

**The John Laing Pension Plan (the “Plan”)
Fair Processing Notice**



Your privacy is important to us. We will process your personal data in accordance with applicable data protection law and this notice. We keep this notice under regular review.

The data controller in respect of the personal data you submit to us either directly or via your employer, is **The John Laing Pension Plan** (the “Plan”) who you can contact via

Nigel Modlinsky
Apex Pension Trustees Limited
140 Aldersgate Street
LONDON
EC1A 4HY

Email: nigel.modlinsky@apexgroup.com

We use your personal data that is provided to us to administer and manage your pension and pay you or any person in respect of you the benefits provided by the Scheme. We are registered with the UK Information Commissioners office with registration number **ZA099862**.

We will comply with data protection law, which says that the personal information we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the person's identity has been removed (anonymous data).

There are certain types of more sensitive personal data (known as ‘special category’ data) which require a higher level of protection, such as information about a person's health, sexual orientation or criminal convictions. We have to process that special category data to perform our obligations under relevant law. Therefore, we do not expect that we will need your specific consent to process that information (because another legal ground will cover our use of that data for these purposes).

Processing your data

We process and use your personal data for the purpose of administering and managing your pension, paying you and/or your spouse and dependants benefits, and providing you with information that is relevant to the Plan and its employers.

We therefore process your personal data on the legal basis that the processing is necessary for the performance of the contract of employment between you and your employer/former employer (as applicable) regarding your participation in the Scheme, to comply with our legal obligations, and/or further to our legitimate interests as trustees of the Plan (i.e. to effectively operate, administer and audit the Scheme; prevent fraud; keep our records up to date and any other legitimate interests that

we may identify, provided always that your interests and fundamental rights do not override those interests).

Please note, in order to comply with our legal obligations in respect of statutory transfers, we may request further personal data from you, such as, employment status and history, salary, pension contribution information, tax status and history, overseas residency and history and driving licence identification number (UK or overseas) so that we can establish an employment link to the Plan and/or overseas residence and mitigate the risk the transfer may be part of a pension scam. When complying with this legal obligation, we may also process personal data of certain third parties incidental to providing evidence of an employment link to a transferee Plan or overseas residence.

If you do not provide us with the personal data that we specify is required for administration of the Plan then we may not be able to administer the benefits provided by it. Additionally, in respect of statutory transfers, if you do not provide us with the requested information, we may be unable to execute the statutory transfer.

Data we collect

As well as collecting it directly from you, we may receive your personal data from other sources, including your employer (or its suppliers), your IFA, from track and trace services, from HMRC or law enforcement agencies, or (if you are a beneficiary or potential beneficiary) from expression of wish forms completed by a member of the Scheme. Personal data that a third party may provide to us for the purpose of administering the Plan may include (but is not limited to):

- identity data, such as first name, last name, maiden name, marital status, data of birth, national insurance number and gender;
- contact data, such as postal address, email address, telephone number; and
- financial data, such as bank account details, past activity relating to the Scheme, information relating to contributions or benefits under the Scheme, your status as a Plan member, and information relating to your tax band.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We will collect, store and use personal information as is necessary to effectively administer the Plan and provide benefits to its members, including the following categories of personal information:

- **Personal details:** name, sex, marital status, date of birth home address, marital status, national insurance number, bank account details (in some cases), and country of residence.
- **Pension data:** member identifying number, joining date, leaving date, earnings, the category and value of contributions and benefits received, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments.

We may also collect, store and use more sensitive types of personal information such as health data where necessary in the case of ill-health early retirement, ill-health reviews and where incapacity or similar reasons determine the benefits paid out. Further information on the processing of sensitive types of personal information can be found below.

Other data controllers

We will also share personal information with the Scheme Actuary who is a joint data controller with the Trustees when using personal information held in respect of you for the purposes of assessing, with the Trustees, certain specified financial matters affecting the Scheme. The current Scheme Actuary is Peter Routledge FFA C.Act of WTW, 51 Lime Street | London, EC3M 7DQ.

Sharing your data

We will transfer your data to the principal employer, other participating employers in its group and their advisers, the Scheme's advisers, service providers and partner organisations to the extent that it is necessary for the management and administration of the benefits provided by the Scheme. We do not use your data for marketing and do not transfer personal data to other organisations for the purpose of marketing their goods or services. We may also disclose your information to third parties, including to the Scheme's:

- Actuary(ies)
- Auditor(s),
- Bank(s),
- Investment Adviser(s)
- AVC Provider(s),
- Legal Adviser(s),
- Risk Benefit Services Provider(s),
- Death in Service Benefits Insurer(s),
- Mortality Screening Services Provider(s),
- Custodian(s)
- System Provider(s),
- Defined Contribution Funds Administrator(s), and
- Covenant Adviser(s).

Your information may be disclosed to third parties:

- to operate, administer and audit the Plan responsibly;
- in the event that a relevant company is involved in any corporate reorganisations and sells its business or assets (in which case we may disclose your personal data to the prospective buyer);
- in the event that we decide to de-risk or insure any of the benefits provided by the Plan (in which case we may disclose your personal data to the prospective insurer(s) and reinsurer(s)); or
- where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustees, the members of the Scheme, or others.

In addition to the processing detailed above, we will also process, disclose or provide your information to the extent required by us according to the Pension Schemes Act 2021, Pensions Dashboards Regulations 2022, and accompanying guidance, as updated from time to time. This may involve the provision of information to qualifying pensions dashboard service and to integrated service providers (ISPs). We note that your information is shared with third parties to the extent that it is necessary to do so for us to comply with legal obligations to which we are subject, in this instance, that being compliance with the various obligations on us in relation to the pensions dashboard service.

Processing your data outside the United Kingdom

Your personal data may be processed outside of the United Kingdom where required in order for us or your employer or former employer to provide benefits to or in respect of you. In each instance, we

have ensured that the processing of your personal data outside the United Kingdom is governed by standard contractual terms approved by the Information Commissioner's Office which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement (or where relevant, another appropriate safeguarding mechanism under data protection legislation). If any such transfers affect you, you can contact us for more information.

Storing your data

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Additionally, we limit access to your personal information to those parties who have a need to know and who will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

We will keep your personal data stored on our systems for as long as it takes us to provide the pension and other benefits provided under the rules of the Scheme. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data.

We may ask you for your specific consent from time to time to process such data. Where we or third parties are processing your personal data on the basis that you have consented to that processing then you are entitled to withdraw your consent. If you do withdraw your consent, we may be unable to administer your pension which may result in you and/or your spouse and dependants not receiving the pension and death benefits provided by the Scheme.

Your rights

Data protection legislation gives you the right to access information held about you. Should you make such a request, we may charge a 'reasonable fee' to meet our costs in providing you with details of the information we hold about you (or to comply with requests for further copies of the same information) where we are entitled to do so under applicable data protection law (e.g. where the request is "manifestly unfounded or excessive"). You also have rights, in some circumstances, to restrict, object to the processing of, rectify and / or require us to erase your personal data.

You are entitled to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller. You can exercise your data protection rights by contacting the Trustee via the Plan administrator

The John Laing Pension Plan
Trafalgar House Pensions Administration Ltd
PO Box 119
Blyth
NE24 9EN
Tel: 0203 386 5702
Email: JohnLaing@thpa.co.uk

If you are unhappy with the way in which your personal data is being processed you have a right to lodge a complaint with the Information Commissioner's Office. You can report your concerns by telephoning their helpline on 0303 123 1113 or through their website at <https://ico.org.uk/concerns>.

Where third parties (such as the Scheme's advisers) are required to process your personal data in order to assist the Trustee or principal employer in administering the Scheme, those third parties may themselves act as data controllers in respect of the way in which they process your personal data and produce their own fair processing notices (also referred to as 'privacy notices'). Various third parties have asked the Trustee to provide you with access to their fair processing notices which explain how they process personal data and meet their compliance obligations under privacy laws. These fair processing notices are available to view on the third-party websites.

Nigel Modlinsky, Chair
Apex Pension Trustees Limited
December 2025