

SG UK Defined Benefit Pension Scheme: Privacy Notice

SG UK DB Trustee Company Limited (“**we**”, “**our**” or “**us**”), the Trustee of the SG UK Defined Benefit Pension Scheme (the “**Scheme**”), is committed to protecting Scheme members’ information and acting in accordance with members’ rights under data protection law.

The SG UK DB Trustee Company Limited (company number 06209963) has its registered office at One Bank Street, Canary Wharf, London, E14 4SG.

This privacy notice contains information on what personal information about you the Scheme collects, what we do with this information, the lawful basis on which personal information is processed and what rights you have.

Collection of your information

Personal data is any information relating to an identified or identifiable individual.

We collect and process the following information about you in the course of acting as trustees of the Scheme:

- your personal details such as your name, gender, date of birth, home address, telephone number, e-mail address, national insurance number, bank account details (in some cases), and country of residence;
- employment details such as your employment history (including any breaks in service or where service has been transferred in), pensionable service records, salary information, contribution records;
- information relating to your benefits such as your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings, the category and value of benefits that you have built up or receive, and relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- details about your family and personal circumstances, such as your marital status;
- information about your spouse/civil partner, dependants, other family members and death benefit nominated beneficiaries; Before providing us with any such information, you should provide a copy of the information in this notice to those individuals; and
- in some cases, special categories of personal data (ie sensitive information which comes with additional safeguards under data protection legislation) such as information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you) and information regarding your sexual orientation.

Where applicable, we also collect information about your dependants or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

How we collect the information

We may collect this information from:

- you (for example when you fill in a pension form, when you contact the Scheme with a query or complaint);
- your employer;

- another pension arrangement (if you have transferred benefits into the Scheme);
- an existing member of the Scheme (if they choose to nominate you for the death benefits that may be due on their death);
- persons acting on your behalf; or
- service providers, such as the Scheme administrator (which is Trafalgar House Pensions Administration (THPA) at present), and service providers who help us trace members with whom we have lost contact.

How we use your information

We use your information for the following purposes:

- (a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other plans;
- (b) for general administration of the Scheme, such as: to record and pay benefits; for reviews we or our administrators conduct for statistical and reference purposes; to determine scheme funding requirements; and for other administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you and to prevent fraud;
- (c) for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime;
- (d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme; and
- (e) when we undertake activities from time to time to help us manage the liabilities of the Scheme, such as longevity hedging, insuring Scheme liabilities with an insurer, scheme mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to with a view to allowing you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) necessary for our legitimate interests in pursuing the purposes set out in (a) to (e) above, and (when we make disclosures to your (current or former) Scheme employer for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of that entity, such interests in each case not being overridden by your privacy interests;
- (ii) in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies referred to below; or
- (iii) in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or, where the processing relates to personal data, manifestly in the public domain;
- (iv) in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits or where the

Scheme rules require you to provide information which we cannot otherwise process without your consent.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to administer your contributions and benefits or record or calculate or pay your or your beneficiaries' benefits.

Disclosures of your information

We typically share your information with the following recipients:

- our suppliers, such as our administrators (Trafalgar House Pensions Administration (THPA) at present), and other providers of services to us and them including Aviva and Utmost in their capacity as Additional Voluntary Contribution providers, and financial advisers (to provide you with financial advice), payroll providers (to record and pay benefits), providers of printing, communication, IT and hosting, marketing, and tracing services (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);
- your (current or former) Scheme employer, such as to assist with the general administration of the Scheme, and for audit purposes in relation to corporate transactions initiated by that entity;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (e) above;
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders, such as HMRC and the Pensions Advisory Service, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Transfers of your information abroad

The use and disclosure of your information for the purpose referred to in (a) and (b) above may involve transferring your information to countries outside of the UK and the European Economic Area. Those countries include India.

In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected in compliance with applicable data protection rules. To ensure an appropriate level of protection, we typically rely on the Scheme employer's binding corporate rules, since the transfers are made within the Scheme employer's company group. Further details of these transfers are available from us on request.

Retention of your information

We will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within our retention management documentation, or that of our administrator where applicable. We determine the period envisaged within such documentation with regard to the Scheme's operational and legal requirements. In general, we will keep your information for 10 years from the date when there is no further liability in the Scheme.

Your rights

You have rights under data protection law of access to and rectification or erasure of your personal data and to restrict its processing, to tell us that you do not wish to receive marketing information, and (in some circumstances) to require certain of your information to be transferred to you or a third party. To the extent that the use of your information is based on your consent, you have the right to withdraw your consent.

You also have the right, under certain circumstances, to object to our processing of your personal data.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the GDPR.

If you have any questions or wish to exercise any of the above rights, you may send an email to pensions-lon-hr@sgcib.com, or write to the address below. Where possible, please let us know the information to which your request relates, including any account or reference numbers, if you have them. You can also use this e-mail address or postal address if you wish to make a complaint about how we process your information.

You can also lodge a complaint about our processing of your personal information with the Information Commissioner's Office (www.ico.org.uk) or, if you reside in the EEA, the relevant data protection authority in your country of residence.

Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits, in which case we will contact you.

Auditor

The Trustee and RSM UK Audit LLP (who are appointed as auditors of the Scheme) each act independently from one another as "data controllers", and are each committed to protecting your information and acting in accordance with your rights under data protection law. The Trustee and RSM UK Audit LLP are not "joint controllers", and process personal data differently and separately. RSM UK Audit LLP processes personal information to fulfil the duty of care that scheme auditors are required to undertake under their appointment.

For information on how RSM UK Audit LLP uses and discloses your personal information, the legal bases for their use of information, and how to exercise your data protection rights in respect of their use of information, please see their privacy notice at <https://www.rsmuk.com/privacy-and-cookies/entities-privacy-policy>.

Status of this privacy notice

This privacy notice was last updated in August 2024.

It may be subject to amendments. Any future changes or additions to the processing of personal data as described above in this privacy notice affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

The Trustee of the SG UK Defined Benefit Pension Scheme

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