

Landis Grinding Systems Pension Fund - Privacy Notice

What is this document?

This is the Privacy Notice for the Landis Grinding Systems Pension Fund (the "Plan"). It sets out why and how the Plan's Trustees and other people involved with the Plan collect, store and use information about you and your rights relating to the information.

We need personal information about you and your dependants to pay benefits and administer the Plan. We are committed to being open and honest about the information we collect and how we use it. We respect the rights of all individuals whose information we obtain in the course of running the Plan.

We comply with all data protection laws relating to information that we hold about you. We take the security of your information seriously and have robust processes in place to ensure it is kept safe and used only for proper purposes.

Who runs the Plan and is responsible for collecting and using your information?

The Plan is run by a Board of Trustees, nominated by the Plan's employer, Fives Landis Limited and Plan members. We, the Trustees, act as the Plan's data controller and decide what personal information needs to be collected to run the Plan and how it will be used.

In this notice when we refer to 'information about you' and 'your personal data', this covers any information that can identify you. For example, your name and address.

Why do we need your information?

We collect information relating to Plan members and people entitled to, or eligible to be considered for, benefits following the death of a member so that we can comply with our legal obligations relating to administering the Plan.

If you are a Plan member, we need information to contact you, calculate and pay your Plan benefits. This includes items such as your address, date of birth and salary details. We may also ask you for details of family members and other people who will or could be entitled to benefits when you die.

If you are someone who is entitled to benefits, or to whom we have a discretion to pay benefits following the death of a member, we will need information about you to contact you, calculate and pay your Plan benefits.

How do we collect your information?

We collect information about you in several ways.

Information you give us

You may give us information yourself in forms we ask you to complete or when you communicate with our representatives or us. This could be by post, email, over the telephone or face-to-face meetings. Other people, such as the organisations which deal with the day to day running of the Plan, or Fives Landis Limited may collect information from you on our behalf.

Information about you received from other people

We may also receive information about you from other people.

If you are employed by Fives Landis Limited, it will provide us with information about you so that we can calculate and pay and get in touch with you about your Plan benefits. This will include things such as your

historical salary details and Plan leaving and joining dates. We may also receive information about you from other pension schemes and your financial, legal or medical advisers. This information may include your contact details, date of birth, sex, employment details, financial information, or, if you are eligible for health related benefits, medical records.

If you are someone who is entitled to benefits, or to whom we have a discretion to pay benefits following the death of a member, we may receive information about you from the member in things such as a death benefit nomination form. We may also receive information about you from other people such as the executors of the member's estate and family members of whom we make enquiries in order to determine who should be considered for the payment of death benefits.

We may also collect information such as address details from organisations such as tracing agencies. We do this to ensure our records about you are up to date and so we have correct address details to get in touch with you about your benefits.

We will check that the people from whom we obtain your personal data either have your consent, or are otherwise legally permitted or required to disclose your personal information to us.

What information do we collect?

We only collect and keep the information we need to run the Plan and calculate and pay benefits.

If you are a member of the Plan, we will hold information including:

- Your name, postal and email address, telephone number, marital status, date of birth, sex and national insurance number
- Employment, salary and pension contribution details
- The name and date of birth of your spouse/civil partner or other dependants, including children
- Details of anyone you want us to consider for the payment of a lump sum benefit payable on your death – this information is optional, but it may affect our ability to pay benefits if you do not provide this information
- Information relating to the tax treatment of your benefits.

If you are entitled to be considered for death benefits under the Plan, we may hold information such as:

- Your name, address, date of birth, sex and national insurance number
- Information showing your relationship with and financial dependency or interdependency on the member.

When your benefits become payable we will also need more information, such as your bank account details.

We may also ask you to provide certain documents so we can confirm the information we have and comply with our legal obligations. These may include birth certificates, marriage or civil partnership registration certificate, passport, driving licence, utility bills and salary slips.

If you contact the Plan's administrators by telephone, your call may be recorded. This is so that there is an accurate record of the information you have provided and the information given to you. This record can be important in dealing with any query or complaint you may have about the accuracy of this information. We will also keep copies of communications, such as letters and emails which we send to you or you send to us which relate to your benefits under the Plan or are otherwise relevant to the running of the Plan. We will

keep these so long as they are relevant to your benefit entitlements and rights under the Plan or the running of the Plan.

From time to time, we may ask for your feedback and for you to check and update the information we hold about you.

Sensitive personal data

If you are entitled to benefits under the Plan, some of your information may include certain special categories of sensitive information. The types of information classed as being sensitive include information relating to things such as your health.

We do not generally collect, store or use sensitive information about you. We generally only do this where you apply for health related benefits. In this case, we will need to process information about your health status such as doctor's letters or reports about your health and you may agree to us contacting your doctor directly. We will always ask for your agreement to us using your health data to assess your entitlement to benefits. You are entitled to withdraw this agreement at any time, although this could mean we are unable to pay benefits to you.

Our records may contain information about your marital status, but we do not process this information specifically to derive and/or record information about your sexual orientation.

How do we use your personal data?

If you are a member, or entitled to be considered for benefits on the death of a member, we use the information about you to comply with our legal obligations to calculate and pay benefits under the Plan.

We will let you know if any information we ask for is optional, and the consequences of not providing optional information. For example, you do not have to provide information on who you would like to be considered for death benefits, but this could mean that those people miss out on benefits. We will ask for your agreement to process any optional information and tell you why we are asking you for it.

In some cases, we will also process information about you where the processing is in our legitimate interests or those of a third party in ensuring that the Plan is administered effectively and that you are kept up to date about the Plan. This could include using your information for assessing member profiles and behaviours to help with investment, funding and retirement planning matters.

We will also use your information to comply with certain legal obligations such as those relating to preventing money laundering and fraud, crime prevention and payment of taxes.

If you have questions or need further information about how we use your personal information or the legal basis on which we collect and use your personal information, you can contact us using the contact details in the *Getting in touch* section at the end of this notice.

Who do we share your information with?

We share your personal information with other people who help run the Plan. These include:

- The Plan's administrators – who deal with the day to day calculation and payment of benefits and communications with you about the Plan.
- Our professional advisers (legal advisers, Plan actuary, investment adviser, financial adviser, covenant adviser), insurance providers, auditors and investment managers. Information about the Plan's professional advisers, insurers and auditors and the Plan's administrators can be found in the Plan's annual report which you can ask us for, free of charge.

- Third party service providers who will process information on our behalf such as, IT, communication, payroll and analytics providers.
- Tracing agencies who assist us with updating Plan data from time to time, such as addresses of members we have lost contact with – they will usually obtain information from public sources, such as electoral rolls and death registers.
- Fives Landis Limited – to help it understand the value of benefits payable to its employees. We will not share any sensitive information about you such as health information, or details of people you have nominated to receive death benefits.

We may also disclose your personal data to law enforcement bodies, regulators, government agencies and other third parties where we believe disclosure is necessary (i) as a matter of law or regulation; (ii) to exercise, establish or defend our legal rights; or (iii) to protect your vital interests or those of any other person. This may include organisations such as HM Revenue & Customs, the Pensions Regulator, the Pension Protection Fund, the Financial Conduct Authority and the Pensions Ombudsman.

We may also transfer information about you to a buyer or potential buyer of all or part of Fives Landis Limited (and its agents and advisers) or other pension scheme trustees in connection with any reorganisation, restructuring, merger or sale, or other transfer of assets. If we do this, we will require that person to enter into a legally binding agreement to use your personal information only for those purposes and destroy it when it is no longer needed. In these circumstances data will be anonymised.

We may also disclose your data to any other person to whom you request us to make disclosure, or if you consent to such disclosure.

How long do we keep your information?

We keep information about you only for as long as we need it to fulfil the purposes for which we collected it, unless the law permits or requires that we retain it for longer.

As a general rule, if you are a Plan member we will hold your information for the duration of your membership of the Plan, or if you are a dependant, until all benefits have been paid to you. We do this so we can ensure your benefits are being calculated properly and deal with any queries about your benefits. We may also hold information until the period in which a legal claim about benefits can be made has come to an end. We may retain some information after you have left the Plan so we can confirm at a future date, that you or your dependants have no entitlement to Plan benefits and to meet our legal obligations, such as retaining information for tax and accounting purposes.

Isio and the Plan Actuary will hold your information for as long as they need it to provide the services they are contracted to provide to us. They may continue to hold information where they need to do so to meet legal or professional obligations.

Is your information safe?

We take the security of your personal information seriously and have measures in place to protect the information under our control from improper use. All information you provide to us is stored on secure servers. People who help run the Plan only access personal information on a need to know basis, as required for their role and receive data protection training. We also take steps to check that service providers who process your information on our behalf have appropriate protections for your information in place.

Is your information transferred outside the UK?

Your personal information is not currently transferred to, or processed in countries other than the UK, or the country in which you are resident.

Data Controllers

The Trustees are the primary data controller in respect of the Plan. The following parties involved in the operation of the Plan are also data controllers in respect of the pension data that they have in their control. Included for each one is a web address where the specific data controller retains their own privacy notices, including details of the data they hold, how that data is used and the legal basis upon which they hold that data:

Role	Name	Address and link to privacy notice if available
Actuarial work	Sangeeta Shah, Isio, and their successors in this role	AMP House, Dingwall Road, Croydon. CR0 2LX https://www.isio.com/privacy-policy/
Lawyer	Michael Calvert, Fieldfisher LLP	Riverbank House, 2 Swan Lane, London. EC4R 3TT
Auditor	Simon Buss, Nortons Assurance Limited	2nd Floor, NOW Building, Thames Valley Park, Reading. RG6 1RB https://www.nortonsassurance.com/gdpr

For members to fully understand how and where their data is used, it is recommended that you should write to them or visit the above sites and review the other data controllers' privacy notices.

Your data protection rights

You have certain rights regarding the information we hold about you. These are:

- You can ask to see a copy of the information we hold about you and ask us to update, correct, and delete it. Your right to delete information will be limited as all the information we hold about you is likely to be needed to calculate your benefits and comply with our legal obligations relating to running the Plan.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information (e.g. to another pensions provider).
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect processing of your personal information where there are other lawful processing grounds.
- You have the right to make a complaint to us if you have any concerns about how we process your personal data.
- To contact us about your data protection rights see *Getting in touch* below.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Information will generally be provided to you free of charge, although we can charge a reasonable fee in certain circumstances.

Updates to this notice

We may update this notice from time to time in response to changing legal, technical or business developments. When we update our notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

How we may contact you

Getting in touch

If you have any questions, concerns or complaints about this notice or our handling of your personal information, you can contact us by using the details below:

The Chair of Trustees of the Landis Grinding Systems Pension Fund
c/o Isio Group Limited
AMP House
Dingwall Road
Croydon
CR0 2LX

Tel: 0800 488 0794

Email: jay.solanki@isio.com

Complaints to data protection authorities

You have the right to complain to a data protection authority about our collection and use of your personal data.

If you are based in the UK you should contact:

The Information Commissioner's Office
Water Lane
Wycliffe House
Wilmslow
Cheshire SK9 5AF

Tel. 0303 123 1113

Website: <https://ico.org.uk>

If you are not based in the UK you can find details of your local data protection authority at http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm