ALLIED DOMECQ PENSION FUND

DATA PROTECTION AND PRIVACY POLICY

Privacy policy

1. Where we obtain your information

In the course of administering your pension, we may hold information about you which is provided by you, your employer or former employer, other pension schemes or medical advisers.

The information we hold includes your name, address, email address, phone number, date of birth, gender, NI number, salary details, bank details, employment history, periods of Fund membership and possibly details of other pension arrangements that you have e.g. in relation to transfers in and out of the Fund. We may also hold information about your spouse, dependants or other potential beneficiaries, and we may hold sensitive personal information e.g. health information, membership of trade unions, race, religion or sexual orientation.

2. How we use your information

Your information will be used to administer your pension benefits and for related activities. In particular, we will use the information to:

- Calculate your benefits, including online calculations that you request;
- Identify what benefits are, or might be, payable to you or, in the event of your death, any beneficiaries;
- Deal with any queries or disputes you may have about your benefits;
- Communicate with you by electronic means, including online, by post or by other means to keep you updated on matters related to the Fund;
- Provide you with information about your benefits and options available to you;
- Calculate and manage the Fund's liabilities, including sharing your personal information with regulated insurers or reinsurers selected by the Trustee to secure, insure or otherwise provide liability management services to the Fund (whether directly or indirectly).

We may add new features, or change some features, of the website. We will notify you of any changes as they go live.

3. Why we use your information

The law requires that the Trustee only uses your personal data for defined lawful purposes.

We will only use your data where:

- it is necessary to comply with our legal obligations as Trustee, e.g. to pay your benefits as they fall due;
- it is necessary to protect your interests, e.g. if we need to let you know about benefit options; or
- it is in the legitimate interests of the Trustee to use your data in that way, and in doing so we are not breaching your rights, e.g. any of the uses referred to above.

We will only process sensitive data, such as information relating to physical or mental health[, sexual life and racial or ethnic origin], with your consent. You have the right to withdraw that consent at any time but please note that failure to provide consent, or withdrawal of the consent, could affect our ability to assess your entitlement to certain benefits, e.g. without access to your medical information, the Trustee could not process a claim for ill- health early retirement or it may mean that we are unable to pay benefits to you or your dependants. If you do withdraw consent, then that will not affect the lawful basis on which the data was processed prior to consent being withdrawn.

When you provide personal information about your beneficiaries, the Trustee and the Fund Actuary assume that you do so with their full knowledge and consent.

The processing of data revealing criminal convictions will only be carried out where there is a legal authorisation to do so under (applicable) UK law.

4. Sharing your information

We may share your information with:

- any of your employers or former employers who participate in the Fund;
- our professional advisers (including legal advisers, medical advisers and auditors);
- the third party administrator appointed by the Trustee to provide day to day administration services;
- the Fund Actuary;
- insurers;
- other organisations providing services to the Trustee, including pensions governance and communications providers and pensions tracing services

but in each case only in relation to matters connected to the administration of the Fund and your benefits under it. We will never use or transfer your data for purposes unconnected with the administration of the Fund.

We may also share your information with government agencies and other authorities (including HMRC and the Pensions Regulator) where necessary for the proper administration of your benefits, the prevention of crime or to meet legal and regulatory requirements.

The Trustee has entered into a bulk purchase annuity policy with Rothesay Life (the "Policy") to insure certain of the Fund's benefits. In order for Rothesay Life to fulfil its obligations under the Policy, Rothesay Life and the Trustee will exchange personal data concerning certain members of the Fund whose benefits are covered by the Policy. Rothesay Life is a data controller in respect of personal data provided to it relating to the Fund members whose benefits are covered by the Policy. Rothesay Life's privacy notice provides full details about how Rothesay Life processes personal data (see paragraph 10 below).

5. Processing your information outside the UK

Where any of your information is transferred outside the UK (e.g. because any of our advisers or service providers have IT systems located in other jurisdictions) we will take steps to ensure that there are appropriate safeguards in place to ensure the security of personal data.

You have a right to request a copy of any data transfer agreement under which the Trustee transfers your personal data, or to otherwise have access to the safeguards which it uses. Please see the "Contact us" section below if you would like further information about these safeguards.

6. Security of your information

The Trustee is committed to ensuring that your personal information is secure. We have in place appropriate technical and contractual measures to ensure that information is only shared for the reasons, and by the means, set out in this notice, and which are designed to protect your personal data from loss, misuse, alteration, destruction or damage.

The Trustee takes great care to ensure that your information is kept secure when we need to share this with a third party as outlined above.

7. How long do we keep your information?

Pension Funds are long-term. We will of course keep your personal information for as long as you are a member of the Fund. We will also retain some information for a period after you leave the Fund, e.g. following a transfer out, to enable us to deal with any queries that may arise after you have left. We will keep information after you have left the Fund for as long as we believe necessary in order efficiently to administer the Fund. In certain cases, legal or regulatory obligations require us to retain specific records for a set period of time.

8. Monitoring and recording

We may monitor, record, store and use any telephone, email or other communication with you in order to maintain a record of any instructions given to us, for training purposes, for crime prevention and to improve the quality of service to Fund members.

9. Access to your information

By law you are entitled to know what personal information we hold about you, the purpose for which we hold it and the identity of any person to whom it has been disclosed. You can also ask us to correct any errors in your data, and can ask for unnecessary or outdated data to be deleted. Please see the "Contact us" section if you would like more information.

You are also entitled to receive a copy of the information and you can exercise these rights by contacting the Fund administrator.

10. Contact us

Allied Domecq First Pension Trust Limited is the Trustee of the Fund and is the "data controller", i.e. we determine the purposes for which your personal data are processed, and how they are processed. The Fund's actuarial advisers, Willis Towers Watson, and legal advisers, DLA Piper UK LLP, are also data controllers in relation to personal data relating to Fund members. They will only process personal data provided or made available to them by the Trustee for the purposes of providing advice to us.

If you would like any further information about the Trustee's approach to data protection and privacy, or to request details about the information we hold, please contact Barnett Waddingham, the Fund's administrator by calling them on 0344 264 3586 (or if you are calling from outside the UK +44 117 313 7233) between 9am and 5.15pm, Monday to Friday.

Willis Towers Watson's privacy notice is available at https://www.wtwco.com/en-gb/notices/how-willis-towers-watson-uses-personal-data-for-actuarial-services-to-uk-pension-scheme-trustees. DLA Piper's privacy notice is available at https://www.dlapiper.com/en/uk/privacy-policy/ . Further information on Rothesay Life's compliance with data protection laws, and a link to their privacy notice, is available at https://www.rothesay.com/media/aaadtreu/privacy-information-oct-2020.pdf Hard copies are available from the Fund administrator.

11. The Information Commissioner

The Information Commissioner is the UK's independent authority set up to uphold information rights and data privacy for individuals. You have the right to lodge a complaint with the Information Commissioner if you are dissatisfied with any aspect of the way that we collect and use your personal information.

The Information Commissioner's website can be found here or you can call their helpline on 0303 123 1113.

12. Updates and changes

We will keep this privacy policy under review and may update it from time to time without prior notice. Any revised policy will appear on this page. Please check every now and then for any updates.