

Fair Processing Notice

Dewhirst Pension Fund ("Fund")

Data Controllers

The Trustees hold and process personal data about you and (if applicable) your spouse and dependants. This means that the Trustees are a 'data controller' under data protection legislation, and have to inform you of certain information, which is set out in this notice.

The Fund's advisers and actuaries, Aon Solutions UK Limited ("**Aon**") and the scheme actuary, currently Lynette Brown of Aon, are also data controllers in relation to personal information when providing certain actuarial services. Aon provide pensions advisory and calculation services that relate to your membership of the Fund.

What information do we hold?

The data the Trustees hold is the information necessary to administer your benefits in the Fund and this includes your and (if applicable) your spouse and dependants' name, gender, date of birth, NI number, address, marital status, salary information and (where your pension is in payment) bank details. In certain circumstances the Trustees may also seek your consent to process more sensitive personal data about you, for example medical information if you wish to take your benefits under the Fund early due to ill health.

Aon will also hold and use your personal information in order to be able to provide their services.

How do we collect it?

The Trustees collect this information in a variety of ways. Some data is obtained either directly from you, your spouse or dependants, for example via forms or other correspondence. The Trustees may also collect some data from your employer, HMRC or (if the Trustees do not have up-to-date contact details for you and are trying to locate you to arrange payment of your benefits) from a tracing agent.

How we use your data

Your data is held by the Fund's administrators, currently First Actuarial LLP, which is responsible for administering the Fund on behalf of the Trustees. Additionally, in order to operate the Fund and administer your benefits, the Trustees may need to disclose your data to other people, such as:

- the scheme actuary and the Trustees' other professional advisers;
- third parties you have authorised us to share information with (such as your nominated representatives or financial advisers);
- third parties who assist in administering the Fund (such as tracing agents, banks, IT providers and payroll providers);
- companies in the Dewhirst group (including your employer) and their advisers;
- public authorities, regulators and other government bodies, such as HMRC and the Pensions Ombudsman; and

- insurance companies, to arrange particular entitlements, for instance life insurance or an annuity policy where relevant.

What are our grounds for processing your personal information and what is it used for?

For the most part, it is necessary for the Trustees to hold and process your personal information to comply with their legal obligations as trustees of the Fund. For example we may use personal information:

- a. to calculate benefits, provide estimates and pay benefits;
- b. to respond to any queries raised by beneficiaries of the Fund;
- c. to trace your most recent address in order to communicate with you about your benefits;
- d. to calculate the funding requirements for the Fund;
- e. for internal record keeping;
- f. to comply with any present or future law, rule, regulation, guidance or directive; and
- g. to comply with demands or requests made by regulators, governments and law enforcement authorities.

There may also be cases where the Trustees may have a legitimate interest in processing your personal information, for example in sending you information relating to pension scams and options relating to your benefits in the Fund. Where we rely on this legal basis to use your personal information, we will take appropriate steps to ensure the processing does not infringe your rights and freedoms under data protection legislation.

In addition, as noted above, in certain circumstances the Trustees may seek your consent to process more sensitive personal data about you, for example medical information if you wish to take your benefits under the Fund early due to ill health. You have a right to withdraw your consent, but this will not affect any processing which has already occurred (and the Trustees may still need to process your data to some extent, where strictly necessary, to comply with their legal obligations).

The Trustees do not make any automated decisions or carry out profiling using the personal information provided.

Aon need to use your personal information to provide their services to the Trustees, including management of the Fund and your membership within it, helping to ensure that the funds within the Fund are sufficient to cover the members who are party to it, liability management (i.e. providing advice on the different ways benefits could be determined, and drawn, from the Fund), scheme actuary duties (which include assessing individuals who are members of the Fund and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the Fund appropriately), regulatory compliance, process and service improvement and benchmarking.

Aon may pass your personal information to third parties such as financial advisors and benefits providers, insurers, their affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

How long will we retain your personal information?

The Trustees will retain your data whilst benefits are due and payable to you or your dependants from the Fund. Due to the long term nature of the Fund the Trustees will normally continue to store your data for at least 12 years from the date that benefits payable to you or your dependants have been paid in full, you transfer out of the Fund or the Fund winds up and ceases to exist having secured all benefits for members outside of the Fund.

However, to enable the Trustees to comply with their legal obligations and in order to be able to answer queries about how your benefits were dealt with (which could be made many years later), it may be necessary for some information to be retained for longer than this. Any processing of your data once you have transferred out of the Fund or all your benefits have been paid or secured in full will only take place where strictly necessary.

Where is your personal information held?

The Fund's administrators utilise the support and resources of their offshore affiliates and there may be other circumstances where your personal information needs to be transferred overseas, for example to an appointed processor or sub-processor, or if you live or work outside of the UK or European Economic Area, in order to respond to any queries that you may have. Where this applies, all steps reasonably necessary will be taken to ensure that your data is treated securely and in accordance with this notice. If you wish to know more about the safeguards in place, please contact the Fund's administrators using the contact details below.

Updating your data and your other rights

It is important to inform the Trustees of any changes in your personal details to ensure the information held is accurate and kept up to date. If you need to do this, or wish to know more about the information held by the Trustees or the purposes for which it is held, please contact First Actuarial LLP using the following contact details:

First Actuarial LLP
Mayesbrook House
Lawnswood Business Park
Leeds
LS16 6QY

In addition, you are entitled to:

- request access to or removal of any personal data being held by or on behalf of the Trustees;
- object to the processing of your data (and ask the Trustees to stop doing so) where the Trustees are relying on their legitimate interests as the legal basis for processing (unless these override yours); and
- withdraw your consent to the use of your data, to the extent such use is based on your consent.

The provision of your personal data is not a requirement of any contract or legislation, nor are you obliged to provide your personal data. However, if you did not, or you exercise some of the rights above, the Trustees may be unable to administer your benefits, so you would have to cease to be a member of the Fund, or the Trustees may have to adjust or withhold payment of your benefits.

Complaints

If you have a complaint about the Trustees' management of your data, you have the right to lodge a complaint with the Information Commissioner's Office, which can be contacted on 0303 123 1113 or via other methods of communication as explained on their website (currently <https://ico.org.uk>).

More information

More detail about Aon's use of your personal information is set out in their full Privacy Notice. We recommend that you review this notice which is available online at <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>, or you can request a copy by contacting Aon, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH.

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