

Concentric plc and Subsidiary Companies Directors Pension and Life Assurance Scheme

Dalriada.
A better way

Privacy Notice: UK GDPR and Data Protection Act 2018 compliant

Please read this privacy notice carefully as it contains important information about who we are, what personal data (information) we hold about you, how and why we collect, store and use it, how we may share this information and your rights in relation to your personal information.

Who we are

We, as trustees of the Concentric plc and Subsidiary Companies Directors Pension and Life Assurance Scheme (the Scheme), collect and use certain personal information about you. When we do so, we are subject to the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018, referred to as the "Data Protection Laws" in this notice. We are responsible as 'controllers' of that personal information for the purposes of those laws and are registered with the Information Commissioner's Office as a data controller. As controllers, we must provide you with the information contained in this privacy notice.

Personal data we collect about you

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

We hold the following personal data about you in the course of acting as trustees of the Scheme:

- personal details such as your name, date of birth, gender, contact details (i.e., address, home and mobile phone numbers, email address) and national insurance number, pension or member reference number and employee number (where applicable);
- 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;
- details about your family and personal circumstances, such as your marital status, details of your spouse/civil partner, dependants, other family members and death benefit nominated beneficiaries; and
- financial details such as your bank account and tax information.

We may also hold 'special categories' of personal data (i.e., sensitive information which comes with additional safeguards under data protection legislation). This may include information about your health, including any medical conditions (for example, if you apply for ill-health early retirement). We will only use this personal data for limited and specific purposes. For example, to process an ill health early retirement application.

When you provide information about your family and other potential beneficiaries who may be eligible to receive benefits on your death, we will assume that you have the consent of those individuals to provide us with their information and that you will share this privacy notice with them.

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;

Concentric plc and Subsidiary Companies Directors Pension and Life Assurance Scheme

Dalriada.
A better way

Privacy Notice: UK GDPR and Data Protection Act 2018 compliant

- 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;
- service providers who help us trace members with whom we have lost contact;
- medical advisers; and
- HMRC, the DWP and certain regulatory bodies.

In some circumstances we will share responsibility as controllers for your personal data.

How we use your personal information

We will typically use this information for the following purposes:

- to contact you;
- to respond to individual queries, complaints and disputes;
- to calculate, provide and assess eligibility for Scheme benefits;
- to comply with obligations arising from administering the Scheme;
- to determine and implement alternative ways of providing Scheme benefits (e.g., by way of a lump sum and/or pension, transfer to another scheme, the purchase of an insurance policy, a merger with another pension scheme);
- to determine and manage Scheme investments and risks;
- to determine and manage Scheme liabilities and funding requirements; and
- in connection with any corporate activity the Scheme employer may be engaged in.

Reasons we can collect and use your personal information

The lawful basis on which we collect and use your personal data will usually be one or more of the following:

- to comply with a legal obligation (e.g., our obligations to you as trustees to administer the Scheme so that you can receive the benefits you are entitled to and make transfers to other schemes);
- for the performance of a contract with you, or to take steps to enter into a contract; and
- for the purposes of our legitimate interests in running the Scheme properly or those of a third party (e.g., your employer), but only if these are not overridden by your interests, rights or freedoms.

Concentric plc and Subsidiary Companies Directors Pension and Life Assurance Scheme

Dalriada.
A better way

Privacy Notice: UK GDPR and Data Protection Act 2018 compliant

Where we hold 'special categories' of personal data, we will explain to you at the time why we need it and how the information will be used. We will only process special categories of personal data for the establishment, exercise or defence of legal claims to benefits or in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation).

If there are any occasions where we seek your explicit consent to process sensitive data, then you can withdraw it at any time.

Who we share your personal information with

We share your personal data, including your name, date of birth and address details, with our Scheme administrators, actuaries, advisers, bankers, investment advisers, insurers and other service providers. This data sharing enables us to continue to administer the Scheme in a compliant manner and to ensure our duties as trustees are discharged lawfully.

We will share personal information with law enforcement or other authorities if required by applicable law.

We may share personal information with the Scheme employer and its advisers; e.g. in connection with member option exercises an employer may want to run in connection with the Scheme or to companies and firms which are considering or have acquired the Scheme employer or the whole or part of the employer's business, or to the trustees, administrators or professional advisers of any pension scheme to or from which your rights under the Scheme may be, are being or have been transferred, or to any company participating in such a pension scheme.

Some of these entities may also be data controllers under the Data Protection Laws.

We will not share your personal information with any other third party.

Third-party service providers are required to protect your personal information in line with our policies and we only permit them to process your personal data for specified purposes.

However, under the data protection laws, the Scheme Actuary, like the trustees, is a controller of personal information and this notice is issued on behalf of the trustees, and the Scheme Actuary.

The Scheme Actuary is appointed under pensions legislation and will process your personal data to undertake various tasks, primarily around Scheme funding. The individual Scheme Actuary may change from time to time; we will inform you of any changes in the Summary Funding Statements that are issued on a regular basis.

Contact details for the Scheme Actuary are provided below.

Scheme Actuary: Warren Firth, Broadstone Consultants & Actuaries Limited, 100 Wood Street, London, EC2V 7AN [the privacy notice for Broadstone can be found at <https://www.broadstone.co.uk/privacy-policy/>].

Transfer of your information out of the UK

In certain circumstances, your personal data may be processed outside of the UK.

Concentric plc and Subsidiary Companies Directors Pension and Life Assurance Scheme

Dalriada.
A better way

Privacy Notice: UK GDPR and Data Protection Act 2018 compliant

If we (or our service providers) process personal data outside of the UK, we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this privacy notice and in accordance with safeguards required by applicable laws.

How long we keep personal data

We will keep your personal data for no longer than is necessary to fulfil our legal obligations in relation to the Scheme. Given the long-term nature of a pension scheme, this inevitably means that your personal data will be kept for a long period of time, including after you have ceased to be entitled to Scheme benefits (to deal with any queries or complaints which may arise in relation to the administration of the Scheme or in the event of a legal claim to show that we have administered the Scheme correctly). Personal data will typically be held until the Scheme has wound-up.

YOUR RIGHTS

Under the UK GDPR you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your personal information;
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object in certain other situations to our continued processing of your personal information; and
- otherwise restrict our processing of your personal information in certain circumstances.

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 UK GDPR which can be found online at <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you would like to exercise any of those rights, please:

- email, call or write to us using the contact details provided below, and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

KEEPING YOUR PERSONAL INFORMATION SECURE

Concentric plc and Subsidiary Companies Directors Pension and Life Assurance Scheme

Dalriada.
A better way

Privacy Notice: UK GDPR and Data Protection Act 2018 compliant

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way.

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

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The UK GDPR also gives you the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published in December 2022.

We may change this privacy notice from time to time. When we do, we will inform you. Please contact us using the details provided below if your personal data changes at all.

How to contact us

Please contact us by email, phone or post using the details below if you have any questions about this privacy notice or the information we hold about you, including any requests to exercise your legal rights.

James Geen
Dalriada Trustees Limited
Linen Loft
27 – 37 Adelaide Street
Belfast
BT2 8FE

Email: admin@dalriadatrustees.co.uk
Telephone: 02890 412 005

December 2022