

Moorbrook Textiles Limited Retirement Benefits Scheme (the "Scheme")

GENERAL DATA PROTECTION REGULATIONS ("GDPR")

The regulations regarding how we handle your data are changing.

Before 25 May 2018, organisations were required to comply with the Data Protection Act 1998. This Act governed the collection, storage and use of personal data held electronically or in paper records. From 25 May 2018, this Act is replaced by the UK Data Protection Act 2018 and General Data Protection Regulation ("GDPR").

Dalriada Trustees Limited, as Trustee of the Moorbrook Textiles Limited Retirement Benefits Scheme, has a policy for meeting our obligations under GDPR and we are pleased to enclose a Privacy Notice that sets out this policy for your information. In particular, we would like to draw your attention to the following key points:

- Individuals have increased rights under the GDPR in relation to their personal data which include in certain circumstances the right of access to data and rectification and erasure. We hope you understand that we need to hold your data to be able to pay your benefits and to answer any questions about your entitlement.
- Under the GDPR, members have the right to obtain access to their personal data by way of a Subject Access Request (SAR). Members will no longer be charged for making this request and a response should be received within one month of the request.
- This notification does not affect your benefits entitlement in any way. In particular, please note that if you are currently in receipt of a pension, the above information will not affect your benefits.

If you have any queries regarding the above information, please contact us:

Louise Campbell
Dalriada Trustees Limited
Linen Loft
27-37 Adelaide Street
Belfast
BT2 8FE

Tel: 0141 331 9985
e-mail: Louise_Campbell@dalriadatrustees.co.uk

May 2022

Moorbrook Textiles Limited Retirement Benefits Scheme (the "Scheme") - Data Privacy Notice

BACKGROUND

This statement sets out how the Trustee of the Scheme (the "Trustee") handles personal information in compliance with the General Data Protection Regulation ("GDPR").

We recognise that the correct and lawful processing of personal data is important and integral to our successful operations and to maintaining the trust of the people we deal with. We fully endorse and adhere to the principles set out under GDPR.

For the purposes of this statement, the term "personal data" shall refer to personal data and sensitive personal data.

The Trustee may act as Data Controller and a Data Processor in relation to the handling of the personal data and sensitive personal data of the persons/organisations we deal with.

PURPOSE AND LEGAL BASIS FOR PROCESSING THE PERSONAL DATA

The personal data that the Trustee will hold includes but is not limited to your name, address, date of birth, National Insurance details and marital status, as well as details of your children or other beneficiaries. We will also hold details of your salary history, membership dates and any contributions to your pension scheme. In addition, we will retain medical history information that you supplied to us, as this may affect your pension entitlement.

The reason we need to hold and process this data is so that we can properly administer your benefits and pay your pension and other benefits when they come into payment.

The Trustee may from time to time share this data with the administrators, actuary, regulatory body or other professional advisers to the scheme, in order to manage your benefits. The Trustee may also share the personal data with insurers to ensure that we provide your benefits in the most cost effective way.

The Trustee may share your data with the Employer in connection to their obligation to fund certain benefits under the Plan. The Employer may use your data for the purposes of preparing annual disclosures for the Company's audited accounts, reviewing the funding position of the Plan or providing information to the members about access to the pension freedoms (either via a one-off exercise or as a business as usual offering) or other liability management exercises.

As Data Controller, the Trustee has a legal obligation to administer and pay your benefits from your scheme. We will therefore hold and process your data on this legal basis. Both the Trustee and our advisers and administrators also have our own legitimate interests for processing your

data. You may object to the processing of your personal data on this basis, but your objection may be rejected by the Trustee if there are compelling reasons to do so.

When the Trustee is required to process your sensitive personal data, such as your medical records, the Trustee shall seek your explicit consent to do so. You may withdraw your consent to processing on this basis at any time.

As pension benefits are a long term undertaking and queries can arise many years into the future, it is not possible to give a specific period for which the data will be stored. The Trustee will hold and process your data in line with regulatory requirements for as long as:

- we are legally required to do so
- we are responsible for payment of benefits from the Scheme
- we require to protect our legitimate interests

HOW DOES THE SCHEME ACTUARY USE YOUR PERSONAL DATA?

As well as the Trustee, the Scheme Actuary (John Gordon of XPS Pensions Group) is also a Data Controller and uses your personal data to advise the Trustee on the financial management of the Scheme. This advice helps to ensure that the Trustee is able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

INDIVIDUAL RIGHTS

The Trustee will fully respect your rights under GDPR including:

- You have the right to make a subject access request for free and which can be made electronically
- You have the right to make a subject access request to verify the lawfulness of the processing we are carrying out
- We will respond to your subject access request within one month of you making it
- You can request to correct your personal data if it is inaccurate, incomplete or out of date or request the deletion of your personal data
- You may obtain a copy of your personal information from us, except in limited circumstances
- You have the right to complain to the supervisory authority whose contact details are set out below.

COMPLAINTS

Complaints relating to breaches of GDPR and/or complaints that an individual's personal data is not being processed in line with the Data Protection Principles will be managed and processed by the Trustee.

All complaints of dissatisfaction will also be processed in accordance with the Trustee Complaints Process and should be sent to:

Trustee of the Moorbrook Textiles Limited Retirement benefits Scheme
c/o Dalriada Trustees Limited
Linen Loft
27-37 Adelaide Street
Belfast
BT2 8FE

Without prejudice to any administrative or judicial remedy, you have the right to lodge a complaint with the supervisory authority, the Information Commissioner's Office (ICO), if you consider that the processing of your personal data infringes the principles of GDPR. Their address is as follows:

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