

The RR Donnelley UK Pension Scheme ("Scheme")

Privacy Notice

This notice has been prepared by Dalriada Trustees Limited as Trustee of the Scheme ("Trustee"), in connection with UK data protection legislation. It explains how the Trustee collects, holds and uses personal data in relation to the Scheme.

The Trustee has to keep certain personal data about you in order to administer your benefits under the Scheme. The Trustee takes the security of your data very seriously and takes steps to ensure that:

- No more data is held about you than is necessary;
- The data is kept accurate; and
- The information about you is not disclosed to third parties other than as required to administer the Scheme and data will be anonymised where practical.

For the purpose of data protection legislation, the Trustee is a data controller in relation to this data; our actuarial advisers, Mercer Limited ("Mercer"), and the Scheme Actuary, Mrs Joanne Arnold, are also data controllers. Mercer and our Scheme Actuary are classed as data controllers when providing certain actuarial and consultancy services, Mercer has an appointed Data Protection Officer tasked with ensuring its compliance with data protection legislation. You can contact Mercer's Data Protection Officer (DPO) at any time if you have any questions about Mercer or its scheme actuaries' privacy practices. The DPO's details are:

Data Protection Officer
Marsh & McLennan Companies, Inc.
Tower Place West
London
EC3R 5BU

If you have any questions for the Trustee, please contact Angela Stokes on behalf of the Trustee using the contact details shown at the end of this notice.

The controllers hold and use your data (referred to as "processing" under data protection legislation).

Why do we hold your personal data?

The data about you is held for the purposes of administering the Scheme, including to calculate and pay benefits. The ways that the Trustee will use your information include:

- Identifying you and your survivors and making sure your details are up to date
- Communicating with you
- Calculating and paying your benefits
- Making Trustee decisions – such as whether to agree to early payment or how to distribute benefits after your death, as applicable
- Deciding how to invest contributions paid by you or your employer

We hold this information because processing your personal data is necessary for compliance with our legal obligation to administer the Scheme.

There may be circumstances when we do not need your personal data to comply with our legal obligations, but we consider that we have a legitimate interest to hold it in order to ensure that you or your dependants receive the benefits you are entitled to receive, and to ensure that the Scheme is well run.

We may also process sensitive personal data relating to you, for example, data concerning your health (in respect of ill-health early retirement options). We will normally hold this sensitive data with your consent but we may also rely on exceptions permitted by the legislation, for example, if you are physically unable to give your consent. You may withdraw that consent at any time, in which case we

may erase that sensitive data if possible and if we have no other lawful reason to keep it. However, if we consider that doing this will prevent us from paying the correct benefits to you or your dependants, we will let you know before proceeding.

How do we collect your personal data?

The Trustee may collect and process information you provide to it in connection with the Scheme. This could include your date of birth, gender, marital status, length of employment, bank details, National Insurance Number and details of your dependants. It will also include your contact details such as residential address, email address and telephone number.

You need to provide this information to the Trustee in order for us to correctly calculate and pay your Scheme benefits. You may have to provide some of this personal data to us as a condition of membership of the Scheme, or by law, for example if you are required to tell us about benefits you have taken from another pension arrangement. Data such as your pensionable salary and service details may also have been obtained from or confirmed with your former employer.

If you do not provide us with this information, we will not be able to properly and accurately administer your benefits under the Scheme and you may not receive the benefits you are entitled to.

We may also collect information from other parties such as previous or future employers, anyone who might be entitled to benefits as a result of their connection with you, family members or personal representatives, people who have named you as a potential beneficiary in relation to their own pension benefits, tracing agents who may be appointed to confirm the accuracy of address details held by the Trustee (and may provide updated address details, or notification of death, where appropriate), or government bodies or departments such as HMRC.

Who do we disclose your personal data to?

In the course of administering the Scheme, the Trustee will engage professional advisors and third parties to assist us.

In particular, data may be passed to:

- HM Revenue & Customs when you are paid benefits from the Scheme and for the purpose of administering your benefits if you have been contracted out of the State second pension through your membership of the Scheme;
- Insurance companies if the Trustee intends to secure your benefits through an annuity policy and for the purposes of administering any benefits you have from paying additional voluntary contributions to the Scheme;
- The Scheme's employers;
- Pensions administration service providers;
- Tracing agencies;
- Advisers such as actuarial firms, lawyers, accountants, auditors and investment consultants;
- Fund managers and AVC Providers.

Some processing may also involve transferring personal data to countries either within or outside the European Economic Area ("EEA"). These countries may not offer the same level of protection for personal data as are provided within the UK so where necessary we will put in place appropriate safeguards, and require the organisations we deal with to do the same. If you would like further information about these safeguards please contact Angela Stokes on behalf of the Trustee at the address below.

How long will you store my personal data for?

Your personal data will be kept for as long as it is necessary to administer your benefits. Data may be kept after you have ceased to be a member of the Scheme and there are no further benefits payable in respect of you if the Trustee considers that retention of the data is necessary for the proper administration of the Scheme, for example to show how the liability for your benefits was discharged.

What rights do I have?

You have the right to:

- Obtain a copy of the personal data held about you;
- Have the data rectified, if it is inaccurate;
- Restrict the processing of your data;
- Withdraw any consents you have given to us in respect of your sensitive personal data, where we are relying on your consent.

If we hold your data because we have a legitimate interest in doing so (and not to comply with a legal obligation), you may also have the right to:

- Have the data erased if it is no longer necessary for the Trustee to hold it for the purposes of administering the Scheme;
- Object to our processing of your data.

You can exercise any of your rights, or get further information, by contacting Angela Stokes using the email address below.

If you believe your data is being processed unlawfully you can complain to the Information Commissioner's Office using the following details:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 or 01625 545 745
Email: casework@ico.org.uk

More information with regard to your rights can be found on the Information Commissioner's Office's website: <https://ico.org.uk/> and by contacting Angela Stokes.

Contact

You do not need to take any action in response to this notice. However if you have any questions please contact Angela Stokes on behalf of the Trustee at Angela_Stokes@dalriadatrustees.co.uk.

June 2022