

Data Privacy Statement relating to the General Data Protection Regulation

What is this Statement for and what action do I need to take?

This statement is needed because of data protection requirements arising from the General Data Protection Regulation EU/2016/679 as it forms part of the laws of England and Wales ("**UK GDPR**").

Under the UK GDPR, the Trustee is required to provide you with information on how it will collect and use personal data about you, the circumstances in which it may share or otherwise use the personal data and to whom it may disclose this personal data.

This statement is for your information and you are not required to take any action.

Information the Trustee may collect from you or already holds about you

For the purposes of data protection legislation, including the UK GDPR, the Trustee is the "data controller" with regards to the personal data it collects about you and your dependants.

The Trustee may collect and process personal data about you in connection with the Metal Box Pension Scheme and, where applicable, other pension and life assurance arrangements the Trustee is responsible for, such as the Metal Box Additional Voluntary Contribution Plan (together the "**Schemes**").

Personal data may include the following:

- Membership and employment data including dates of joining and leaving employment, periods of pensionable service, earnings, contributions and details of benefits.
- Personal data including name, date of birth, sex, contact details (e.g. home address, telephone numbers and e-mail address) and your National Insurance number.
- Other financial data such as, bank sort code and account number, tax code, Lifetime Allowance and other protections.
- Identification documents including birth, marriage, civil partnership and death certificates, and pension sharing or earmarking orders.
- Family data, including current marriage or civil partnership, any previous relationships and dependants, death benefit nomination forms and potential beneficiary information.
- Technical information and other information about your visits to the Metal Box Pension Scheme website.

In addition, the Trustee may collect, hold and use categories of personal data about you that are of a sensitive nature ("**Sensitive Personal Data**"), such as medical information in relation to an ill-health early retirement benefit.

The Trustee is committed to protecting and respecting your privacy and rights.

Information the Trustee may collect about you from the Company or third parties

The Trustee may collect personal data about you from the Company (and its affiliates) or other third parties.

This may include information relating to your employment, your salary and your benefits which is relevant to your pension and related benefit entitlements. From time to time, the Trustee may collect personal data relating to you from other third parties such as regulatory authorities.

Purposes for which and the basis upon which the Trustee will process your personal data

The Trustee will process your personal data, and the personal data of your dependants, in order to administer your pension and related benefit entitlements under the Schemes.

The Trustee must have a legal basis on which your personal data is processed in accordance with data protection legislation. In most cases, the legal basis for processing your personal data will be the "legitimate interests" ground (although there may be other grounds too for processing personal data). This means it is in the "legitimate interest" of the Trustee, or another third party, to process your personal data. The Trustee will only grant its approval to allow another third party to process personal data it controls, after it has taken into account the interests and rights of the Schemes' members (or others).

Where the Trustee is required to process Sensitive Personal Data, it will approach the relevant member for specific consent to the processing of such data.

Retention of personal data

The Trustee will hold personal data of members of the Schemes and their dependants for as long as may be necessary in order to fulfil the purpose of processing data described above.

Inevitably, this means that personal data may be retained by the Trustee for extremely long periods of time, including after entitlement to receive benefits by an individual and/or their beneficiaries has ceased. The end date for holding personal data in respect of a particular beneficiary is expected to be the date the relevant Scheme is wound up but it may be held longer to defend or pursue legal claims or deal with queries in relation to benefits that may arise.

Disclosure of personal data

In order to administer the Schemes, the Trustee uses third parties such as scheme administrators, providers of money purchase investments, annuity providers, printing suppliers, mortality tracing agencies, pensioner associations and professional advisers, including the scheme actuary, lawyers, accountants and medical advisers. The Trustee may disclose your personal data to these third parties in connection with services they provide to the Trustee. The Trustee will comply with its obligations under the UK GDPR in relation to any such disclosures.

The main holder of your personal data is the Schemes' administrator Equiniti, whose privacy policy can be found at <https://equiniti.com/uk/privacy-policy/>.

The Trustee passes personal data to the Company (and its affiliates) and its advisers to manage the Schemes, which includes the provision of pension and life assurance benefits.

The Trustee may also disclose your personal information to other third parties in the following types of situations:

1. to an independent financial adviser as part of a special project such as a Pension Increase Exchange or Enhanced Transfer Value exercise;
2. to the trustees and administrators of other pension schemes operated by the Company (or its affiliates). The privacy policy of Aon, the new master trust provider the Company has selected can be found at <https://aonmt.tbs.aon.com/legal/privacy-statement>; or
3. if the Trustee is under a duty to disclose or share your personal data in order to comply with any legal obligation, such as HMRC or the Pensions Ombudsman.

Some of the advisers to the Schemes may hold the personal data provided to them as a separate data controller (rather than data processor). For example, Willis Towers Watson, who provide actuarial services, and the Scheme actuary, act as a separate data controller. (A copy of the privacy notice issued by Willis Towers Watson is available at: <https://www.willistowerswatson.com/en-GB/Notices/how-willis-towers-watson-uses-personal-data-for-actuarial-services-to-uk-pension-scheme-trustees>).

The Schemes' auditors and lawyers also hold personal data as separate controllers (and you can view their privacy statements at www.pwc.co.uk/who-we-are/privacy-statement.html and <https://www.mayerbrown.com/Legal-Notices/Privacy-Notice/>, respectively).

The Law Debenture Pension Trust Corporation plc is also a Trustee of the Metal Box Pension Scheme and may also hold personal data as a data controller. You can view their privacy notice at <https://www.lawdebenture.com/governance-service/pension-trusteeship/pensions-data-protection/data-privacy-notice-schemes-to-which-we-are-no-longer-appointed>

International transfers of personal data

The Trustee has strict security procedures regarding the storage and disclosure of personal data. It is possible that the personal data that they collect about you may be transferred to, and stored at, or processed in one or more countries outside the United Kingdom (“UK”). It may also be processed by staff operating outside the UK who work for our third parties. Where such countries have not yet been deemed by the Secretary of State to offer adequate data protection, the Trustee will require the third party to provide an adequate level of data protection as required under the UK GDPR. If the Trustee cannot ensure such an adequate level of data protection, your personal data will not be transferred outside the UK.

Your rights under the UK General Data Protection Regulation

You have certain rights under the UK GDPR which may be relevant to the Trustee's operation of the Schemes:

- a) to request details or copies of the personal data the Trustee holds about you as data controller (by making an access request to the Trustee);
- b) to have your personal data corrected if it is inaccurate or incomplete (which is important to ensure your benefits are paid correctly);
- c) to have your personal data deleted or removed if there is no reason for its continued storage and processing (this might be relevant if there is no reason for a supplier the Trustee uses to continue to hold your data);

- d) to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances (this might be relevant where the Trustee gives you the option to refuse to agree to your data being passed to a third party);
- e) to request the transfer of your personal data to another party (such as your independent financial adviser); and
- f) where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent (this is unlikely to be relevant for the Schemes).

Changes to this Statement

The Trustee reserves the right to change this Statement and any other relevant policies or procedures at any time without notice to you.

Any changes the Trustee makes to this Statement will, unless otherwise indicated, apply to any personal data already obtained by the Trustee before the changes were made.

Please contact the Secretary of the Metal Box Pension Scheme using the contact details below if you have any questions as to recent changes.

Contact

If you have any questions concerning this Statement or the policies or procedures referred to above, you can contact the Trustee using the following details: Mrs C R Aston, Senior Pension Management Consultant. Email: MetalBox@Barnett-Waddingham.co.uk

Where you are dissatisfied with any aspect of our handling of your personal data you have a right to lodge a complaint with the Information Commissioner's Office. Their contact details are:

Address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 or 01625 545 745
Fax: 01625 524 510
Email: icocasework@ico.org.uk

Issued by: Metal Box Pension Trustees Limited

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