

GABRIEL (CONTRACTORS) LIMITED PENSION FUND
(the “Scheme”)

PRIVACY POLICY

This notice informs you of how we collect, hold and use your personal data, and, where applicable, data relating to your dependents and beneficiaries. Personal data means any information from which an individual can be identified, and includes data held either electronically, or in paper format.

Data controllers

PSGS is the sole corporate Trustee and “data controller” of the Scheme. We are responsible for ensuring that the Scheme handles your personal data in accordance with the EU General Data Protection Regulation (as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 2 of the European Union (Withdrawal) Act 2018) and the Data Protection Act 2018 (together referred to as “the GDPR”).

The actuary to the Scheme is David Joy of First Actuarial LLP. In accordance with guidance issued by the Information Commissioner’s Office (ICO) the Trustee and the Scheme actuary are considered “joint data controllers” in respect of the Scheme data which they share. Other professional advisers appointed to the Scheme may also share your personal data with the Trustee as joint data controllers. This notice covers the Trustee and the joint data controllers. If you wish to exercise any of your rights in respect of your personal data (see below) you should contact the Trustee who will action your request on behalf of the relevant data controllers.

A list of professional advisers who share your data with the Trustee as joint data controllers is available on request.

Obligations under the GDPR

The GDPR requires your personal data to be:

- processed lawfully, fairly and in a transparent manner;
- collected and processed for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, kept up to date;
- kept for no longer than is necessary; and
- kept with appropriate security.

How do we collect the data?

Most of the personal data we hold has been provided to the Trustee, or to a former Trustee of the Scheme, either directly by members, or by their employers. In certain cases information may have been provided by the members or the employers directly to the administrators of the Scheme, acting on behalf of the Trustee.

We will only use your personal data for the purpose for which it is collected, or for a reason that is compatible with the original purpose.

There is no automated decision making in operation in respect of the Scheme.

What information do we collect and why do we collect it?

It is necessary to collect and hold a wide range of personal data about you (and your beneficiaries) in order to administer the Scheme, and calculate and pay your benefits. The data is collected and processed so we can fulfil our legal obligations under legislation and the governing documentation of the Scheme. We also process your data because it is in your and the Trustee's legitimate interests. Processing your data enables us to keep accurate records about your membership of the Scheme which allows us to meet our legal obligations. It also ensures that you receive the correct benefits from the Scheme.

The personal data we hold relates to your membership of the Scheme and includes:

- Your name and contact information, including your email and home address and your telephone number;
- Your date of birth, and the dates you joined and left the Scheme;
- Financial information, such as your national insurance number or details of the salary you received, and the contributions you paid, whilst you were an active member of the Scheme;
- Your marital status and dependents;
- Your bank details (where benefits are being paid)

We may also need to receive information to validate your identity, such as copies of your marriage certificate, passport, bank statements or utilities statements.

Special category data

In certain circumstances, where it is necessary to establish your entitlement to a specific benefit, such as an ill health early retirement pension, we may need to collect and use information on your state of health. If you die, we may also need to obtain information about your beneficiaries or other family members or individuals, in order to determine how to apply your benefits under the Scheme. This data may be "special category" or "sensitive" personal data.

We will only collect and process special category data with your explicit consent, or for reasons of substantial public interest (as set out in the GDPR) or to establish or defend a legal claim. Where you have provided your consent to the collection and processing of your data, you have the right to withdraw your consent for that specific processing at any time.

For how long do we keep your data?

We will only retain your personal data for as long as is necessary for the purposes stated in this notice. We have in place strict review and retention policies.

If it is no longer necessary to hold your personal data, we will ensure that it is destroyed securely and will take all reasonable steps to ensure that any third party we use to process the data also does so.

How do we keep your data secure?

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access, use or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. We cannot guarantee the effectiveness of your own security systems when you transmit non-sensitive details, such as your email address, over the internet. However, once we receive your information, we do our best to ensure its security on our

systems. Our security technologies and procedures are regularly reviewed to ensure they are up to date and effective.

Who has access to your personal data?

We take your privacy seriously. We will not sell or rent your information to third parties, or share your information to third parties for marketing purposes.

It will sometimes be necessary to pass on information to third parties. For example:

- We have legal obligations to pass on to government agencies certain information, such as tax or national insurance information;
- We may be audited or checked by third parties, such as the Pensions Regulator, and we may be required by legislation, or otherwise, to provide to them information that relates to your benefits in the Scheme.

These parties are required to maintain confidentiality in relation to your information.

In addition, we may need from time to time to pass your information to First Actuarial LLP, the administrator of the Scheme, or to third party service providers who will hold and process your personal data in the course of providing services to the Scheme that are essential to its ongoing administration. Third party service providers may include the actuary, auditor, investment manager, financial adviser and legal adviser to the Scheme. Your personal data may also be passed to, and processed by, annuity providers, or the sponsoring employers of the Scheme

Where personal data is processed by a third party on behalf of the Trustee, contractual provisions have been put in place with the third party, to ensure your data remains secure.

European Economic Area

The data that we collect from you will usually be stored inside the UK or the European Economic Area (EEA).

However, if you live or work outside the UK or the EEA, we may need to transfer your personal data outside of the UK or the EEA to respond to any queries that you may have. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this notice.

Your rights under the GDPR

Under the GDPR you have the right in certain circumstances to:

- Request access to your personal data
- Request correction of the personal data that we hold about you.
- Request deletion of your personal data.
- Request that we restrict the processing of your personal data.
- Request the transfer of your personal data to another party.

Please note that if you exercise your rights to delete your personal data, or restrict our processing of it, we may be unable to calculate and pay your benefits under the Scheme.

Further information and contact details

Please contact the Scheme administrators at leeds.admin@firstactuarial.co.uk if you have any queries regarding this notice or wish to receive further details of our privacy practices or a copy of our Data Protection Policy. Alternatively, you can write to them at First Actuarial LLP, Mayesbrook House, Lawnswood Business Park, Leeds, LS16 6QY, or call them on 0113 818 7300.

If you want to review, verify, correct or request deletion of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please also contact the Scheme administrators, who will provide you with a request form to complete. You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in these circumstances.

If you believe we are processing your personal data in a way that is inconsistent with the law, or you are not satisfied with the response to any query you raise with us, you may contact the Information Commissioner's Office (ICO), whose helpline is 0303 123 1113.

If you wish to contact PSGS direct, please email Kevin Kenneally at kevin.kenneallypsgovernance.com or alternatively you may write to Kevin Kenneally at Forbury Works, 37-43 Blagrove Street, Reading RG1 1PZ.

FOR AND ON BEHALF OF

THE TRUSTEE OF THE GABRIEL (CONTRACTORS) LIMITED PENSION FUND