PRIVACY NOTICE FOR THE HWG 2006 LTD PENSION PLAN

Ross Trustees Services Limited t/a Independent Governance Group (an independent professional trustee company) is the professional corporate sole trustee (the **'Trustee'**) of the HWG 2006 Ltd Pension Plan (the **'Plan'**).

Ross Trustees Services Limited T/A Independent Governance Group is a private company limited by guarantee, registered in England & Wales with company number: 07904277.

The UK's data protection laws govern how personal information is used by organisations. The Trustee determines the purposes and means of processing personal information held for the purposes of the Plan, and how it is used, and as such is a data controller as defined in the data protection laws. In this Privacy Notice the terms "we", "us" and "our" refer to the Trustee. References to "you" or "your" means any individual whose personal information we hold. Where we use the words "personal information" we use these words to describe information that is about you and which identifies you.

We take your privacy seriously, and we are committed to protecting it. This Privacy Notice explains how we will use any personal information that we collect from you or that is provided to us by you or a third party in connection with your membership of the Plan. It describes in detail who is responsible for the personal information that we collect about you, what personal information we collect, how we will use such personal information, who we disclose it to and your rights and choices in relation to your personal information.

From time to time we may make changes to this Privacy Notice to reflect any changes to the way in which we process your personal information or changing legal requirements.

Information we collect about you

You, and Assa Abloy on behalf of Arran Isle (as a fully owned subsidiary of the Assa Abloy Group of companies) (the **'Company'**) in its capacity as principal employer of the Plan, have provided us, and may in future provide us, with information relating to your employment with the Company and your membership of the Plan.

The personal information we collect and use about you includes:

- Contact information – your name, address, email and telephone number;
- General information – your gender, marital and family status, date and place of birth;
- Identification information – your social security or national insurance number, passport number, tax identification number, driver's licence number, entitlement to reside in the UK or other government issued identification number;
- Employment information -the pensionable pay you received while in employment, any bonuses you received, your contribution history and your length of service;
- Benefit preferences information – information concerning your nominated beneficiary of any death benefit payment you are entitled to;
- Technical and usage information, which may include for example details of your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website and information about how you interact with and use our website;
- Financial information - your bank account details, HMRC tax code and other data necessary for processing payments and fraud prevention as well as details relating to investment and pension assets held outside the Plan;
- Dashboard information – your date of birth, your Plan membership start and end dates, your employer's name, your accrued pension value and your estimated retirement income; and

- Any other information legally required in order to administer your pension and provide your benefits.

We may also collect certain sensitive personal information about you with explicit consent in order to provide your benefits. This may include:

- You may provide us with information about your physical and mental health (including any medical conditions), in connection with establishing what benefits may be payable under the Plan on your death or following a divorce or dissolution of your civil partnership.

- There is the ability to retire under the Plan, in certain circumstances, on ill health grounds. You may provide us with information about your current or previous physical, mental or medical conditions, your health status, any injury or disability information, medical diagnoses, medical procedures performed and treatment given, personal habits (for example, smoking or consumption of alcohol), prescription information, and the medical history of your family. We may also obtain this information from medical practitioners.

In the course of your membership of, or other involvement with, the Plan, you may provide us with personal information relating to potential beneficiaries (e.g. individuals who could receive benefits on your death or following your divorce or dissolution of your civil partnership) and other third parties. The personal information we collect in respect of potential beneficiaries may include:

- their name, address and date of birth;
- their marital and family status;
- their national insurance number;
- information about their gender and sexual orientation;
- information about their medical history and current medical condition; and
- their bank details.

You may also provide us with contact details for other third parties such as other pension providers or financial advisers.

We will use this personal information in accordance with this Privacy Notice. If you are providing personal information to us relating to a potential beneficiary or other third party, you confirm that you have informed the potential beneficiary or other third party that you have shared their personal information with us and that you have made the information in this Privacy Notice available to the potential beneficiary or other third party.

How we collect your personal information

We use different methods to collect personal information from and about you including:

- Your interactions with us. You may give us your personal information by filling in online forms or by corresponding with us by post, phone, email or otherwise.

- Automated technologies or interactions. As you interact with our website, we will automatically collect information about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

- From third parties or publicly available sources. We will receive personal information about you from various third parties and public sources. This information may include the following:
    - information from the Company in its capacity as your employer or former employer (as appropriate);
    - information from the administrator of the Plan;
    - information from another pension provider (if you have transferred in any other pension benefits);
    - Information from insurance providers in relation to AVCs and/or insured annuities.
    - information about criminal records or civil litigation history (for example, for preventing, detecting and investigating fraud); and
    - following the death of a member, information about that member or their potential beneficiaries for the purposes of receiving death benefits (which may come from other potential beneficiaries or from relatives, solicitors or executors for example).

How we use your information

We use your information to ensure the effective, efficient and accurate management of the Plan in accordance with the Plan Rules and the law. This includes using your information to enable us to calculate and pay the correct pension benefits during your lifetime and on your death. We may use your information to enable us to communicate with you. The purposes for which we may process your personal information include:

- to communicate with you;
- to assess and process transfer requests;
- to notify you about changes to the Plan and any retirement options or transfer offers;
- to manage and administer the Plan;
- to prepare Plan valuations and ensure sufficient funding;
- in connection with any potential or actual arrangement by which the Plan secures an income stream from an insurance company to supplement the financial support provided by the Company to the Plan or by which your particular benefits are secured with a recognised insurance company;
- to enable us to decide who should receive benefits on your death;
- to identify you to ensure that you receive the correct amount of benefit;
- to pay your benefit entitlement;
- to enable the government to provide find and view services in relation to certain pensions schemes; and
- to administer our website (including troubleshooting, data analysis, testing, system maintenance and support).

We will only use your personal information for the reason we collected it, or for a closely related reason. For example, we might use it to improve our services, carry out audits, or prevent fraud. If we ever need to use your information for something very different, we will let you know and ask for your permission if the law says we need to. In some cases, we may use your information without telling you – such as when the law requires us to do so for safety, legal, or public interest reasons.

We may be required to obtain your personal information to comply with our legal requirements or to enable us to fulfil our duties as Trustee of the Plan. If you do not provide the relevant personal information to us, we may not be able to meet these requirements and our ability to process your benefits under the Plan may be impacted.

What legal reason do we have for using your personal information?

In order to use your personal information, we must have a lawful basis for doing so. Mostly, the reason that we have for using your information is to enable us to carry out the role of Trustee of the Plan (known as 'legitimate interest'). Without using your information, we could not operate the Plan effectively. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Further detail can be found in the Schedule, but the legitimate interests for the Plan will typically be one or more of the following:

- complying with applicable legal and regulatory obligations and any codes of practice;
- conducting a valuation of the Plan to ensure that there are sufficient funds to meet the liabilities of the Plan;
- maintaining accurate records and ensuring that the Plan is administered in accordance with its governing documents;
- undertaking risk management exercises;
- fulfilling our disclosure requirements, including issuing summary funding statements;
- notifying you of any changes to your pension benefits;
- contacting you and providing information about any retirement options or transfer offers the Trustee and or the employer make available;
- processing transfer requests or quotations requested as part of a divorce;
- obtaining relevant background information when exercising any discretion under the Plan's governing documents;
- complying with our obligations to notify HMRC and the Pensions Regulator of certain events;
- managing the impact of any change to the legal status of the Company; and
- to keep our website up to date and relevant.

In some situations, however, we are required by law to use your information (an example would be under the Pensions Dashboard Regulations 2022) or we may need to use your personal information to perform a contract which we are about to enter into or have entered into with you. In limited circumstances we can only use your information where we have your consent to do so (for example sensitive personal information will usually only be processed with consent). If your consent is needed, and has not already been obtained, we will not use your information until we have sought and obtained your agreement.

Who we share your information with

We will not sell your personal information and we will not transfer it outside of the UK or EEA without appropriate safeguards in place. We will only share your personal information with selected recipients and only where it is necessary to do so for the purposes mentioned above in relation to how we use your information. As at the date of this Privacy Notice, we may share your information with the following persons:

- The Plan actuary is considered a joint data controller with the Trustee for the purposes of providing certain actuarial and consultancy services. For example, the actuary uses your personal information to advise the Trustee on the financial management of the Plan. This advice helps to ensure the Trustee is able to meet its obligations to pay members' benefits and is necessary to comply with obligations placed on it by legislation, including the Pensions Act 2004. For more information on how the actuary uses your data, you can contact them using the details at the end of this Privacy Notice.
- The Plan administrator, to enable it to provide administration, pension payroll, consultancy and investment services to the Plan.
- The Plan auditor, to enable it to complete the audit of the Plan's Annual Report and Accounts.
- The Plan's professional advisers including accountants, lawyers, investment consultants, other professional advisers and suppliers/service providers (for example, IT service providers) that assist us in carrying out our activities as Trustee of the Plan.

We may also seek to share your data with insurance companies for the purposes of securing benefits where appropriate, and your data would be shared on an anonymised basis wherever possible. Whenever we share your information with a third party, that party is required to enter into a binding agreement that they will use your information only for the purposes for which it is provided, and that they will not pass it on to any other person.

In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, local or foreign regulators or to judicial or administrative authorities) or where disclosure is both legally permissible and necessary to protect or defend our rights or protect your rights or those of the public.

Any personal information held by us and any third-party will be treated as confidential. We will not sell your personal information to third parties.

Keeping your information secure

The security of your personal information is important to us. We will take all steps reasonably necessary to ensure that your personal information is kept safe and secure in accordance with data protection laws. We will take appropriate measures to protect your personal information against loss, theft, and unauthorised use.

At present, personal information is not transferred outside the UK or EEA but if in the future any of the advisers or the Trustee do transfer personal information, appropriate safeguards will be put in place.

If you choose to send us information via the internet there is a risk because it is not completely secure. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

How long we will keep your information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any pension scheme requirements and where required for the Plan to assert or defend against legal claims or until the claims in question have been settled. However, pension benefits build up and are paid over a long period. We will therefore need to retain your details until at least 6 years after the final benefits are paid. If a spouse's or dependant's pension is payable on your death, this may mean that we keep your personal information for some time even after you have died.

We will not keep information longer than it is needed. Once your information is no longer needed, we will take reasonable steps to securely destroy it. In the event that the Plan winds up or we cease to be Trustee of the Plan, we may enter into an agreement to transfer the personal information we hold to another party.

Your rights regarding your information

Under data protection laws you have increased rights in relation to your personal information although these rights only apply in certain circumstances and are subject to certain exemptions.

You have the right to access information that we hold about you, and to obtain certain information about how we use your information and who we share it with. In some situations, we may be exempted from providing this information, for example if doing so would reveal personal information about another person.

You have the right to have any errors in the information held about you corrected. If you wish to request a correction, please explain in detail why you believe the personal information we hold is inaccurate or incomplete.

You also have certain additional rights, for example to have your personal information permanently deleted, to request that we stop processing your personal information, and to request that we transfer your personal information to another party. If the reason why we are able to process your personal information is because you have given consent for us to do so, you may withdraw that consent at any time.

	Summary of your rights
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
Right to erasure of your personal information:	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary for the purposes for which it was collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate so that our use of your information is suspended for such period as is necessary to enable us to verify

	Summary of your rights
	the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data portability	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances. For example, where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party). You also have an absolute right to object to the use of your personal information for direct marketing purposes.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
Right to complain to the relevant data protection authority	You have the right to complain to the Information Commissioner's Office, where you think that we have not used your personal information in accordance with data protection law.

If you would like to exercise any of these rights, please contact us using the contact details at the end of this Privacy Notice. Please note that we will need to verify your identity before we can respond to your request.

Complaints

You also have a right to make a complaint if you think that there has been an infringement of the data protection laws in connection with your personal data. You also have a right to complain if you ever make a data subject access request and you are not satisfied with our response to that request.

Please contact us for details of the complaints process and the complaint form which can be used for the purpose of making a complaint (but please note that you may complain in the medium which best suits you).

This does not affect your legal right to complain to the Information Commissioner's Office, which is the UK data protection supervisory authority. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline (0303 123 1113).

Contact us

If you have any questions, comments or requests regarding this Privacy Notice, the use of your personal information, or to make a complaint, please get in touch with the Plan administrators:

Address: First Actuarial, Mayesbrook House, Lawnswood Business Park, Redvers Close, Leeds, LS166QY
Email: leeds.admin@firstactuarial.co.uk

Telephone: 0113 818 7300

Or the Plan Secretary, Independent Governance Group at HWG2006@weareigg.com.

The Plan actuary is Mark Riches of First Actuarial: Mark.riches@firstactuarial.co.uk.

Schedule

Purpose/Use	**Type of Personal Information**	**Legal Basis**
To communicate with you	Contact Information	Necessary for our legitimate interests (ensuring that the Plan is administered in accordance with its governing documents).
To assess and process transfer requests	Contact Information	Necessary for our legitimate interests (ensuring that the Plan is administered in accordance with its governing documents).
To notify you about changes to the Plan and any retirement options or transfer offers	Contact Information	Necessary for our legitimate interests (ensuring that the Plan is administered in accordance with its governing documents).
To manage and administer the Plan	General Information Employment Information	Necessary for our legitimate interests (ensuring that the Plan is administered in accordance with its governing documents).
To prepare Plan valuations and ensure sufficient funding	General Information Employment Information	Necessary for our legitimate interests (ensuring that the Plan is administered in accordance with its governing documents).
In connection with any potential or actual arrangement by which the Plan secures an income stream	General Information Employment Information	Necessary for our legitimate interests (ensuring that the Plan is

from an insurance company to supplement the financial support provided by the Company to the Plan or by which your particular benefits are secured with a recognised insurance company		administered in accordance with its governing documents).
Providing information to HM Revenue & Customs (HMRC) for tax purposes	General Information Financial Information Identification Information	Necessary for our legitimate interests (ensuring that the Plan is administered in accordance with its governing documents).
To enable us to decide who should receive benefits on your death	General Information Employment Information Benefit Preferences Information Potential Beneficiary Information	Necessary for our legitimate interests (ensuring that the Plan is administered in accordance with its governing documents). Necessary for the legitimate interests of your potential beneficiaries (ensuring that they receive their benefit entitlement in accordance with your wishes).
Reporting to The Pensions Regulator as required by pensions legislation	General Information Employment Information Financial Information Identification Information	Necessary for our legitimate interests (ensuring that the Plan is administered in accordance with its governing documents).
To identify you to ensure that you receive the correct amount of benefit	Identification Information	Necessary for our legitimate interests (ensuring that the Plan is administered in accordance with its governing documents).
To pay your benefit entitlement	Financial Information	Necessary for our legitimate interests (ensuring that the Plan is administered in accordance with its governing documents).
To enable the government to provide find and view services in relation to certain pensions schemes.	Dashboard Information	Necessary to comply with a legal obligation (The Pensions Dashboards Regulations 2022).
For legitimate interest purposes in preventing and detecting pension fraud	Contact Information General Information Financial Information Identification Information	Necessary for our legitimate interests (ensuring that the Plan is administered in accordance with its governing documents).