

Aggreko Pension Scheme - Privacy Notice

As trustee of the Aggreko Pension Scheme (the "Scheme"), we are committed to protecting and respecting your data.

Please read this Privacy Notice as it contains important information about how we use personal data that we collect from you or that you provide to us. This Privacy Notice explains how we comply with data protection legislation, including the Data Protection Act 2018 and the General Data Protection Regulation (the 'Data Protection Laws').

You do not need to take any action in relation to this Privacy Notice.

Who are we?

When we say 'we' or 'us' in this Privacy Notice, we are referring to Aggreko Pension Scheme Trustee Limited, which is the trustee of the Aggreko Pension Scheme. Aggreko Pension Scheme Trustee Limited is managed by a board of directors (the 'Trustee Directors'). We are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

You should share this information with your family and dependants where you have provided us with personal information about them.

The Scheme Actuary to the Scheme is Scott Binnie of Barnett Waddingham LLP. In accordance with guidance issued by the Information Commissioner's Office (ICO) and the Institute and Faculty of Actuaries (IFoA) the Scheme's trustee and Scheme Actuary are considered "joint data controllers" for the purposes of the Data Protection Laws.

Who do we collect personal data about?

Personal data is information that can be used to uniquely identify or contact a single person. We will collect and process personal information about:

- deferred members,
- pensioners (including those in receipt of dependants' or spouses' pensions),
- former members/pensioners with no further entitlement under the Scheme,
- ex-spouse participants,
- non-members who will or may receive benefits from the Scheme (for example, on the death or divorce of a member),
- non-members who have received benefits from the Scheme and have no further entitlement, and
- non-members who have submitted enquiries.

What information do we use?

The categories of personal data processed by us may include, but is not limited to:

- Biographical information such as name; membership/reference number; address (including former addresses); contact details (including telephone numbers and e-mail addresses); date of birth; gender (including details of any gender recognition certificate); marital status (including divorce details if, for

example, benefits form part of a divorce settlement); family members; beneficiary nominees; Passport or identification card details; birth/adoption certificate details; and death certificate details.

- Employment information such as employment history, information regarding periods of pensionable service (including periods of absence), and previous salary data.
- Financial and tax information such as your bank account details; salary information; tax and National Insurance information.
- Pension information such as defined benefits contributions paid to the Scheme, contributions relating to defined benefits, by or on behalf of a member; defined benefits, whether actual or potential, paid or payable to or in respect of a member; additional voluntary contribution account information; contracting-out records; and death benefit distribution information (including expression of wish forms and information required to assess eligibility for, or allocation of, benefits to potential beneficiaries).

Special Categories of Personal Data

We may also collect and store more sensitive categories of information about you, such as your marital status and sexual orientation, for example details of your spouse, civil partner or dependants; and your health, including any medical conditions, for example if you are applying for a pension on the grounds of ill-health.

These special categories of personal data will only be processed where necessary for the purposes of administering the Scheme, such as establishing eligibility for benefits, the calculation and payment of those benefits and demonstrating our past compliance with our duties.

How do we collect your information?

We may collect personal data:

- directly from you when you correspond with us by phone, e-mail or otherwise or when you provide us with any additional information, for example, when you attend worksite presentations, roadshows or other events,
- from third parties such as our service providers (for example, our Scheme administrator), the employer Aggreko or your former employer (for example, another pension scheme if you have transferred benefits), where a member includes your details in a beneficiary nominee form, from a third party in relation to an event affecting you (for example, in the event of serious ill health), or from third party agencies or publicly accessible sources to try and find you when we have lost contact with you. We also work closely with third parties (including, for example, analytics providers and credit reference agencies), or
- from regulatory authorities (such as The Pensions Regulator (TPR)) or government departments (such as HMRC or the Department for Work and Pensions).

How we might use your information?

We use information held about you in order to administer the Scheme. In particular, we will use personal data in order to:

- issue communications and information (whether through us or through third parties),
- respond to member and third party queries and disputes,
- calculate and pay benefits (including pensions, lump sums and transfer values) from the Scheme,

- establish eligibility for benefits (including following divorce or death of a member, or in cases of ill health or early retirement),
- pay tax charges and monitor whether allowances are exceeded and report to HMRC (including compliance with anti-money laundering duties, if applicable),
- ensure compliance with contracting-out requirements,
- prepare Scheme accounts, audits and/or TPR Scheme returns,
- carry out actuarial valuations and calculations,
- decide or advise upon the investment of pension scheme assets and to implement investment decisions,
- obtain or prepare quotes for annuities or other insurance products,
- purchase annuities or other insurance products,
- demonstrate our past compliance with our duties,
- establish your identity,
- pay fees and expenses owed,
- help the Scheme's sponsoring employer understand its liabilities to the Scheme, and
- carry out the general administration functions of the Scheme (for example, to ensure documentation is properly executed and drafted, conflicts of interest are identified and managed and/or appropriate records are maintained).

What is our legal basis for using your information?

The legal basis on which we rely to process your data is our legitimate interest as trustee of the Scheme to properly look after the Scheme in accordance with our legal, regulatory and tax obligations. This includes but is not limited to ensuring that correct levels of contributions are paid and that benefits are correctly calculated; paying benefits as they fall due; communicating with you; and ensuring expected standards of Scheme governance are met (including standards set out in TPR guidance). We might also process your data on the basis of the sponsoring employer's legitimate interest in understanding and managing its liabilities to the Scheme. You may object to the processing of your personal data on the basis of these legitimate interests, but we may continue to process your personal data if there are compelling reasons to do so.

If we need to use information about your health or other sensitive information (see Special Categories of Personal Data, above), we may ask for your consent. However, sometimes there may be reasons of public interest or law that enable us to use this information without consent, for example, for the purposes of making a determination in connection with your eligibility for benefits under the Scheme. If we have asked for and you have given us your consent, you can withdraw your consent at any time by using the details below in the 'Contact Us' section. However, if we do not hold the data necessary to administer your benefits, we may not be able to pay out the benefits you or your dependants are entitled to.

We may also transfer your personal data if you have given us your consent or if there is a legitimate interest in doing so, for example, to a new scheme, to the Scheme's sponsoring employer or to an insurer.

How long will we hold your information for?

Pension benefits are paid over a long period and your benefits under the Scheme, and any spouse's or dependants' benefits, are based on information which may go back many years.

In practical terms, there are often occasions when a review of historical member information is necessary and queries can arise many years into the future. Therefore we will hold personal data for as long as is necessary in order to satisfy our legal obligations, meet any regulatory requirements, pay or secure benefits under the Scheme, protect our legitimate interests, and ensure that any future queries or complaints can be dealt with accordingly. It is not possible to provide a specific period for which the data will be stored.

We review our retention periods for personal data on a regular basis.

Who we might share your information with

In order to administer the Scheme, we may from time-to-time share your personal data with various entities including: (a) our Trustee Directors, (b) the Scheme's sponsoring employer, (c) any Scheme administrator or actuary appointed by us, (d) any employees of the sponsoring employers, who are appointed to carry out work on behalf of or in relation to the Scheme, (e) our professional advisers, (f) our auditors, (g) our AVC providers, (h) our insurers, (i) HMRC, (j) the Pensions Ombudsman, and any other service providers we use to support the Scheme who provide services including but not limited to information processing, managing and enhancing member data, providing member services, print and mailing services, investment management, cloud hosting and data analytics.

If your benefits are transferred to another scheme, we will also need to give the administrators of that scheme information about you.

Our service providers may correspond with you directly in order to provide these services. We may also disclose your personal information to third parties to:

- comply with any court order or other legal obligation or when data is requested by government or law enforcement authorities, or
- protect the rights, property, or safety of us or others. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;

International transfers of personal data

From time to time, we may transfer your personal information outside of the EU to service providers, subcontractors and regulatory authorities for the purposes described in this Privacy Notice. If we do this, we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this statement and in accordance with safeguards required by applicable laws..

Your rights

You may have a number of rights depending on the legal basis for processing your data. If you would like further detail about your rights, please contact us using the details set out below in the 'Contact Us' section.

Your rights may include:

- transparency over how we use you data and to make a subject access request (right of access),
- a right to have your personal data updated and corrected (right of correction/rectification),
- a right to ask us to delete your information (right to be forgotten),
- a right to ask us to stop processing your information (right to restriction),
- a right to object to (i) processing based on our legitimate interests; (ii) processing of your information for direct marketing purposes; and (iii) automated decision making and profiling (right to object),

- a right to receive a copy of your information, or have this sent to a third party (right to data portability), and
- a right to claim compensation for material or non-material damage caused if we breach the data protection rules (right to compensation).
- a right to lodge a complaint about the data controller with the ICO.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then we may not be able to perform our duties in relation to the Scheme, and your benefits could be affected.

If you would like to find out more about your rights, you can visit the Information Commissioner's Office website (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>).

A copy of our data protection policy and formal Data Mapping are available on request in writing by using the contact details below.

Security precautions in place to protect against the loss, misuse or alteration of your information

We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorised access, use, alteration and disclosure. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Our security measures are regularly reviewed.

Contact Us

If you have any questions regarding this Privacy Notice or about our privacy practices, or wish to exercise any of your rights, please contact us via the Secretary to the Trustee at:

Deborah McNally
Secretary to Aggreko Pension Scheme
Barnett Waddingham
163 West George Street
Glasgow
G2 2JJ
Email: aggreko@barnett-waddingham.co.uk

What if you have a complaint?

To make a complaint about how we have handled your information, contact us as set out above.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with the Data Protection Laws, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address: Wycliffe House,
Water Lane,
Wilmslow
Cheshire
SK9 5AF

Telephone Number: 0303 123 1113 or 01625 545 745

Website: <https://ico.org.uk/>

Keeping up-to-date

We may change this Privacy Notice from time to time. You can request an up-to-date copy of the Privacy Notice at any time using the contact details above.

This Privacy Notice was last updated in April 2022.

The Aggreko Pension Scheme