

Ricoh UK Products Pension Plan

Privacy Notice – July 2023

This Privacy Notice has been issued by the Trustees and Scheme Actuary of the Ricoh UK Products Pension Plan (the Plan) to comply with the General Data Protection Regulation (GDPR), which came into effect on 25 May 2018. This document replaces any Fair Processing Notice issued under the Data Protection Act 1998. You do not need to take any action in respect of this notice.

Data controllers and Data Protection Officers

The Trustees of the Plan are Jason Dale, Paul Spragg, Tim James and Russell Downes. The Scheme Actuary to the Plan is Ruth Thomas 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 Trustees and Scheme Actuary of the Plan are considered "data controllers" (the holders, users and processors of personal data) for the purposes of the GDPR. In some circumstances, the legal advisers, CMS Cameron McKenna Nabarro Olswang LLP, and the employer, Ricoh UK Products Limited, are also considered data controllers.

The data controllers may be contacted as follows:

Barnett Waddingham LLP
3 Devon Way
Birmingham
B31 2TS

Email: Ricoh.admin@Barnett-Waddingham.co.uk
Telephone: 0333 1111 222

Use, transfer and storage of personal data

In the course of running the Plan, the data controllers may require information from you in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner's) health. Such information will be used by the Plan's administrators to determine the benefits payable to you and your beneficiaries.

In addition, the data controllers may hold any or all of the following items of personal information about you:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Plan).
- Salary and data relating to investments and pension assets held outside of the Plan (for example to the extent they are relevant in relation to taxation of your pension income).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

Your personal data is provided to the data controllers by your employer and other third parties such as HMRC, the DWP, regulatory bodies and by tracing organisations. Your personal data may also be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Plan. We store your personal data until such time as we will no longer need it. Pension benefits are paid over a long period and your right to benefits under the Plan is based on information which may go back many years. Our policy is, therefore, to retain information relating to you until your membership of the Plan ends.

Once your membership ends, we may decide to delete some of the data held in relation to you after 7 years. However, information will be held for longer where we consider it appropriate in order to ensure the Plan pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

The Trustees share your data with the Plan's administrator, Barnett Waddingham LLP, Scheme Actuary, the sponsoring employer and AVC providers. They may also share data with other third parties including the Trustees' other professional advisers (including the Plan Auditor and lawyer), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator), insurers and where applicable, their counterparties (such as reinsurers) and brokers who are typically involved in arranging such insurance for the purpose of purchasing annuities or other insurance products. Your data may be shared by the Plan's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. A comprehensive list of parties with whom data may be shared is set out in the Trustees' formal Data Mapping document, available on request in writing to the data controllers at the address above.

The Plan administrators, on behalf of the Trustees, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustees' legal obligation to run the Plan in accordance with the Trust Deed and Rules. The Trustees and / or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in your and the Trustees' legitimate interests to use your personal information to:

- Keep up to date and accurate records about your membership of the Plan : *so that the correct benefits can be paid*
- Undertake risk-management exercises : *so that the risk your benefits are not paid is reduced*
- Comply with the law, including regulations and guidance issued by the Pensions Regulator : *so that you, the Trustees and their advisers are not subject to legal sanctions which may impact benefits*
- Efficiently manage the impact of any change to the legal status of the sponsoring company : *so that your benefits are not adversely affected for example by a sale or company merger*

The Scheme Actuary uses your personal data to advise the Trustees on the financial management of the Plan. This advice helps to ensure the Trustees are able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Trustees have conducted due diligence on their suppliers to ensure they process data within the UK and/or the EEA or in line with appropriate data protection policies. If any third party suppliers process data outside of the EEA, the data controllers will ensure appropriate safeguards are in place.

Your rights in relation to your data.

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. If you wish to request copies of your personal data please contact the data controller at the address above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the 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 the Trustees may not be able to perform their duties in relation to the Plan and your benefits could be affected.

Further details about GDPR and your rights under GDPR can be found on the ICO's website at <https://ico.org.uk/>.