

Privacy Notice

The Baillie Gifford & Co Staff Pension Scheme is committed to protecting the privacy and security of personal information entrusted to us.

This Privacy Notice is for:

- active members;
- deferred pensioners;
- 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;
- non-members who have submitted enquiries;
- current and former advisers and service providers; and
- the current trustee and former trustees or trustee directors.

This notice describes how we as a "data controller" collect and use personal information about you during and after your relationship with us, in accordance with current U.K. data protection law, including (but not limited to) the General Data Protection Regulation (U.K. GDPR), the Data Protection Act 2018 and any superseding legislation.

If you have any questions regarding this policy or about our privacy practices, please contact us at: BaillieGiffordScheme@barnett-waddingham.co.uk or by writing to us at ProPensions Limited, 2nd Floor, Clyde Offices, 48 West George Street, Glasgow G2 1BP.

Who are we?

When we say 'we' or 'us' in this Privacy Notice, we are referring to ProPensions Limited, as the Trustee of the Baillie Gifford & Co Staff Pension Scheme. We can be reached at 2nd Floor, Clyde Offices, 48 West George Street, Glasgow G2 1BP.

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.

In order to run the Scheme for our members effectively, we appoint a Scheme Actuary to calculate the value of the Scheme's assets and liabilities based on its membership profile and to set employer contribution rates based on that information. The Scheme Actuary role is undertaken by an actuary employed by Mercer Limited and related services are provided by Mercer Limited. Both the Scheme Actuary and Mercer Limited may need to use your personal data in relation to instructions from the Trustee of the Baillie Gifford & Co Staff Pension Scheme or where the processing relates to his/her/Mercer Limited's statutory or regulatory obligations. When the Scheme Actuary and/or Mercer Limited are using your personal information in connection with the provision of these actuarial services or in relation to their own statutory or regulatory obligations, the Scheme Actuary and/or Mercer Limited will be independent data controllers of your personal data in their own respective rights, owing duties to you as data controllers in accordance with current U.K. data protection law. In such circumstances, your personal information will only be used in connection with the provision of these actuarial services or in connection with the Scheme Actuary's and/or Mercer Limited's statutory or regulatory obligations.

Information on the Scheme Actuary and/or Mercer Limited's own, independent, data processing activities when acting as independent data controllers can be found here: <https://www.mercer.com/en-gb/footer/mercerc-privacy-notice-relating-to-uk-actuarial-services/>.

What kind of information do we hold about you?

We may collect, store, and use the following categories of personal information about you:

- Personal details such as name; membership/reference number; address (including former addresses); contact details (including telephone numbers and e-mail addresses); date of birth; sex; 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 records including employment history, information regarding periods of pensionable service (including periods of absence), salary data;
- Financial details including your bank account details; salary information; tax and National Insurance information; and
- Pension information including defined benefits contributions (contributions paid to the Scheme, 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).

If you are a trustee or former trustee or trustee director, we may hold personal data about you in those capacities including name, address, contact details, passport or identification card details and information relating to actual or potential conflicts of interest.

If you are an adviser or service provider we may hold personal data in relation to the provision of services to us including name, address, contact details and bank account details.

Special Categories of Personal Data

We may also collect, store and use information about your health, including any medical conditions.

Such special categories of personal data will only be processed for the purposes of establishing eligibility for benefits, the calculation and payment of those benefits and demonstrating our past compliance with our duties.

How is your personal information collected?

We may collect personal data:

- directly from you through your participation in the Scheme, when you correspond with us by phone, e-mail or otherwise or when you provide us with any additional information, for example, through the online portal, when you attend worksite presentations, roadshows or other events, when you are appointed as a trustee/ trustee director or when we appoint you as a service provider;
- from third parties such as our service providers (for example, our Scheme administration provider or Scheme Actuary), the employer Baillie Gifford & Co, another pension scheme if you have transferred benefits, where a member includes your details in a form such as an expression of wish form, 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); and
- from regulatory authorities (such as The Pensions Regulator) or government departments (such as HMRC or the Department for Work and Pensions).

How we will use information about you

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);
- Calculate and perform a reconciliation of contributions;
- 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 and other legal or regulatory duties to which the Trustee is subject;
- Prepare Scheme accounts, audits and/or The Pensions Regulator Scheme return;

- 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, other insurance products or longevity protection;
- Purchase annuities, other insurance products or longevity protection;
- Demonstrate our past compliance with our duties;
- Establish your identity;
- Pay fees and expenses owed;
- Carry out the general administration functions of the Scheme (for example, to ensure documentation is properly executed and drafted, trustees and trustee directors are validly appointed, conflicts of interest are identified and managed and/or appropriate records are maintained);
- Provide access to online Member self-service options; and
- Communicate with you in an emergency, such as an information security breach at our Scheme administration provider or any other provider, where we want to engage with you quickly to mitigate any financial risk to you flowing from that breach. For this purpose, our Scheme administration provider maintains a list of the latest member email addresses available to us, whether ingathered in connection with online portal use, in response to member newsletters asking for the provision of emergency email addresses from members, or otherwise e.g., from day-to-day interactions with members or their updating of their contact information on the online portal. We will also use the Scheme website to communicate with you in an emergency and you can access it here: <https://schemedocs.com/baillie-gifford-and-co-statement-investment-principles.html>

UK Pensions Dashboard

In compliance with the new UK Pensions Dashboard requirements, the Scheme administrator will share relevant personal data with the Pensions Dashboard to facilitate the provision of a comprehensive view of your pension entitlements. This includes ensuring that your data is accurate and up-to-date for display on the Dashboard. We will only share the necessary information required by the Dashboard and ensure that all data transfers are conducted securely and in compliance with data protection laws.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law or regulation.

What is our legal basis for using your information?

We must by law provide benefits in line with the Scheme's governing documents and must also meet other legal requirements when looking after the Scheme. We will use your personal data to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud. We may need to share your personal data with other people for this reason, such as courts and law-enforcement agencies.

We also have a legitimate interest in properly looking after the Scheme. This includes paying benefits as they fall due; buying insurance contracts; direct-debit instruction checks; communicating with you; and ensuring that correct levels of contributions are paid, that benefits are correctly calculated, and that the expected standards of Scheme governance are met (including standards set out in The Pensions Regulator's guidance).

We also have a legitimate interest in providing you with a high quality service including supporting your retirement journey and presenting your options at retirement.

If we need to use information about your health (or other very personal and private information), we may ask your consent when we collect that information. 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 any benefits that may be payable under the Scheme. If you have given us your consent, you can withdraw your consent at any time by using the details below in the 'Contact Us' section. This may affect what we can do for you, unless we have another lawful reason for using your information.

We may also transfer your personal data if you have given us your consent, for example, to transfer your personal data to a new scheme.

Sometimes your personal data may be used for statistical research but only in a form that no longer identifies you.

How long will we hold your information for?

We will hold your personal data for as long as is necessary to ensure we can satisfy our legal obligations regarding the Scheme and pay any benefits due to you or dependants or concerning you.

We will retain your information for as long as is necessary to ensure that, if a query arises in the future about your benefits, whether from you or your beneficiaries or a third party, we have sufficient information to deal with that query. To meet this aim, most of the personal data that we hold will be kept for 10 years from the end of the Scheme year in which the last payment from the Scheme is made to you or in respect of you.

However, some information may be kept for more or less time depending on how long we reasonably think we need it to deal with our legal obligations mentioned above, and any queries or complaints.

Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction. But, given the nature of pension schemes, the Scheme may be required to keep some of your personal information for the rest of your life and for a period of time after that.

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

Data sharing

In order to administer the Scheme, we may from time-to-time share your personal data with various entities including: any new Scheme trustees and trustee directors, employers, any Scheme Actuary appointed by us (currently an employee of Mercer Limited); the employer of the Scheme Actuary as the provider of related actuarial services (currently Mercer Limited); any Scheme administrator appointed by us (currently Barnett Waddingham LLP), any Scheme secretary appointed by us (currently also Barnett Waddingham LLP), our professional advisers, our auditors, our insurers, HMRC, The Pensions Regulator, The Pensions Ombudsman and any other relevant body, 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, identity verification, pensions dashboard services, providing member services, print and mailing services, investment management, cloud hosting and data analytics.

If your benefits are transferred to another scheme or an insurer, we will also need to give the administrators of that scheme/insurer 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;
- Comply with our obligations in respect of any complaints raised under the Internal Dispute Resolution Procedure or any other complaints process;
- 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 U.K. to service providers, subcontractors and regulatory authorities for the purposes described in this Privacy Notice. If we do this, your personal information will continue to be subject to one or more appropriate safeguards set out in law, for example we may use model contracts in a form approved by regulators, or ensure that your personal data is protected through binding corporate rules.

Your rights

You have a number of rights in relation to your personal data. These include:

- Right to access your personal information. This means you have the right to transparency over how we use your data and to make a subject access request;
- Right to request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- Right to request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground;
- Right to request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- Right to object to (i) processing based on our legitimate interests and (ii) automated decision making and profiling;
- Right to request the transfer of your personal information to another party; and
- Right to claim compensation for material or non-material damage caused if we breach the data protection rules.

If you would like to exercise any of these rights, please contact us using the details set out below in the 'Contact Us' section. If you exercise any of these rights we may ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information. Where we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge except in exceptional circumstances.

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>).

If you wish to raise a complaint in relation to our processing of your personal data, you can contact our DPO at BaillieGiffordScheme@barnett-waddingham.co.uk or in writing at

ProPensions Limited
2nd Floor
Clyde Offices
48 West George Street
Glasgow
G2 1BP

Details of how we handle complaints related to our processing of your personal data are set out in the Scheme's Complaints Procedure, which can be requested from:

Baillie Gifford & Co Staff Pension Scheme
c/o Barnett Waddingham LLP
Seventh Floor
Cadworks
41 West Campbell Street
Glasgow
G2 6SE

BaillieGiffordScheme@barnett-waddingham.co.uk

Phone: 0333 1111 222

Any complaint made will be acknowledged within 30 days of receipt, and responded to fully without undue delay. If you are not satisfied with our response you have the right to refer your complaint to the U.K. data protection regulator, the Information Commissioner's Office. You can contact the Information Commissioner's Office at: <https://ico.org.uk/global/contact-us/>.

How you can access and update your information

We strive to maintain accurate, complete, and relevant personal information for the purposes identified in this privacy statement. If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it. It is important that the personal information we hold about you is accurate and current.

Data security

We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorised access, use, alteration and disclosure. These measures include:

- management and organisation of information security;
- classification of data which includes data handling rules;
- training on responsibilities connected to information security and the reporting of any information security incidents;
- physical and environmental security; and
- systems security, including backups, virus protection and access controls.

Our third party suppliers 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 policy or about our privacy practices, wish to exercise any of your rights or wish to make a complaint, please contact us at: ProPensions Limited, 2nd Floor, Clyde Offices, 48 West George Street, Glasgow G2 1BP.

Changes to this Privacy Notice

We may update this privacy notice from time to time, and will communicate such updates with you through publication on our website: <https://schemedocs.com/baillie-gifford-and-co-statement-investment-principles.html>. We will not do so where we believe this would materially impact your rights and freedoms: in those circumstances we will expressly notify you. We may also notify you in other ways from time to time about the processing of your personal information.

This Privacy Notice was last updated in June 2026