

George Barker and Company (Leeds) Limited Retirement and Death Benefits Scheme - Privacy Notice

This Privacy Notice has been issued by the Trustees and Scheme Actuary of the George Barker and Company (Leeds) Limited Retirement and Death Benefits Scheme (the Scheme) to comply with UK data protection laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Please note, the Scheme's Independent Trustee (PAN Trustees UK LLP ("PAN")) may continue to hold personal data collected through its role as a Trustee even when it is no longer a Trustee of the Scheme. Information about PAN's approach in this situation to data security as a firm can be found at <https://www.pantrustees.co.uk/Scheme-GDPR/>

Data controllers

The Trustees of the Scheme are PAN Trustees UK LLP, represented by Andrew Firbank, together with Christopher Wilkinson and David Wormald. The Scheme Actuary to the Scheme is Rose Fell of Barnett Waddingham LLP.

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustees and Scheme Actuary of the Scheme are considered "joint data controllers" (the holders, users and processors of personal data) for the purposes of the GDPR. It is possible that in some circumstances other professional advisers may be considered to be data controllers. This might include the Scheme's auditor or legal advisers.

The joint data controllers can be contacted as follows:

Barnett Waddingham LLP, First Floor, City Square House, 11 Wellington Street, Leeds, LS1 4DL
Email: GeorgeBarker@barnett-waddingham.co.uk
Telephone: 0333 11 11 222

Use, transfer and storage of personal data

In the course of running the Scheme, we 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 Scheme's administrators to determine the benefits payable to you and your beneficiaries. Such sensitive information will normally only be held with your consent. In circumstances where we cannot reasonably obtain your consent, we will process this information under the 'occupational pensions' exemption provided for by UK data protection law.

In addition, we 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 Scheme).

- Salary and data relating to investments and pension assets held outside of the Scheme (to the extent they are relevant for the calculation and payment of your benefits, or to the taxation of your benefits from the Scheme).
- 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 or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and to your membership of the Scheme. Your personal data will be stored until such time as we no longer need it but in any event for not longer than 15 years after the date the Scheme is wound up. When no longer needed, the Trustees will ensure that any personal data is securely destroyed.

The Trustees share your data with the Scheme's administrator Barnett Waddingham LLP, Scheme Actuary, the sponsoring employer, its legal advisors and Additional Voluntary Contribution (AVC) providers. They may also share data with the Trustees' other professional advisers (including the Scheme Auditor and pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator).

The Trustees may also share your personal data with one or more insurance companies or other third party providers of pension de-risking solutions (and their professional advisers) for the purposes of assessing, pricing, implementing and administering risk management exercises for the Scheme such as insuring Scheme benefits. This may include the provision of data necessary for insurers to carry out due diligence, underwriting, quotation exercises and subsequent policy administration. The sharing of your data for these purposes would be carried out in pursuit of the Trustees' legitimate interests in securing the benefits promised by the Scheme and managing the long-term risks associated with the Scheme."

The Trustees share your data with the employer for the purposes of providing information to the members about access to pension freedoms (either via a one-off exercise or as a business as usual offering) or other incentive exercises (such as a Pension Increase Exchange exercise whereby members are offered the option to exchange future pension increases for a higher non-increasing pension).

Your data may be shared by the Scheme'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.

All such advisors and service providers have to ensure that they protect your personal data and only use your personal data in line with principles set out in data protection laws. The Trustees have written agreements in place with their appointed advisers and suppliers to ensure their compliance with data protection laws and regulation.

The Scheme 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 Scheme in accordance with the Trust Deed and Rules and UK law. 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 Scheme
so that the correct benefits can be paid

- Undertake risk-management exercises which may include exploring, evaluating and implementing de-risking or settlement transactions, including buy ins with insurance companies, to reduce long term funding and investment risk and to enhance the security of members' benefits
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 Scheme. 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 UK law, including the Pensions Act 2004.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustees.

Some of the parties the Trustees share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for your personal information but in other countries, the parties involved will ensure there are adequate safeguards (such as the ICO's International Data Transfer Agreement or Addendum) in place. You can obtain a copy of these safeguards on request.

Pension dashboards

Pension schemes are legally required to connect to the pension dashboards ecosystem no later than 31 October 2026 and to respond to 'Find' and 'View' requests. This results in additional purposes for which your personal data will be processed.

This includes:

- Responding to 'Find' and 'View' requests submitted via a pension dashboard pursuant to the Pensions Schemes Act 2021 and Pensions Dashboards Regulations 2022; and
- Matching your personal data against requests generated within the pension dashboards ecosystem.

These activities are necessary for the Trustees to comply with their legal obligations and are carried out in accordance with the staging guidance issued by the Department for Work and Pensions (DWP) and the Pensions Dashboards Programme.

In addition to the data recipients already listed in this Privacy Notice, your personal data may be shared with:

- The Pensions Dashboards Programme ("PDP"), operated by the Money and Pensions Service.
- The central digital architecture ("CDA"), which routes dashboard data securely.
- The pensions dashboard service selected by you.

This sharing is strictly for statutory compliance and is subject to security and governance requirements set by DWP and PDP.”

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 receive and transmit a portable copy of your data for your own purposes, but only for data where our processing is based on your consent or the performance of a contract.

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 Scheme, and your benefits could be affected. When you exercise a right, we may need to take steps to verify your identity, and we may rely on exemptions provided for by law to decline part or all of your request.

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

Complaints

Under the Data (Use and Access) Act 2025 you have a right to complain directly to Data Controllers about the handling of your personal data. Any complaint will be acknowledged within 30 days of receipt and will be investigated and responded to without undue delay. Please use the contact details above to submit any data protection complaint.

If you are not satisfied with our response to your complaint (or to any response from the Trustees to any other request in relation to your personal data) you can make a complaint to the ICO. Its contact details are:

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

Telephone: 0303 123 1113 or 01625 545 745

Updates to this notice

The Trustees may update or amend this privacy notice from time to time to comply with the law or to meet changing business requirements. Any future changes made to the privacy notice will only be made available at the following website: [George Barker & Company \(Leeds\)](#)

This privacy notice was last updated on 8 June 2026.