



Dear Member

Lotus Pension Plan (“the Plan”): Privacy notice – June 2026

Lotus Pension Trustees Limited (the “**Trustee**”) needs personal information about you in order to run the Plan. In legal terms we are ‘data controllers’ and we are required to tell you some things about the personal information we have about you, how we use it and what your rights are in relation to it. This privacy notice is being issued to you to comply with UK data protection laws. The current UK data protection laws are set out in the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025.

The requirement also applies to the Plan’s Actuary, Edward Spencer of Barnett Waddingham LLP, who is a joint data controller.

Collection of your information

The type of information held could include details such as date of birth, gender, address, employment periods, salary, pension amounts, marital status and national insurance number.

If you have used a pensions dashboard, we may hold and process information about you, such as an electronic pensions identifier and personal data supplied by you. This information helps us locate your Plan pension and display information about it on the dashboard.

The information may be obtained directly from you or in some cases, the above information may also be collected from other sources such as your employer or HM Revenue & Customs. Where applicable, we also collect information about your nominated beneficiaries, dependants or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

In some instances, we may need to hold and process information relating to your physical or mental health, for example if you are applying for a pension on the grounds of ill-health. We will ask for your explicit consent to this, unless there is an alternative legal basis for processing this information under the UK data protection laws. Once you have given your consent, you can withdraw it at any time by writing to us using the contact details below.

Using your information in accordance with UK data protection laws

UK data protection laws require us to meet certain conditions before we are allowed to use your personal information in the way described in this privacy notice.

We rely on a condition that allows us to use your personal information to comply with our legal obligations in relation to the Plan. We also rely on a condition known as ‘legitimate interests’ in order to use this information in the way described in this privacy notice. We have legitimate interests in collecting and processing your personal information as we need this to administer the Plan and to provide benefits for you and your dependants (described in more detail below).

We will keep the amount of personal information collected and the extent of any processing to a minimum.

How we use your information

We use your information for the purpose of carrying out our respective roles in relation to the Plan. This is to ensure that the correct benefits can be paid to you in accordance with the Plan’s Trust Deed and Rules. The Plan 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. Our use of your information as described above is permitted by applicable UK data protection law because it is a legal obligation.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to record, calculate or pay your or your beneficiaries' benefits.

We will only process 'sensitive' or 'special categories' of personal information under the UK data protection laws (e.g. information about your health) where you have explicitly consented to this or where there is an alternative legal basis for processing this information under the UK data protection laws. This may mean that you will be asked to sign consent forms in the future. If you don't consent to our processing this information when asked to do so, it may mean that we are unable to pay benefits to you or your dependants. Once you have given your consent, you can withdraw it at any time by writing to us using the contact details below.

We will only process information about criminal convictions if these relate to money owed to the Plan's employers in circumstances where they are entitled to be reimbursed from your benefits and either you consent to this or the processing is necessary for the exercise of a legal claim.

Disclosure of your information

The Trustees may share your information with other service providers, regulatory authorities or as required by law. We may also share personal data with a qualifying pensions dashboards provider or the Money and Pensions Service to ensure your information is available to be viewed via a dashboard service. We may also share your information with a third party integrated service provider (which facilitates the Plan's connection to the pensions dashboard ecosystem) to enable us to comply with our pensions dashboard duties.

Please note, the Plan'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 Plan. Information about PAN's approach in this situation to data security can be found at <https://www.pantrustees.co.uk/Scheme-GDPR/>.

Where we store your personal information

The Trustees do not generally, and have no intention, to transfer or process the personal data that they collect about you outside the UK. However, if you live or work outside of the UK, we may need to transfer data outside of the UK to respond to any queries that you may have. Data may also need to be transferred outside the UK if at any time the Plan's service providers were to host data outside the UK. Where this applies, we will take all steps reasonably necessary to ensure that all data is treated securely and in accordance with this privacy notice.

These transfers will be governed by UK data protection laws. We may transfer data outside the UK to a country which the UK government considers ensures a level of protection that is not materially lower than UK standards. This would include countries within the European Economic Area (EEA). If the transfer is not approved by the UK government, we may only transfer data if appropriate safeguards are in place and we consider that the level of protection provided for data subjects is not materially lower than UK standards. You may contact us using the details below if you would like more information about these safeguards.

Retention of your information

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

Your rights

You have rights under data protection law in relation to the way we process your personal data, namely:

- to access your data;
- rectification of your data where it is inaccurate or incomplete;
- erasure of your personal data (in certain circumstances);
- to restrict its processing (in certain circumstances); and
- (in some circumstances) to require certain of your information to be transferred to you or a third party.

You also have rights under data protection law to object to the processing of your information on

grounds which we have said are necessary for our legitimate interests (see above).

Please note that we may be unable to delete or remove your data whilst we still need this to administer the Plan.

If you have any questions or wish to exercise any of the above rights, you can contact the Plan Administrator, Sanderson Law Pensions Management at Lodge Park, Lodge Lane, Langham, Colchester, CO4 5NE.

How to make a complaint

If you are not happy with the way in which your personal information is held or processed or believe that your data protection rights have been infringed, you have the right to raise a complaint with us.

You can make a complaint using the following contact details:

Lotus Pension Trustees Limited
c/o Chair of Trustees
PAN Trustees
Oathall House
Oathall Road
Haywards Heath
West Sussex
RH16 3EN
Email:RaymondeNathan@pantrustees.co.uk

We aim to resolve complaints as quickly as possible and within a reasonable time frame, taking into account the nature and complexity of your complaint.

If you are not happy with our response, you can also lodge a complaint with the office of the Information Commissioner (the ICO). The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (www.ico.org.uk). You can contact the ICO using the following details

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow:
Website: <https://ico.org.uk/make-a-complaint/data-protection-complaints>
Telephone: 0303 123 1113

Last updated: June 2026