Valid from September 2026

PRIVACY NOTICE

for the Cosworth Racing Limited Pension Fund (the "**Fund**")

This privacy notice has been prepared by the Trustee of the Cosworth Racing Limited Pension Fund ("**Trustee**", or "we"). The Trustee is registered as a controller of personal data with the Information Commissioner's Office ("**ICO**").

This notice will also be made available online on the Fund's web page, https://pensioninformation.aon.com/cosworthracing

This privacy notice replaces the previous general privacy notice dated 1 October 2022 and supplements any other notices and statements we issue that are specific to particular data collection / processing activities.

Why we are providing this notice to you

As the Trustee of the Fund we hold certain information about you and from which you can be identified (either from the information itself or with other information that we may hold) ("**personal data**"). In line with the transparency requirements of applicable data protection laws, we are required to give you specified information about the personal data we hold about you, how we use it, and the safeguards that are in place to protect it. This notice is designed to give you that information.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information. Please note, that PAN Trustees UK LLP, the professional trustee acting as Trustee to the Fund, may continue to hold personal data even when it is no longer a trustee of the Fund. In such circumstances, PAN Trustees UK LLP will hold and use personal data collected through its role as a trustee of the Fund in accordance with its privacy notice located at https://www.pantrustees.co.uk/Scheme-GDPR/.

Why we process your personal data

The Trustee processes personal data about you, in its role as controller, for the proper handling of all matters relating to the Fund, including its administration and management, calculating, securing and paying benefits and managing liabilities in relation to it.

Details regarding how and why we process your personal data and the legal bases relied on by the Trustee when carrying out this processing are set out in the Schedule. The Schedule also provides information concerning the conditions that we rely upon when processing "special categories" of particularly sensitive personal data (including personal data concerning health).

What personal data we hold and how we obtain it

Please refer to the Schedule for information concerning the types of personal data we may hold and process about you.

We obtain some of this personal data directly from you. We may also obtain data from your current or past employer(s) or companies that succeeded them in business (for example salary information), from a member of the Fund (where you are or could be a beneficiary of the Fund as a consequence of that person's membership), and from a variety of other sources including data tracing agencies, public databases, our advisers, additional voluntary contribution (AVC) arrangement providers, and government or regulatory bodies**.**

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Fund, please ensure that those individuals are aware of the information contained within this notice.

How we will use your personal data

We may use this data to deal with all matters relating to the Fund, including its administration and management. For further information, please refer to the Schedule.

Organisations that we may share your personal data with

From time to time, we will share your personal data with our advisers and service providers so that they can help us carry out our duties, rights and discretions in relation to the Fund. These include the following advisers and service providers (for some advisers/providers we have provided links facilitating access to their privacy notices, which provide information about how they address their obligations in relation to personal data).

- The Fund administrator, currently Aon Solutions UK Limited ("**Aon**"), whose privacy notice can be found via https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp
- The legal advisers to the Trustee, currently Squire Patton Boggs (UK) LLP whose privacy notice can be found via https://www.squirepattonboggs.com/en/footer/privacy
- The secondary legal advisers to the Trustee, who advise the Trustee on certain projects, currently Gunnercooke LLP, whose privacy notice can be found via httsp://gunnercooke.com/privacy-policy/
- The Fund actuary, currently Richard Robinson of Aon. For further details on how Richard Robinson and Aon as the Fund's actuarial advisers use your data, please contact them. For more information please refer to the Aon privacy notice at Schedule 2.
- The Fund auditors, currently Ensors Accountants LLP ("**Ensors**"). For further details on how Ensors as the Fund's auditor uses your data, please contact them. Their contact details can be found at https://www.ensors.co.uk/contact-us/, whose privacy policy can be found via https://www.azets.com/en/privacy
- The Fund's additional voluntary contribution providers, currently Prudential and Legal and General. For further details on how Prudential and Legal and General as the Fund's additional voluntary contribution providers use your data, please contact them. Their contact details can be found at https://www.pru.co.uk/existing-customers/products/additional-voluntary-contributions/ and https://www.legalandgeneral.com/pensions-retirement/
- Tracing bureaus for mortality screening and locating members and beneficiaries
- The Trustee's insurers, currently Legal and General Assurance Society Limited and Phoenix Life. For further details on how Phoenix Life as the Fund's insurer uses your data, please contact them. Their contact details can be found at http://www.phoenixlife.co.uk/
- The Trustee's meeting board pack providers, currently Diligent. For information on how Diligent uses your data as the Trustee's meeting board pack provider, they can be contacted via the details found at https://diligentboards.com/
- Investment advisers
- Communications advisers
- The Fund's banks
- Suppliers of IT

- Payroll providers
- Dashboards ISP

In some instances, advisers and service providers will be controllers in their own right and will be directly responsible to you for their use of your personal data. They may be obliged under the data protection laws to provide you with additional information regarding the personal data that they hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers directly, for example, via their websites. Whenever one of our advisers or service providers acts as a joint controller with us in respect of your personal data, because we jointly determine the purposes and means of processing it, we will agree with them how we are each going to meet our respective and collective obligations under the data protection laws. If you would like more information about how such an arrangement works, please contact us using the contact details below.

We may also provide some of your data to the Fund's sponsoring employers (including Ford Motor Company Ltd) and group companies of those employers, their advisers and potential purchasers of their businesses.

In addition, where we make investments or seek to provide benefits for Fund members and other beneficiaries in other ways, such as through the use of insurance or pension scheme mergers, then we may need to share personal data with providers of investments, insurers and other pension scheme operators.

The advisers, service providers and organisations referred to in the paragraphs above may use personal data to perform their functions as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties (for example, insurers may pass personal data to other insurance companies for the purpose of obtaining reinsurance), to the extent they consider it appropriate to do so.

Where requested or if we consider that it is reasonably required, we may also provide your personal data to:

- the Pension Protection Fund; and
- government bodies, regulators and dispute resolution and law enforcement organisations (including the courts, The Pensions Regulator, the Pensions Ombudsman, and HMRC).

They may then use the data to carry out their functions.

Pensions dashboards

The Trustee may process your personal data in order to meet their legal obligations relating to pensions dashboards. This includes advance processing to prepare for the introduction of pensions dashboards and connect the Fund to the pensions dashboards system, as well as ongoing processing once pensions dashboards are made available to the public.

A pensions dashboard is an online tool which will enable individuals to view basic information about their pension savings from multiple pension schemes (excluding pensions already in payment). If an individual submits a request for information via a pensions dashboard, the data within that request will be matched against the personal data that we hold. If we can confirm that the request has been made by a Fund member, and that member’s pension has not yet started to be paid, then information about the pension may be made available to the member via the pensions dashboard. If we are uncertain whether the individual is entitled to a pension from the Fund then we may carry out further data processing to verify whether such an entitlement exists. For further information about pensions dashboards, please refer to the Pensions Dashboards Programme website (https://www.pensionsdashboardsprogramme.org.uk).

Transferring personal data outside the UK

In some cases, recipients of your personal data may be outside the UK. This may include the Fund's sponsoring employers and in each case, their professional advisors, as applicable. It may also include affiliates / overseas offices of the Fund's service providers, including. This means your personal data may be transferred outside the UK to a jurisdiction that may not offer an equivalent level of protection as is provided in the UK.

Additional safeguards are in place to protect your personal data when we (or service providers who process personal data on our behalf) transfer it outside the UK as at least one of the following measures is relied on:

- the UK Secretary of State has, by regulations, approved transfers of personal data to the country or international organisation that the personal data is being or has been transferred to; or
- standard data protection contractual clauses (which have been approved by the UK Secretary of State, the ICO or the relevant governmental or supervisory authority) are in place with the recipient of the data, requiring your personal data to be safeguarded in accordance with applicable laws.

Please contact the Trustee using the contact details below, if you require further information about the safeguards that have been adopted or would like to request (free of charge) a copy of applicable standard contractual clauses that we use in relation to the processing of your personal data.

How long we keep your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purposes identified above and detailed further in the Schedule. In practice this means that we will retain your data for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Fund and for such longer period as may be required to deal with any questions, complaints or claims that we may receive about our administration of the Fund. We may also retain your data for a longer period to comply with our legal and regulatory obligations.

Your rights

You have a right to **access** and **obtain** a copy of the personal data that the Trustee holds about you, and to ask the Trustee to **correct** your personal data if there are any errors or it is out of date or incomplete.

You have a right to ask the Trustee to **erase** your personal data where it is being processed on a legal ground other than for complying with a legal obligation and where:

- you believe we no longer need to process the personal data for the purposes identified above and detailed further in the Schedule;
- you had given consent to the processing of the personal data but you subsequently withdraw your consent and there is no other lawful basis upon which we can process the personal data;

- the personal data has been processed unlawfully or it has not been erased when it should have been; or
- you have been successful in objecting to the processing.

In some cases, you may also have a right to request that the processing of your personal data be **restricted** or to **transfer** your personal data (for example, to another pension scheme).

In certain circumstances, you also have the right to **object** to the processing of your personal data, for example:

- where we rely on legitimate interests as our lawful basis for processing; in which case, we must carry out an exercise balancing our legitimate interests with your rights and freedoms as a data subject (if you disagree with the outcome of that balancing exercise you have the right to refer the matter to the ICO (or the Information Commission, if it has taken over the functions of the ICO)); or
- where the processing is for direct marketing purposes.

Where we rely upon your consent to lawfully process your personal data, including explicit consent, you have the right to **withdraw your consent** to the processing at any time by notifying the Trustee in writing. Withdrawal of consent will not affect the lawfulness of processing based on your consent before it is withdrawn.

You have the right to **make a complaint to us** if you consider that, in connection with your personal data, there is an infringement of data protection legislation.

You can obtain further information about these rights from the ICO at: www.ico.org.uk or via its telephone helpline (0303 123 1113).

If you wish to exercise any of these rights (including your right to make a complaint to us) or have a query or concern regarding the processing of your personal data, please contact the Trustee using the contact details provided below.

You also have the right to **make a complaint to the ICO** (or the Information Commission, if it has taken over the functions of the ICO) if you consider that that, in connection with your personal data, there is an infringement of data protection legislation - you can do this via the ICO's website or telephone helpline (referred to above).

As explained in this privacy notice, one of the reasons we collect and hold your personal data is to administer your Fund benefits. If you do not provide the information we request, withdraw your consent to the processing, or ask that the personal data we already hold is deleted or that the processing of the personal data be restricted, this may affect our ability to administer your benefits (including the payment of benefits from the Fund) or consider your applications or complaints concerning the Fund. In some cases it could mean the Trustee is unable to put your pension into payment or has to stop your pension (if already in payment).

Updates

We may update this notice periodically. Where we do this, we will inform you of the changes and the date on which the changes take effect.

Contacting the Trustee

Please contact the Trustee for further information using the contact details below.

The Trustee of the Cosworth Racing Limited Pension Fund

c/o PAN Trustees UK LLP

The Annex

Oathall House

Oathall Road

Haywards Heath

West Sussex

RH16 3EN

Email: info@pantrustees.co.uk

Fund Administrator Contact Information

Please contact the Fund administrator for further information using the contact details below.

Cosworth Racing Limited Pension Fund

Aon

PO Box 196

Huddersfield

HD8 1EG

Telephone: 0800 085 4010

Email: cosworthmailbox@aon.com

SCHEDULE 1

How and why we process your personal data

There are six lawful bases for processing personal data under the UK GDPR and the Trustee (**"we"**, **"us"** or **"our"**) must rely on at least one of these whenever we process your personal data. The six lawful bases are summarised below.

No	Lawful Basis	Description
1	Consent	You have consented to us processing your personal data for one or more specific purposes.
2	Contract	The processing is necessary for the performance of a contract which you are a party to, or in order to take steps at your request prior to entering into a contract.
3	Legal obligation	The processing is necessary for compliance with our legal obligations as a trustee of an occupational pension scheme.
4	Vital interests	The processing is necessary in order to protect your vital interests or those of another person (vital interests are interests that are essential for someone's life, for example, emergency medical care).
5	Public task or official authority	The processing is necessary for the performance of a task in the public interest or so that we can exercise any official authority that we have vested in us.
6	Legitimate interest	The processing is necessary for legitimate interests pursued by us or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests.

Our legal grounds for processing your personal data are set out in the table below. If you have any comments or concerns about our use of your personal data (including as described below) please contact us directly via the contact details set out above.

PRIMARY USE OF YOUR PERSONAL DATA	PERSONAL DATA WE MAY HOLD	EXAMPLE USES OF YOUR PERSONAL DATA	LAWFUL BASIS RELIED ON FOR PROCESSING

Administering and managing the Fund and the liabilities under it	Name, date of birth, sex, gender, address, telephone number, email address, details concerning your authorised representatives, national insurance number, employee and membership/reference numbers and copies of documentation verifying your identity. ("**General Information**") Bank account details, tax details. **("Financial Information")**
	
	Information about your family and dependents, including your marital status, dependant details, next of kin, and information about your personal relationships. ("**Family Information**")
	
	Information submitted by you when using a pensions dashboard and generated in response to requests you have made via the pensions dashboard. (“**Pensions Dashboards Information**”)
	
	Information used to calculate and assess eligibility for benefits, such as details of pension contributions, employment history, length of pensionable service, Fund retirement date, salary/remuneration information, investment choices, preferences regarding the distribution of death benefits, benefits accrued in, paid out or transferred to/from this (and other) pension
		• To identify you.
		• To create an accurate member/beneficiary record on our systems.
		• To correspond with and answer queries from you, your authorised representatives, and your advisers.
		• To assess eligibility or continuing eligibility for benefits.
		• To calculate, adjust, allocate and pay benefits (including any benefits payable in the event of death, divorce or dissolution of a civil partnership).
		• To provide you with certain information which we either:
		  ○ are legally required to provide you with; or
		  ○ consider is relevant to you as a member of the Fund.
		• To report to and liaise with HMRC and facilitate the payment of any tax due in connection with your benefits.
		• Managing the investment of Fund funds and facilitating the investment of any money purchase pension savings you may have which are linked with the Fund (including in AVC arrangements).
		• To assess and, if appropriate, action a
			3 We have legal obligations to:
			• provide you (and anyone else with an entitlement) with the correct level of benefits under the Fund;
			• comply with tax and contracting-out legislation and deduct the correct level of tax from benefits; and
			• manage and administer the Fund in accordance with its governing documents and applicable legislation.
			
			6 The processing is necessary for the legitimate interests of administering and managing the Fund and the liabilities under it.
			
			Where Health Information is being processed, please refer to **Note 1** below.
			
			Where Criminal Information is being processed, please refer to **Note 2** below.
			
			If and to the extent that we are processing personal data

PRIMARY USE OF YOUR PERSONAL DATA	PERSONAL DATA WE MAY HOLD	EXAMPLE USES OF YOUR PERSONAL DATA	LAWFUL BASIS RELIED ON FOR PROCESSING
	arrangements, tax and contracting-out records. ("**Benefit Information**") Additional personal data that we request from you in order to action a request from you to transfer your benefits out of the Fund. (**"Transfer Information"**) Personal data concerning your health, or the health of another who may receive benefits as a consequence of your membership or benefits in the Fund. ("**Health Information**") Personal data relating to criminal convictions and offences. ("**Criminal Information**")	request you make to transfer your benefits out of the Fund. • To identify your potential benefit options and, where relevant, implement those options. • To calculate and reconcile contributions paid or payable. • Ensuring compliance with requirements arising from members of the Fund contracting-out of the State Second Pension. • Preparation of Fund accounts, valuations and audits. • The provision and collection of information via the Fund's administration portal • To allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements. • To manage the Fund's liabilities, including the entering into of insurance arrangements, arranging for insurers to take over responsibility for the payment of benefits, and the selection of Fund investments. • For statistical and financial modelling and reference purposes. • To liaise with, or respond to orders or	regarding a spouse, civil partner or partner and this personal data also reveals an individual's sexual orientation, please refer to **Note 3** below.

PRIMARY USE OF YOUR PERSONAL DATA	PERSONAL DATA WE MAY HOLD	EXAMPLE USES OF YOUR PERSONAL DATA	LAWFUL BASIS RELIED ON FOR PROCESSING
		requests from ○ the Pension Protection Fund; and ○ government bodies and dispute resolution and law enforcement organisations, including the courts, The Pensions Regulator, The Pensions Ombudsman, and HMRC. • To comply with our legal obligations in respect of pensions dashboards, including connecting our systems to the pensions dashboards digital architecture and responding to requests submitted via a pensions dashboard. •	
Addressing any actual or potential disputes or complaints relating to the Fund or connected with your membership or benefit entitlements under the Fund	• **General Information** • **Financial Information** • **Family Information** • **Benefit Information** • **Transfer Information** • **Pensions Dashboards Information** • **Health Information** • **Criminal Information**	To respond to or deal with any queries, concerns and disputes which relate to the Fund, your membership of or benefit entitlements under the Fund. This shall include actual or potential disputes raised under the Fund's Internal Dispute Resolution Procedure, or with The Pensions Ombudsman or the courts.	**3** We have legal obligations to: • put in place and observe a formal procedure and process to investigate and decide upon disputes relating to the Fund, in respect of persons with an interest in the Fund; • facilitate complaints regarding infringements of data protection legislation; • engage with formalities associated with proceedings brought before judicial bodies,

PRIMARY USE OF YOUR PERSONAL DATA	PERSONAL DATA WE MAY HOLD	EXAMPLE USES OF YOUR PERSONAL DATA	LAWFUL BASIS RELIED ON FOR PROCESSING
			including the Pensions Ombudsman and the courts; and • comply with directions or orders of judicial bodies. **6** The processing is necessary for the legitimate interests of investigating, pursuing and/or defending , actual or potential disputes. Where Health Information is being processed, please refer to **Note 1** below. Where Criminal Information is being processed, please refer to **Note 2** below. If and to the extent that we are processing personal data regarding a spouse, civil partner or partner and this personal data also reveals an individual's sexual orientation, please refer to **Note 3** below.

PRIMARY USE OF YOUR PERSONAL DATA	PERSONAL DATA WE MAY HOLD	EXAMPLE USES OF YOUR PERSONAL DATA	LAWFUL BASIS RELIED ON FOR PROCESSING
Liaison with current or former sponsoring employers of the Fund (including in connection with a corporate transaction)	• **General Information** • **Financial Information** • **Family Information** • **Benefit Information** • **Health Information** • **Criminal Information**	To correspond with the sponsoring employers of the Fund in connection with your employment, their obligations as employers, or changes to the Fund or benefits payable from the Fund. To process your personal data in connection with the sale, merger or corporate reorganisation of the employers that sponsor the Fund and their group companies	**6** Processing is necessary for the legitimate interests of: • enabling sponsoring employers to comply with their obligations as employers; and • addressing issues arising in relation to corporate transactions and reorganisations. Where Health Information is being processed, please refer to **Note 1** below. Where Criminal Information is being processed, please refer to **Note 2** below. If and to the extent that we are processing personal data regarding a spouse, civil partner or partner and this personal data also reveals an individual's sexual orientation, please refer to **Note 3** below.

Note 1

Where Health Information is being processed for the purpose of assessing eligibility for benefits from the Fund, we will rely upon the data subject's explicit consent as the lawful condition for that processing.

Where eligibility has been assessed and Health Information is retained for our own records, we will rely upon the following lawful conditions to carry out the processing, in addition to the lawful bases specified in the table above.

- The processing is necessary for the purposes of carrying out obligations and exercising specific rights in the field of employment and social security and social protection law.
- The processing is necessary for the establishment, exercise or defence of legal claims.

Note 2

Where Criminal Information is being processed, we will rely upon the following lawful conditions to carry out the processing, in addition to the lawful bases specified in the table above.

- The processing is necessary for the purposes of carrying out obligations and exercising specific rights in the field of employment and social security and social protection law.
- The processing is necessary for the purposes of establishing, exercising or defending legal rights.

Note 3

If and to the extent that we are processing personal data regarding a spouse, civil partner or partner and this personal data also reveals an individual's sexual orientation, we will rely upon the following lawful conditions to carry out the processing, in addition to the lawful bases specified in the table above.

- The processing is necessary for the purposes of carrying out obligations and exercising specific rights in the field of employment and social security and social protection law.
- The processing is necessary for the establishment, exercise or defence of legal claims.

SCHEDULE 2
Aon "QUICK READ" PRIVACY NOTICE

Aon (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the Fund. In doing so Aon will use personal data about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which Aon use personal data will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

Aon may also aggregate your personal data with other personal data and use this aggregated data for benchmarking, research and data analysis purposes in order to improve understanding of life expectancy and other demographic aspects relevant for assessing pensions and insured liabilities. Aon will anonymise your personal data or (where that is not feasible) depersonalise it before using it for these purposes.

Aon may pass your personal data to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal data is set out in Aon's full Privacy Notice. We recommend that you review this notice which is available online https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp or you can request a copy by contacting Aon, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH.