

GOODYEAR DUNLOP TYRES UK LIMITED PENSION PLAN

Personal information and what we do with it

As the Trustee of the Plan, we need personal information about you to run the Plan and pay benefits. In legal terms, as we are a 'controller' of this information, we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

What personal information we have

We hold the following types of personal information:

- Your name and previous or alternate names, date of birth, national insurance number ("NINO") and/or partial or "dummy" NINO and bank account information (where benefits are in payment).
- Your gender. We use this to understand how long you are likely to receive your pension for and as part of your addressee details if we write to you e.g. 'Mr, Mrs., Ms....' If you tell us that you wish to identify as a gender different from your birth gender we'd process this information too. More on this is below.
- Contact details (including your address, former address, phone number and email address).
- Details of benefits under the Plan, including contributions paid, service dates and projected benefits
- If your benefits from the Plan derive from your employment, details of your employer when you were building up benefits in the Plan, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information we might need to pay any death benefits due in relation to you;
- If your benefits from the Plan form part of a divorce settlement, details of that settlement.
- Personal details of any relatives or individuals you may have named as potential beneficiaries in the event of your death;
- Details of any contributions paid by you or on your behalf to the Plan, including Additional Voluntary Contributions;
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Plan;
- Correspondence received about you from HMRC, relating to periods of service when you may have been contracted out of the upper tier of the state scheme;
- Correspondence that we may have received about you from your appointed independent financial adviser; and
- Electronic "pension identifiers" for pensions dashboards (explained below)

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Plan or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Plan benefits. We would also need to process information given in any gender change certificate and information given by members (without a formal certificate) who identify with a different gender than their birth gender and want correspondence to reflect this.

We also have a legal obligation to carry out due diligence checks in the event of a pension transfer request, which may mean that we are obliged to ask you for additional information. For instance:

- If you wish to transfer to an occupational pension scheme, we have to request evidence that demonstrates an "employment link". This could include a letter from your employer confirming your employment, a schedule of contributions, payslips and bank statements (the bank account detail on your payslip might be different from the bank details we hold for you).
- If you request a transfer to an overseas pension scheme, we are legally obliged to check that you are resident in the same country as that scheme. This evidence might include utility bills, TV subscriptions, insurance documents relating to your overseas home, address, bank account and credit card statements, evidence of local tax being paid and registration of address with local doctors.

Pensions Dashboards

The government has created a framework for pensions dashboards, designed to help people access information about their pensions online in one place. As part of this, we are required by law to match certain members (who search on dashboards) with their pensions under the Plan. We must also provide certain pensions information to the dashboards ecosystem (including the

identity service, the pension finder service, the consent and authorisation service) so that it can be displayed when certain members ask to see it on a dashboard.

These activities may involve sharing member data with entities within the dashboards ecosystem, non-commercial dashboards and commercial dashboards and with the provider(s)/the integrated service provider(s)/administrator we appoint to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboards duties.

As part of these dashboards duties, we may also need to report information (which could potentially include personal data) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.

Where we get personal information from

Some of the information we have comes directly from you. We may also get information (such as your salary and length of service) directly from your employer. In addition, Aon, who administers the Plan on our behalf, may have obtained information from you and passed it to us.

Sometimes we get information from other sources, for example, another scheme if you have transferred benefits from that scheme, government departments such as HMRC and DWP and publicly accessible sources (e.g. the electoral roll or tracking and tracing services) if we have lost touch with you and we are trying to find you.

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.

Some of your personal data may be collected indirectly through the pensions dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service). Where we obtain personal data from the dashboards ecosystem, or during the process of matching members with their Plan benefits for dashboards purposes, we may retain that data to help demonstrate how and why we concluded that the person is a member entitled to receive information about their benefits on dashboards and to help us administer the Plan.

Our legal basis for using your personal information including how we share it

The Trustee must by law provide benefits in accordance with the Plan's governing documentation and must also meet other legal requirements in relation to the running of the Plan.

We will use your personal information 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 information with other people for this reason, such as courts and law enforcement agencies.

Pensions dashboards regulations impose a legal obligation on us to match certain members with their pensions and provide information on their pension benefits. Testing data and getting ready for pensions dashboards compliance can also be part of our legal obligations.

We also have a legitimate interest in properly administering the Plan. This includes paying benefits as they fall due, purchasing insurance contracts; communicating with you, testing data and getting ready for pensions dashboards compliance can also be part of our legitimate interests and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Plan governance are met (including standards set out in Pensions Regulator guidance). We make sure that your own interests are not outweighed or prejudiced by our legitimate interests. Where relevant, we may have a legitimate interest in processing your personal information to secure benefits with an insurer in accordance with the Plan rules. There is more information below about this.

In order to achieve this, we may share your personal information with various people, including any new trustees; employers; the Plan administrator; the Plan actuary; our professional advisers; auditors; insurers; integrated service providers (relevant to pensions dashboards compliance, as described above), pensions dashboards ecosystem (as described above), non-commercial dashboards and commercial dashboards; independent financial advisers; HMRC; DWP; the Pensions Ombudsman; the Pensions Regulator; the Information Commissioner; and IT and data storage providers and other service providers, such as printers who help us prepare communications which we send to members, and tracking and tracing services. If your benefits are transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

When we need to use information about your health we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use this information

without consent and we will do so where that is necessary for us to run the Plan in a sensible way. This applies to other very personal information too, such as information in a gender change certificate; information given by members (without a formal certificate) who identify with a different gender than their birth gender and want correspondence to reflect this; details about personal relationships relevant to who should receive benefits on your death. If we do ask for your consent you can withdraw your consent at any time by contacting us using our contact details (below). This may affect what we can do for you unless we have another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to us processing your health data for that, but then you withdraw that consent, we will usually be unable to consider your application. If you withdraw consent after our processing, this will not retrospectively affect the processing that has already happened.

Sometimes we need to use your special categories of personal data (examples as above) in order to establish, exercise or defend legal claims.

We may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Plan. Sometimes, your information may be used for statistical research but only in a form that no longer identifies you.

The Plan's employer may also have a legitimate interest in contacting you about your benefits under the Plan, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustee may share your personal information with the employer so that they can contact you for that purpose.

If you would like advice from an independent financial adviser (IFA) about your entitlements under the Plan, we'd need to share some of your personal information with them and we'd do that based on your consent (this means we'd ask you to opt-in to allow the sharing) or for our legitimate interests in running the Plan (this means we'd give you an opportunity to opt-out from the sharing). You'd know which lawful basis applies because we'd explain that in our correspondence with you, whether that's when you're nearing your planned retirement age or when the employer is offering to pay for impartial advice for members at other times (such as when there are additional options available, as mentioned above).

We may need to share personal data with insurers in relation to purchasing and pricing up insurance contracts called 'annuities' (unless that can happen based on anonymized data). Insurers will use that data to verify the assets and liabilities of the Plan. We may write to you before purchasing an annuity to ask for up to date information about your spouse/partner/children/other dependents to this end.

We will share your personal data when we purchase the annuity and at that stage the insurer will typically share information with its chosen re-insurer. Sometimes the insurer's privacy notice will mention who its re-insurer is and how to see its privacy notice (either giving you a link to it online or explaining where it can be seen or by providing a copy of it). The Trustee will usually need to write to members to explain about the particular annuity and who the insurer is. In this way you can know who holds your personal data and how to exercise your rights against them. This sort of information would typically be shared with insurers: Plan membership ID number; marital status and details about spouse/partner; DOB; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement.

Aon Solutions UK Limited and the Plan Actuary

Aon Solutions UK Limited and the Plan Actuary (together "**Aon**") have been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information 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 information 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 pass your personal information 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 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 information is set out in their full Privacy Notice. We recommend that you review this notice which is available online at <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, PO Box 730, Redhill, RH1 9FH.

How to contact the other people we give your personal information to

Some of the people we mention above just use your personal information in the way we tell them. However, others may make their own decisions about the way they use this information to perform their services or functions, or to comply with regulatory responsibilities as controllers in their own right. In this case, they are subject to the same legal obligations as us in relation to this information and the rights you have in relation to your information apply to them too.

If you want any more information from any of these recipients or to exercise any rights in relation to the information they hold, please contact us and we will put you in touch with them.

How long we keep your personal information for

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Plan (including if your data originated from the pensions dashboards ecosystem and if you were matched up with the Plan through that) and pay any benefits due to or in respect of you.

We keep your information for long enough for us to be able to administer the Plan and to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so.

To meet this aim, the majority of the personal information we hold will be kept for a period of several years after the last payment from the Plan is made to or in respect of you. However, some information may be kept for a longer or shorter period depending on how long we sensibly think we need it to deal with queries (from you or your beneficiaries or from other people who might ask us if they are entitled to payments), complaints (from you or them) and our legal obligations mentioned above.

Data from the pensions dashboards ecosystem is kept for the life of your member record, if we do find a match (i.e. if you are a member of the Plan).

If we don't find a match (i.e. if you're not a member of the Plan), we will delete the data from the dashboard straightaway.

If we find a potential match, we will keep the data from the dashboard for 30 days in a token form - this is a security step. During that 30 days we will determine whether there's a positive match, or no match. We will delete the data (i.e. the token) after 30 days if there is no match. We will keep the data for the life of your member record, if we do find a match within 30 days.

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise all of these rights free of charge except in some very limited circumstances and we will explain these to you where they are relevant.

The Plan Administrator's contact details for exercising these rights are set out below and they can supply more information about these rights to you on request.

Keeping your information safe

We take the protection of your personal information seriously and we have implemented technical, physical and organisational measures to ensure that personal information is kept accurate, up to date and protected against unauthorised or accidental destruction, alteration or disclosure, accidental loss, unauthorised access, misuse, unlawful processing and/or damage.

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK. Some countries already provide adequate legal protection for your personal information but in other countries, additional steps will need to be taken to protect it.

Transfers outside the UK can happen lawfully if:

- the personal information is transferred at the request and with the consent of the Plan member in relation to his/her own benefits (or those of a dependant or beneficiary, as appropriate);
- the country to which the personal information is being transferred is deemed to provide for adequate protection for personal data by the UK secretary of state and/or the UK's Information Commissioner who (depending on the circumstances) determine adequacy;
- an appropriate standard contractual clauses contract has been put in place with the third party/parties to whom the personal information will be transferred, containing appropriate safeguards in relation to it; or
- the transfer is within a group of companies who have obtained Binding Corporate Rules.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Queries and further information

If you want more information about what we do with your information and what your rights are, the Trustee can be contacted at:

Email: GoodyearDunlop.pensions@aon.com

Phone: 0330 123 9083 (lines are open Monday to Friday, 9am to 5pm)

Write to: Goodyear Dunlop Tyres UK Limited Pension Plan, Aon, PO Box 196, Huddersfield, HD8 1EG

If you have concerns about the way we handle your personal data, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.