## Trustees of the Moeller Electric Group Pension Scheme Privacy Notice (Fair Processing Notice)

**Updated April 2023** 

Your privacy is important to us. We will process your personal data in accordance with applicable data protection law.

The data controller in respect of the personal data you submit to us either directly or via your employer (Eaton Production International GmBH or Eaton Electric Sales Limited) is the Trustees of the Moeller Electric Group Pension Scheme (the "**Scheme**") who you can contact via moeller.pensions@aon.com. We use your personal data that is provided to us to administer and manage your pension and pay you or any person in respect of you the benefits provided by the Scheme.

We process the personal data that you provide or that your employer provides to us for the purpose of administering and managing your pension and paying you and/or your spouse and other dependants' benefits. We therefore process your personal data on the legal basis that the processing is necessary for the performance of the contract of employment between you and Eaton Production International GmBH or Eaton Electric Sales Limited regarding your participation in the Scheme, to comply with our legal obligations and our legitimate interests as trustees of the Scheme. If you or your employer do not provide us with the personal data that we specify is required for administration of the Scheme, then we may not be able to administer the benefits provided by it.

We will transfer your data to Eaton Production International GmBH, other participating employers in its group and their advisers, the Scheme's advisers, service providers including, but not limited to, the Scheme's appointed preferred Independent Financial Adviser and partner organisations to the extent that it is necessary for the management and administration of the benefits provided by the Scheme. We may also disclose your information to third parties in order to operate, administer and audit the Scheme responsibly, in the event that Eaton Production International GmBH or another participating employer sells its business or assets (in which case we may disclose your personal data to the prospective buyer), in the event that we decide to de-risk or insure any of the benefits provided by the Scheme (in which case we may disclose your personal data to the prospective insurer) or where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustees, the members of the Scheme, or others. We do not use

your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.

Your personal data may be processed outside of the European Economic Area ("**EEA**") where required in order for us or Eaton Production International GmBH and/or Eaton Electric Sales Limited to provide benefits to or in respect of you. In each instance, we have ensured or will ensure that the processing of your personal data outside the EEA is protected in the same way as if it was being processed in the EEA by using one of the following safeguards:

- transferring it to a non-EEA country with privacy laws that are recognised by the
  European Commission as giving the same protection as those within the EEA;
- ensuring that the processing of data is governed by the Standard Contractual Clauses approved by the European Commission; or
- for data sent to the USA, transfer it to organisations that are part of the Privacy Shield.
  This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.

We will keep your personal data stored on our systems for as long as it takes us to provide the pension and other benefits provided under the rules of the Scheme. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data.

Data protection legislation gives you the right to access information held about you. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you. Where we or third parties are processing your personal data on the basis that you have consented to that processing then you are entitled to withdraw your consent. If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds. However, some data, for example data in relation to your health or personal life, is regarded as 'special categories of data' and cannot (unless a legal exemption applies) be used without your specific consent at the time. As the administrator of an occupational pension scheme, the Trustees have to process that special category data to perform their obligations under employment law and the law relating to social protection e.g. in relation to the award of benefits on death or ill-health. We understand this will be a valid legal exemption and we will not require your specific consent to process that data. To the extent that is not the case, we will ask for your consent to process 'special categories of data' but you should be aware that without that consent, we may be unable to

administer your pension which may result in you and/or your spouse and dependants not receiving the pension and death benefits provided by the Scheme.

From 25 May 2018, you will be entitled to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller. You can exercise your data protection rights, including your rights to access, restrict, object to the processing of, rectify and erase your personal data by contacting moeller.pensions@aon.com. If you are unhappy with the way in which your personal data is being processed you have a right to lodge a complaint with the Information Commissioner's Office. You can report your concerns by telephoning their helpline on 0303 123 1113 or through their website at https://ico.org.uk/concerns.