Trustees of the Moeller Electric Group Pension Scheme

Privacy Notice

Updated June 2026

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

About us

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, the Trustees of the Scheme, 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. This Privacy Notice sets out the basis on which we collect and use personal information about you as a participating member of the Scheme.

What personal data do we process?

We process the personal data that you provide to us, or that your employer or our administrator provides to us, for the purpose of administering and managing your pension and paying you and/or your spouse and other dependants' benefits. This personal data includes, or may include:

- contact information (such as your name, address, email and telephone number);
- general information (such as your gender, marital and family status, details of dependants and other beneficiaries, date and place of birth);
- your social security or national insurance number, passport number, tax identification number, driver's licence number, entitlement to reside in the UK or other government issued identification number;
- copies of documentation relating to you (for example, birth certificates, marriage certificates, death certificates, pension sharing orders, divorce decrees, insurance underwriting forms, insurance claim forms, passport, utility bills, bank statements, wills, powers of attorney, medical claim forms and copies of documents belonging to spouses, children and dependants);
- medical information (for example your GP, health conditions and medication);
- information provided voluntarily to us (for example, preferences expressed regarding medical treatment based on religious beliefs);
- details of your employment history (for example job title and length of service);
- financial information (for example income, salary, tax and allowances, assets and investments held in other pension arrangements, your bank account number, or other financial account number and account details);
- other information provided by you in the course of communication with us;
- information from external tracing agents, or about criminal records or civil litigation history (for example, for preventing, detecting and investigating fraud); and

- in connection with any request made by you of a pensions dashboard, information, in a pseudonymised form, from a pensions dashboard or from the underlying systems operated by the Money and Pensions Service.

You may also provide us with information which is classified as "special category" personal data, and which requires a higher level of protection. This might include:

- data about your sex life and sexual orientation, in connection with establishing what benefits may be payable under the Scheme on your death or following a divorce or dissolution of a civil partnership; or
- data concerning your current or previous physical, mental or medical condition, health status, injury or disability information, medical diagnosis, medical procedures performed and treatment given, personal habits (for example, smoking or consumption of alcohol), prescription information, and medical history of you and your family.

Why do we process your personal data?

The law requires us to have a lawful basis for collecting and using your personal information. We rely on one or more of the following lawful bases:

- Legal obligation: We use your personal data to comply with our legal obligations as the Trustees of the Scheme. Also, if you request pension information via a pensions dashboard, we are under a legal obligation to process and authenticate your request, and to make your pensions data available to you on that dashboard;
- Legitimate interests: We use your personal data where necessary to do so for the purposes of our legitimate interests in administering the Scheme, notifying you of change to your benefits, providing you with information about your retirement and pensions options, ensuring the security of our network and information systems, processing complaints or defending legal claims, and complying with our obligations to notify HMRC or the Pensions Regulator of certain events;
- Contract performance: We use your personal data where it is necessary to do so in order to fulfil our contractual obligations owed to you, as a member of the Scheme; and
- Consent: We also have your consent to hold certain information such as your bank account details (to allow you to receive your benefits) and your expression of wish form (to assist us in exercising its discretion in making discretionary payments).

Where we use special categories of personal data (such as medical records when we consider ill health applications or for obtaining costs for insuring your benefits with an insurance company) our legal basis for doing so will either be:

- explicit consent;
- because the processing is necessary for the establishment, exercise and defence of legal claims (including legal rights);
- because the processing is necessary for the purpose of making a determination in connection with eligibility for, or benefits payable under the Scheme and the potential beneficiary about whom the data relates is not the member; or
- because the processing is necessary to protect your vital interests or those of another person where you are physically or legally incapable of giving consent.

We may be required to obtain your personal data to comply with our legal requirements or to enable us to fulfil our duties as Trustees of the Scheme. If you do not provide the relevant information to us, we may not be able to meet these requirements and our ability to process your benefits under the Scheme may be impacted.

Is your personal data subject to automated decision-making?

“Automated decision-making” takes place when a decision, is taken, which is based solely on automated processing with no meaningful human involvement, and where that decision is based (entirely or partly) on personal information.

We do not currently undertake any automated decision-making which is based on any of your “special categories” of personal information (such as your health data).

If we undertake any other automated decision-making about you, which produces a legal or similarly significant effect (for instance, the denial of benefits), we shall provide you with information about the decisions we have taken, and we shall enable you to make representations about those decisions, have them reviewed by a human, and to contest them.

To whom do we disclose your personal data?

We may share or transfer your personal 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 share your personal data with government authorities and agencies (such as HMRC, the Department for Work and Pensions, the Pension Ombudsman, the Pension Protection Fund and the Pensions Regulator).

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.

In connection with providing your data to pensions dashboards, we will share encrypted personal information with the Money and Pensions Service, in its role as operator of the IT systems underlying the pensions dashboard programme. We will also share prescribed pensions information with the pensions dashboard provider which you use to request your pensions information. We may also engage service providers and consultants in connection with performing our legal obligations concerning pensions dashboards.

Where will we transfer your personal data?

Your personal data may be processed outside of the UK 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 UK is protected in the same way as if it was being processed in the UK by using one of the following safeguards:

- transferring it to a non-UK country with privacy laws that are recognised by the UK government as giving the same protection as those within the UK; or

- ensuring that the processing of data is governed by the UK government approved standard contractual clauses.

We shall also undertake a transfer risk assessment in relation to the transfer of your personal data outside the UK, where required by law.

Commented [A1]: Trustees should ensure they are aware of any transfers of member data outside the UK, and that all relevant safeguards (as described in this section) have been put in place. This may include risk transfer assessments.

How long will we keep your personal data?

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.

In connection with the pensions dashboard programme, we generate pension identifier codes which link your request (to find or view your pension details) with a pension plan you have with us. These codes can be deleted by you if you delete your account with the relevant pensions dashboard. They will also automatically expire if your dashboard account remains inactive for five years (or other timescale determined by the Money and Pensions Service). We also retain on a long-term basis identifier codes which link multiple requests for the same information made by you via a pensions dashboard.

Our Scheme actuary, administrators and legal advisers may have different retention policies and they may hold your personal information for a shorter or longer period for their own purposes.

What rights do you have in respect of your personal data?

You have certain rights under data protection law with respect to your personal data. The rights only apply in certain circumstances and are subject to certain exemptions. These are summarised as follows below.

- Right of access to your personal data: You have the right to receive a copy of your personal data that we hold about you, subject to certain exemptions.
- Right to rectify your personal data: You have the right to ask us to correct your personal data that we hold where it is incorrect or incomplete.
- Right to erasure of your personal data: You have the right to ask that your personal data be deleted in certain circumstances.
- Right to restrict the use of your personal data: You have the right to suspend our use of your personal data in certain circumstances.
- Right to data portability: You have the right in certain circumstances to obtain your personal data in a structured, commonly used and machine-readable format, and for it to be transferred to another organisation, where it is technically feasible.
- Right to object to the use of your personal data: You have the right to object to the use of your personal data in certain circumstances, including its use for marketing purposes.
- Right to withdraw consent: You have the right to withdraw your consent at any time where we rely on consent to use your personal data.
- Right to complain: You have the right to complain to the Information Commissioner's Office (ICO), where you think that we have not used your personal data in accordance with data protection law. For more details, please visit the ICO website (https://ico.org.uk). You also have the right to complain to us directly, by contacting us on the details set out further below.

Changes to this Privacy Notice

This Privacy Notice may be reviewed at any time and without notice to you. You may request a copy of the current Privacy Notice at any time by using the contact details below.

How to contact us

To contact us for any reason in connection with your personal data or this Privacy Notice, or to make a complaint concerning our processing of your personal data, please contact us by email at moeller.pensions@aon.com.