

Trustees of the Thomson Pension Fund (the “Trustees”)

Thomson Pension Fund (the ‘Scheme’)

Privacy Acknowledgement and Consent

By providing your information to the Trustee, you acknowledge our use of your personal data as set out in our Privacy Policy which can be found on the following page and consent to our use of Special Categories of Personal Data as set out below.

In order to effectively administer your benefits under the Scheme, we are required to collect, process and disclose Special Categories of Personal Data about you which may include health data or data relating to your sexual orientation and/or the gender of your partner which you may provide or have provided to us or we may have obtained or may obtain from other sources to the extent relevant to the administration of your benefits under the Scheme.

For example, we may need to process data about your health in relation to your application for an ill-health benefit and we may record details of your relatives and/or dependants, for example, on an ‘Expression of Wishes’ form so that we can distribute any benefits payable on your death.

Where we cannot rely on another processing ground, you consent to us processing these types of personal data so that we can adequately provide a pensions administration service to you. Where you are providing these types of personal data about a dependant/beneficiary/next-of-kin, you agree that you have provided our Privacy Policy to them and obtained their consent to our collection, processing and disclosure of their Special Categories of Personal Data as set out above.

If at any time you do not want us to process this personal data, you can contact us as indicated at paragraph 5.4 of the Privacy Policy.

You should be aware that in most circumstances we will not be able to provide these services to you and pay benefits to you or your dependants without continuing to process this personal data.

Trustees of the Thomson Pension Fund (the 'Trustees')

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Privacy Policy

1 Privacy Policy

- 1.1 The Trustees ('**we/us/our**') are committed to safeguarding the privacy of our members and your agents and relations ('**you**') to whom we provide our services. We use commercially reasonable physical, electronic and procedural measures to protect your personal information in accordance with data protection legislative requirements. This Privacy Policy sets out our personal information collection and sharing practices of the personal information you provide to us either in person, in writing, through a website, via email or over the telephone.
- 1.2 Further notices highlighting certain uses we wish to make of your personal information together with the ability to opt in or out of selected uses may also be provided to you when we collect personal information from you.
- 1.3 This Privacy Policy is intended to explain our privacy practices and covers the following areas:
- (a) what personal information about you we may collect;
 - (b) how we may use your personal information;
 - (c) who we may disclose your personal information to;
 - (d) how we protect your personal information;
 - (e) contacting us & your rights in relation to your personal information; and
 - (f) how changes to this Privacy Policy will be made.

2 Information we may collect about you

- 2.1 We may collect and process the following personal information about you
- (a) **biographical information you or your employer provides to us:** personal information that you or your employer provides to us, such as in relation to your membership of the Scheme including your name, gender, age, date of birth, address (and/or proof of address), other contact details, national insurance number;
 - (b) **employment information you or your employer provides to us:** your bank account details, details of your employment (including your salary) and details of your family and dependants;
 - (c) **identification information:** information which establishes your identity, such as birth/marriage/death certificates, electoral roll data, utility bills and passports;
 - (d) **our correspondence:** if you contact us, we may keep a record of that correspondence;
 - (e) **benefits details:** details relating to the benefits provided to you under the Scheme, including the date you joined the Scheme, your membership number, earnings, the category and value of your benefits, relevant matters impacting your benefits and information to allow us to assess your entitlement;
 - (f) **website and communication usage:** where you visit our websites, we also collect details of your visits to the websites and information collected through cookies and other tracking

technologies including, but not limited to, your IP address and domain name, your browser version and operation system, traffic data, location data, web logs and other communication data and the resources you access.

- 2.2 Where applicable, we also collect information about your dependants/beneficiaries/next-of-kin, for example by asking you to complete an expression of wishes form. This helps us to identify potential beneficiaries of death benefits. Before providing us with any such information, you should provide a copy of this Privacy Policy to those individuals.

Special Categories of Personal Data

In order to effectively administer your benefits under the Scheme, we are required to collect, process and disclose Special Categories of Personal Data about you which may include health data or data relating to your sexual orientation and/or the gender of your partner which you may provide or have provided to us or we may have obtained or may obtain from other sources to the extent relevant to the administration of your benefits under the Scheme.

For example we may need to process data about your health in relation to your application for an ill-health benefit and we may record details of your relatives and/or dependants, for example, on an 'Expression of Wishes' form so that we can distribute any benefits payable on your death.

Where we cannot rely on another processing ground, you consent to us processing these types of personal data so that we can adequately provide a pensions administration service to you. Where you are providing these types of personal data about a dependant/beneficiary/next-of-kin, you agree that you have provided our Privacy Policy to them and obtained their consent to our collection, processing and disclosure of their Special Categories of Personal Data as set out above.

If at any time you do not want us to process this personal data, you can contact us as indicated at paragraph 5.4 of the Privacy Policy.

You should be aware that in most circumstances we will not be able to provide these services to you and pay benefits to you or your dependants without continuing to process this personal data.

3 Uses made of your personal information

- 3.1 We may use your personal information in the following ways. For each use, we note the legal bases we use to justify each use of your personal information. Further explanation of these legal bases can be found in Appendix 1 to this Policy.

- (a) **Insurers and alternative providers: to provide our services effectively to you, administer your benefits under the scheme and conduct our business:** to administer our services, including to carry out our obligations (including in relation to administering the benefits under the Scheme), to verify your identity and details and to record and pay benefits and to manage the liabilities of the Scheme (e.g. longevity planning, insuring Scheme liabilities with an insurer, Scheme mergers and benefit changes and options). This may include passing your data to third parties such as agents or contractors (e.g. pension secretariats and third party administrators) or to our advisors (e.g. legal, actuarial, covenant, investment or other advisors) and to our insurers and reinsurers.

Legal bases: legitimate interests (to enable us to perform our obligations, manage our business and provide our services to you);

- (b) **actuarial valuations:** in order comply with our actuarial duties, we are required to provide membership data to our actuarial advisers to undertake all of the actuarial work necessary for the Scheme;

Legal bases: legal obligations where required by law;

- (c) **monitoring of Third-Party Administrator(s):** we may use data provided by you to monitor the performance of our Third-Party Administrator(s), such as reviewing feedback from member questionnaires and looking into complaints;

Legal bases: legitimate interests (to ensure the service provided to members is of an acceptable standard);

- (d) **investment advisors:** we are required to provide membership data to our investment advisers to undertake the investment work necessary for the Scheme;

Legal bases: legitimate interests (to ensure the service provided to members is of an acceptable standard);

- (e) **in relation to fraud prevention:** we and other relevant organisations may also access and use certain information to prevent fraud as may be required by applicable law and regulation and best practice at any given time. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them;

Legal bases: legal obligations where required by law. In all other cases, legitimate interests (to ensure that you fall within our acceptable risk profile and to assist with the prevention of crime and fraud). Where this involves the processing of Special Categories of Personal Data, the legal basis we rely on is Public Interest (prevention/detection of crime);

- (f) **to recover debts due:** to recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action (including the commencement and carrying out of legal and court proceedings);

Legal bases: legitimate interests (to ensure that we are paid for our services (where applicable) and to ensure that correct benefits are paid);

- (g) **for research and development purposes:** to analyse it in order to better understand our members' requirements, to better understand our business and develop our services and to improve our processes and our use of technology. This may include de-identifying or aggregating your personal information and undertaking data analytics and machine learning. This may include passing your data to third parties such as agents or contractors and our advisors;

Legal bases: legitimate interests (to allow us to better understand and improve our services);

- (h) **to inform you of changes:** to notify you about changes in respect of the administration of the pension Scheme;

Legal bases: legitimate interests (to notify you about changes to our service);

- (i) **to transfer it to a replacement trustee:** in the event that we are all removed as trustees (for example, if an independent corporate sole trustee were to be appointed), we may need to transfer some or all of your personal information to the relevant replacement trustee or third party (or its advisors) as part of any due diligence process or transferred to that third party;

Legal bases: legitimate interests (in order to allow us to transfer your data to replacement trustees);

- (j) **in connection with legal or regulatory obligations:** we may process your personal information to comply with our regulatory requirements which may include disclosing your personal information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime;

Legal bases: legal obligations where required by law. In all other cases, legitimate interests (to cooperate with law enforcement and regulatory authorities). Where this involves the processing of Special Categories of Personal Data, the legal basis we rely on is public interest (prevention/detection of crime) or legal claims.

4 Transmission, storage and security of your personal information

Security over the internet

- 4.1 While no data transmission (including over the Internet or any website) can be guaranteed to be secure from intrusion, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.
- 4.2 All information you provide to us is stored on our and/or our subcontractors' secure servers and accessed and used subject to our security policies and standards. If we have given you (or where you have chosen) a password which enables you to access certain parts of our and/or our subcontractors websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we or our subcontractors notify you of. We ask you not to share a password with anyone.

Export outside the UK

- 4.3 Your personal information may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the UK in which data protection laws may be of a lower standard than in the UK. Regardless of location or whether the person is an employee or contractor we will impose the same data protection safeguards that we deploy inside the UK.
- 4.4 Certain countries outside the UK have been approved by the UK Secretary of State as providing essentially equivalent protections to UK data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions. In countries which have not had these approvals (see the full list here <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-transfers-a-guide/>), we will either ask for your consent to the transfer or will transfer it subject to contractual terms that impose equivalent data protection obligations directly on the recipient unless we are permitted under applicable data protection law to make such transfers without such formalities.
- 4.5 Please contact us as set out in paragraph 5.4 below if you would like to see a copy of the specific safeguards applied to the export of your personal information.

Storage limits

- 4.6 We will retain your personal information for as long as is necessary for the processing purpose(s) for which they were collected and any other permitted linked purpose (for example we will usually retain personal data up until the later of the death of the beneficiary or dependant (as applicable) plus six years. If information is used for two purposes we will retain it until the purpose with the latest period expires; but we will stop using it for the purpose with a shorter period once that period expires.

We restrict access to your personal information to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs and your information that is no longer needed is either irreversibly anonymised (and the anonymised information may be retained) or securely destroyed.

5 Your rights & contacting us

Your rights

- 5.1 If you have any questions in relation to our use of your personal information, you should first contact us as per paragraph 5.3 below. Under certain conditions, you may have the right to require us to:
- (a) provide you with further details on the use we make of your information;
 - (b) provide you with a copy of information that you have provided to us;
 - (c) transfer certain of your information to you or a third party in a structured, commonly used and machine readable format;
 - (d) update any inaccuracies in the personal information we hold (we will use reasonable endeavours to ensure that your personal information is accurate. In order to assist us with this, you should notify us of any changes to the personal information that you have provided to us by contacting us as set out in paragraph 5.4 below);
 - (e) delete any personal information that we no longer have a lawful ground to use;
 - (f) where processing is based on consent, to withdraw your consent so that we stop that particular processing;
 - (g) object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
 - (h) restrict how we use your information whilst a complaint is being investigated.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights we will check your entitlement and respond in most cases within a month.

- 5.2 If you are not satisfied with our use of your personal information or our response to any exercise of these rights you have the right to complain to the Information Commissioner's Office (ICO). The ICO can be contacted at:

Information Commissioner's Office (Head Office)
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113

Contacting us

- 5.3 The "data controller" of your personal information processed by us under this Privacy Policy is the Trustees. We also share personal data with the Actuary to the Scheme. The Actuary (who is employed by Aon) to the Scheme is also a data controller when using personal information held

in respect of you for the purposes of assessing, with the Trustees, financial matters affecting the Scheme. We have included Aon's quick read privacy notice in Appendix 2.

- 5.4 If you have any questions in relation to this policy, please contact our Scheme Secretary (Thomson Pension Fund) c/o Aon, Briarcliff House, Kingsmead, Farnborough, GU14 7TE or email thomson.pension@aon.com

6 Changes to our Privacy Policy

- 6.1 Our Privacy Policy may change from time to time in the future. If we change the uses of your information collected offline, we will provide an update to this Privacy Policy to you.
- 6.2 This Privacy Policy was last updated in February 2024.
- 6.3 Further notices highlighting particular uses we wish to make of your personal information together with the ability to opt in or out may also be provided to you when we collect certain personal information from you.

Appendix 1

Details of legal bases used to justify the processing of your personal information

These are the principal legal grounds that justify our use of your information as referred to in the section 3 of the privacy policy titled “Uses made of your personal information”:

Consent: where you have consented to our use of your information (you will have been presented with a consent form in relation to any such use).

Legal obligation: where we need to use your information to comply with our legal obligations.
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Legitimate interests: where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.

Consent: where you have consented to our use of your information (you will have been presented with a consent form in relation to any such use).

These are the principal legal grounds that justify our use of your Special Categories of Personal Data as referred to in the section 3 of the privacy policy titled “Uses made of your personal information”:

Legal claims: where your information is necessary for us to establish, defend, prosecute or make a claim against you, us or a third party.

Public Interest: Processing is necessary for reasons of substantial public interest, on the basis of UK law.

Explicit consent: You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent by contacting us in accordance with Section 5.4 of the privacy policy. If you do so, we may be unable to provide a benefit or service that requires the use of such data.
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Aon Solutions UK Limited "SHORT FORM" PRIVACY NOTICE

Aon Solutions UK Limited (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 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 we 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.

We 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 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 information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at <http://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>, or you can request a copy by contacting contact us, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH.