

## Townsend Hook Defined Contribution Plan (the "Scheme") Personal information and what we do with it

Smurfit Westrock Staff Trustees Limited (the "**Trustee**") acting as trustee of the Scheme needs personal information about you to run the Scheme and pay benefits.

In this notice, we set out information about what the Trustee does with your personal information. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the use we make of your information.

The Appendix to this notice sets out a brief description from our pension provider, Aon Solutions UK Limited ("**Aon**"), on how it uses your personal data in order to support the Trustee in the running of the Scheme.

### What personal information we have

We normally hold some or all of the following types of personal information:

- Your name, date of birth, national insurance number and bank account information (where benefits are in payment).
- Your sex/gender (we use sex to understand how long you are likely to receive your pension for and gender as part of your addressee details if we write to you e.g. 'Mr., Mrs., Ms.')
- Contact details (including your address, phone number and email address).
- If your benefits from the Scheme derive from your employment, details of your employer when you were building up benefits in the Scheme, 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 benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Scheme.
- 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 pension.
- Correspondence that we may have received about you from your appointed independent financial adviser.

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 Scheme, or details about personal relationships to determine who should receive benefits on your death. We may have information about gender reassignment, if you have a gender recognition certificate or have told us that you identify with a different gender from your birth sex. We may also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

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.

### Where we get personal information from

Some of the information the Trustee has comes directly from you. In addition, Aon, who administers the Scheme on behalf of the Trustee (the "**Scheme administrator**"), may have obtained information from you and passed it to the Trustee.

The Trustee may then in turn pass information about you to other advisers of the Scheme or may instruct the administrator to do so.

Sometimes the Trustee gets information from other sources, for example:

- from your Scheme employer (for information such as your salary and length of service);
- from another scheme if you have transferred benefits from that scheme;
- from government departments such as HMRC and the DWP;
- any AVC providers of the Scheme who hold benefits for you;
- previous administrators of the Scheme; and
- from tracking and tracing services or from publicly accessible sources (e.g. the electoral roll) if the Trustee has lost touch with you and is trying to find you.

The Trustee may in turn pass this information to other advisers of the Scheme.

If the Trustee asks you for other information in the future (for example, about your health), it will explain whether you have a choice about providing it and the consequences for you if you do not do so.

### **Why we hold personal information and how we share it**

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

The Trustee will use your personal information to comply with these legal obligations, to establish and defend its legal rights, and to prevent and detect crimes such as fraud. The Trustee may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

The Trustee also has a legitimate interest in properly administering the Scheme. This includes:

- paying benefits as they fall due;
- purchasing insurance contracts;
- communicating with you; and
- ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in the Pensions Regulator's guidance).

The Trustee makes sure that your own interests are not outweighed or prejudiced by the Scheme's legitimate interests.

In order to achieve this, the Trustee may share your personal information with various people as necessary, including:

- any new trustees or trustee directors;
- the Scheme employer;
- the Scheme administrator;
- the Scheme actuary;
- any AVC provider;
- insurers;
- appointed independent financial advisers;
- the Trustee's other professional advisers which includes its legal advisers, investment advisers and auditors;
- HMRC;
- the Pensions Ombudsman;
- the Pensions Regulator;
- the Information Commissioner;
- IT and data storage providers; and
- other service providers such as printers who help the Trustee prepare communications which the Trustee send to members, and tracking and tracing services.

A list of the Trustee's professional advisers and the other parties involved with the Scheme are detailed in the Scheme's annual report and accounts, a copy of which can be provided upon request.

If your benefits are transferred to another scheme, the Trustee will also need to provide the administrators of that scheme with information about you.

When the Trustee needs to use information about your health in the context of ill health early retirement (for example), it may ask for your consent. However, sometimes there may be reasons of public interest or law which enables the Trustee to use information about your health when there's a different context than early retirement – e.g. when you are unwell and someone else is looking after your affairs for you. Equally, this point applies to other very personal information, such as details about the personal relationships relevant to who should receive benefits on your death or information on gender reassignment. This data can be used by the Trustee without consent where that is necessary to run the Scheme in a sensible way. If your consent is required, you can withdraw your consent at any time by contacting the Trustee using the contact details given below. This may affect what the Trustee can do for you, unless it has another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to the Trustee processing your health data for that, but then you withdraw that consent, the Trustee 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, the Trustee need to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims.

The Trustee 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 Scheme.

The Scheme's employer may also have a legitimate interest in contacting you about your benefits under the Scheme, 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.

The Trustee 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 anonymised data). Insurers will use that data to verify the assets and liabilities of the Scheme. The Trustee may write to you before purchasing an annuity to ask for up to date information about your spouse/partner/children/other dependants to this end.

The Trustee 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. The following categories of personal data would typically be shared with insurers: Scheme 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.

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

Some of the people mentioned 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 provide their services, perform their functions, or comply with their regulatory requirements. In such a case, they have responsibilities as data controllers in their own right. This means that they are subject to the same legal obligations as the Trustee in relation to your information, and the rights you have in relation to your information apply to them, too.

If you want any more information from any other people who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact the Trustee and it will put you in touch with them.

### **How long we keep your personal information for**

We need to keep your personal information for long enough to make sure that we have enough information to:

- pay any benefits due to or in respect of you;
- answer any queries you (or others acting on your behalf) may have about your benefits;
- respond to any complaints or other claims; and
- satisfy our legal obligations in relation to the Scheme.

To meet this aim, the personal information that we hold will be kept for how long we sensibly think we need it to deal with queries from you or your beneficiaries/other persons who might ask us if they are entitled to payments, complaints (from you or them) and our legal obligations mentioned above.

### 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; and
- 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.

**To exercise these rights, please use the Trustee's Scheme administrator's contact details, which are set out below. The Trustee's Scheme administrator can also supply more information about these rights to you, on request.**

### Keeping your information safe

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.

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, please contact the Trustee via the Scheme administrator at:

**Telephone number:** 0333 207 9359 (+44 333 207 9359 from overseas)

**Email:** [townsendhook.pensions@aon.com](mailto:townsendhook.pensions@aon.com)

**Postal address:** Smurfit Kappa UK Pension Fund Aon Scanning Division, PO Box 196, Huddersfield, HD8 1EG

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

## Appendix

### Aon Solutions UK Limited "QUICK READ" 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 <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>, or you can request a copy by contacting 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