

TRIVIUM PACKAGING UK 2020 PENSION SCHEME ("SCHEME") MEMBER PRIVACY NOTICE

1. Introduction

- 1.1 As the party with legal responsibility for the Scheme, the Scheme's trustee, Trivium UK Pension Trustee Limited ("**the Trustee**") is required to respect and protect members' privacy. This privacy notice ("**Notice**") sets out the basis on which the Trustee processes the personal data we collect from you as a 'controller' of your data. We need to have this information to allow us to ensure that the correct contributions are paid and that benefits are correctly calculated, paid at the right time and to the right person and, at the requisite time, to match certain members with their pensions and to send information about their pensions to Pensions Dashboards.
- 1.2 This Notice applies to all Scheme members and any third parties whose information you provide to us (ie, details of relatives or beneficiaries).
- 1.3 We may update or amend this Notice (and will notify you of any material amendments).

2. Types of Personal Data Processed

- 2.1 "Personal data" is a concept defined by data protection laws, and refers to information which relates to an identified (or identifiable) individual.
- 2.2 The types of personal data which we process will vary depending on the specific circumstances relevant to you. Typically, this will include:
- 2.2.1 **Your Personal Details** - including, your name, date of birth, gender, personal contact details;
 - 2.2.2 **Remuneration Data** - including, pay, bank account details, social security or national insurance number and some tax information; and
 - 2.2.3 **Incapacity Data** - including, personal data relating to ill health, relevant to the Scheme.
 - 2.2.4 Electronic "pension identifiers" for pensions dashboards

3. Legal Basis and Purposes for Processing Data

- 3.1 We use your personal data for many aspects of managing the Scheme.
- 3.2 Whenever we process your personal data, we do so on the basis of a lawful "condition" for processing. Processing of "special categories of personal data" (including, data relating to health, sexual life, racial or ethnic origin or religious beliefs) must also be justified.
- 3.3 The processing of your personal data will usually be justified to give effect to a contractual right, to allow us to comply with a legal obligation, or because it is in our legitimate interests or the legitimate interests of other parties (such as the Scheme employers e.g. for strategic planning purposes or insurers who are recipients of data in a buy-in/buy-out scenario) as managers and administrators of the Scheme to do so.
- 3.4 Processing special categories of personal data is usually justified for the purposes of making a determination under the Scheme, you have provided your explicit consent, or for the establishment, exercise or defence of legal claims. Where we rely on consent we will ensure we obtain it in compliance with the UK data protection legislation and ensure you are told you can withdraw consent.
- 3.5 The processing of data revealing criminal convictions will only be carried out where there is a legal authorisation to do so under either EU or local law.

4. Retention of Personal Data

Our general approach is to only retain member personal data for as long as is required to satisfy the purpose for which it was collected by us or provided by you.

5. Profiling and Automated Decision Making

We confirm the Scheme does not use 'automated decision making' or 'automated processing' of your personal data (often referred to as "profiling").

6. Sources of Personal Data

- 6.1 Your personal data will usually have been provided by you or by third parties (such as the Scheme's employers, other scheme administrators or regulatory bodies). This information may also be provided to us indirectly through the Pensions Dashboards Ecosystem, including the identity service, the pension finder service and the consent and authorisation service.
- 6.2 Where we obtain personal data from the Dashboards Ecosystem or during the process of matching members with their Scheme benefits for dashboards purposes, we may retain that data to help demonstrate how and why we concluded that the person is (or is not) a member entitled to receive information about their benefits on dashboards, and to help us administer the Scheme.

7. Disclosures of Personal Data

- 7.1 We may share your personal data with others, for example, with third party administrators and professional advisers appointed by the Trustee.
- 7.2 Your personal data may also be disclosed to advisors, potential transaction partners or interested third parties in connection with a corporate transaction or restructuring of the Company.
- 7.3 Details of those with whom we will share your data and why is set out in our Data Record. Copies of this are available on request from the Scheme Secretary whose contact details can be found at paragraph 12 below.
- 7.4 The UK 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 active, deferred and pension credit members who search on dashboards with their pensions under the Scheme. We must also provide pensions information to the Dashboards Ecosystem so that it can be displayed when a Member (or a delegate authorised by the Member) asks to see it on a dashboard.
- 7.5 These activities may involve sharing member data with entities within the Dashboards Ecosystem (including the identity service, the pension finder service, the consent and authorisation service), non-commercial dashboards and commercial dashboards]] and with provider(s)/the Integrated Service Providers/administrator we appoint to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboards duties.
- 7.6 As part of these dashboards duties, we may also need to report information (which could potentially include personal data) to bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.
- 7.7 We are aware that we are expected to follow the statutory code of practice issued by the ICO when sharing personal data.

8. Cross-border Transfers

- 8.1 The global nature of some of our third party service providers means that your personal data may be disclosed outside of the UK.
- 8.2 Where we are asked to allow data to be transferred outside of the UK, e.g. where the administrators wish to carry out their services using an office outside the UK, we will ask for information about the safeguards that the recipient of the data will apply to any personal data that is transferred and ensure that an appropriate mechanism is in place to protect the personal data during and after the transfer. We will not transfer personal data until appropriate checks have been made.
- 8.3 Whenever we (or the administrators) engage new data processors, we will carry out due diligence to find out whether their operations involves a transfer of member data outside the UK and if so, using what mechanism transfers are based. We will not provide the new processors with any personal data until we have received confirmation that satisfactory data transfer mechanisms are in place.

- 8.4 We will keep a list of all restricted transfers (and mechanisms used for them) in our Data Record.
- 8.5 We will ensure that the administrator has processes in place to consider data protection whenever you request an overseas transfer.
- 8.6 Where third parties transfer your personal data outside of the UK, we will take steps to ensure that your personal data receives an adequate level of protection.
- 8.7 You have a right to request a copy of any data transfer agreement under which we transfer your personal data, or to otherwise have access to the safeguards which we use.

9. Security of your Personal Data

As Trustee, we implement reasonable physical, technical and administrative security measures designed to protect your personal data.

10. Data Subject Rights

- 10.1 You have the following rights in respect of your personal data:
 - 10.1.1 to obtain access to your personal data together with information about how and on what basis that personal data is processed;
 - 10.1.2 to rectify inaccurate personal data (including the right to have incomplete personal data completed);
 - 10.1.3 to erase your personal data in limited circumstances;
 - 10.1.4 to restrict processing of your personal data where:
 - 10.1.4.1 the accuracy of the personal data is contested;
 - 10.1.4.2 the processing is unlawful but you object to the erasure of the personal data; and
 - 10.1.4.3 we no longer require the personal data for the purposes for which it was collected, but it is required for the establishment, exercise or defense of a legal claim;
 - 10.1.5 to challenge processing which we have justified on the basis of a legitimate interest;
 - 10.1.6 to data portability where processing is automated and based on consent or performance of a contract (you have the right to your personal data in a structured machine readable format, and the right to have it transmitted to another data controller);
 - 10.1.7 to know where the information we hold comes from, but only where we have not collected it from you;
 - 10.1.8 to complain to the Information Commissioner or to the Trustee as data controller;
 - 10.1.9 to object to automated decision making; or
 - 10.1.10 to obtain a copy of, or access to, safeguards under which your personal data is transferred outside of the EEA (see paragraph 8.7).
- 10.2 In addition to the above, you have the right to lodge a complaint with the Information Commissioner's Office.

11. Review

- 11.1 The law requires that we only hold the information we need to run the Scheme properly and we only use it for the purposes set out in Section 3 above. In our view, all of the information set out above is necessary for these purposes.
- 11.2 We will review the information that we hold every three years to ensure that it remains necessary for the purposes set out in Section 3.
- 11.3 We only collect information that we need to comply with our obligations in relation to the Scheme. We will keep data minimisation in mind when asking for information.

12. Contact

If you wish to investigate the exercising of any of the rights referred to in paragraph 10 in relation to the Scheme, please contact the Secretary to the Trustee, Mr J Craven at: Aon, 3 The Embankment, Sovereign Street, Leeds, LS1 4BJ in the first instance.

Right to complain

If you believe your personal data has not been handled in accordance with applicable data protection laws, you have the right to complain directly to us. Your complaint will be acknowledged within 30 days and investigated and responded to without undue delay.

To exercise this right please contact the Scheme Secretary at the following address: Mr J Craven at: Aon, 3 The Embankment, Sovereign Street, Leeds, LS1 4BJ in the first instance

If you are not satisfied with the outcome, you have the right to complain to the regulator. Further details can be found on the ICO's [complaints page](#)

Appendix (1)

Aon Solutions UK Limited “SHORT FORM” PRIVACY NOTICE

Aon Solutions UK Limited (and 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 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.

Capital Cranfield

Giles Payne of Capital Cranfield Pension Trustees Limited is a professional Trustee appointed to the board of Trivium UK Pension Trustee Limited. Capital Cranfield Pension Trustees Limited is also a Data Controller and will continue to be so should its appointment as Trustee come to an end. This is so that it can continue to assist with member and beneficiary queries and complaints.

Capital Cranfield's own privacy notice can be accessed through the following link from 25 May 2018:

<http://capitalcranfield.com/wp-content/uploads/2018/04/PRIVACY-NOTICE.pdf>

Alternatively, please contact the Trustee using the contact details in section 11 and we will obtain a hard copy of these documents for you.

It is possible that other providers used by the Trustee may, after this document has been issued, also wish us to direct you to their own privacy notice. If this happens we will do this in our next routine communication. However, you can contact us at any time using the address at section 11 to confirm the current position.