

General Privacy Notice – Valero UK Pension Plan

Who we are

We are the Trustees of the Valero UK Pension Plan (the “Plan”).

As the Trustees of the Plan, we hold certain personal information (known as “personal data”) about Plan members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustees in running the Plan will be personal data (in other words, because we hold information from which you as an individual can be identified, any information we hold in respect of you will be subject to certain protections).

For legal purposes, the Trustees are known as the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name, date of birth, gender, contact details (ie address, home and mobile phone numbers, email address) and national insurance number;
- employment details such as your employment history (including any breaks in service or where service has been transferred in), pensionable service records, salary information, contribution records;
- financial details such as details of your bank account (to pay benefits) and tax information;
- details about your family and personal circumstances, such as your marital status, details of your spouse/civil partner, dependants and other family members;
- information about your benefits under the Plan, including pensions and death benefits, together with corresponding details of assets and investments (where applicable);
- online information such as cookies and IP address (your computer’s internet address) if you use our website Valero UK Pension Plan Website

We may also hold ‘special categories’ of personal data (ie sensitive information which comes with additional safeguards under data protection legislation). This may include information about your health, including any medical conditions (for example, if you apply for ill-health early retirement).

How we collect the information

We may collect this information from:

- you (for example when you fill in a pension form, when you contact the Plan with a query or complaint);

- your employer;
- another pension arrangement (if you have transferred benefits into the Plan);
- an existing member of the Plan;
- persons acting on your behalf;
- service providers who help us trace members with whom we have lost contact;
- from a public body such as HMRC;
- from our advisers; and
- from other third parties including, for example, your next of kin or anyone else entitled to benefit from your membership of the Plan.

How we use that information

We will typically use this information for the following purposes:

- to contact you;
- to respond to individual queries, complaints and disputes;
- to calculate, provide and assess eligibility for Plan benefits;
- to comply with obligations arising from administering the Plan;
- to determine and implement alternative ways of providing Plan benefits;
- to determine and manage Plan investments and risks;
- to determine and manage Plan liabilities and funding requirements;

Reasons we can collect and use your personal information

The lawful basis on which we collect and use your personal data will usually be one or more of the following:

- to comply with a legal obligation (eg our obligations to you as trustees to administer the Plan so that you can receive the benefits you are entitled to and make transfers to other schemes);
- for the performance of a contract with you, or to take steps to enter into a contract;
- for the purposes of our legitimate interests in running the Plan properly or those of a third party (eg your employer), but only if these are not overridden by your interests, rights or freedoms. We may also use your personal data to pursue our legitimate interests concerning the potential future development of the Plan.

Where we hold 'special categories' of personal data, we will explain to you at the time why we need it and how the information will be used. We will only process special categories of personal data where we need to do so to establish a right to a benefit. In any other circumstances where we need to process special categories of personal data we will seek your prior consent.

Where we are carrying out processing on the basis of your consent, you have the right to withdraw that consent at any time by contacting us on the details provided. Any withdrawal of consent will not impact on the lawfulness of the processing which took place prior to the withdrawal.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to the information we collect or to the purposes for which we collect and process it.

Who we share it with

As the Trustees need help from various advisers to properly administer the Plan, we share personal data with the following:

- the third parties who are responsible for the day-to-day administration of the Plan on behalf of the Trustees including companies which host the website and run our administration systems
- your current, past or future employer at Valero and other companies in the Valero group
- the Plan's professional advisers, including the Plan actuary, auditor, medical advisers, investment adviser and lawyers
- the Plan's pensions manager
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustees can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) in the UK and/or a payment when pensions are being paid overseas
- tracing agencies and consultants who assist the Trustees with updating Plan data or providing statistical information from time to time.

The Plan's actuary and auditor are also data controllers in relation to your personal data. This means that they have to comply with the requirements of data protection legislation, as well as relevant industry codes and standards, when processing your personal data. For more information about what personal data they hold about you and how they use it, please contact the Pensions Trustees (UKPensionplan@valero.com). Or view Aon's Privacy Notice: [Aon Solutions UK Limited Privacy Notice](#)

Transfer of your information out of the UK or EEA

We may share your personal data within the Valero Group. This will involve transferring your data outside the UK or EEA.

Many of our external third parties are based outside the UK or EEA so their processing of your personal data will involve a transfer of data outside the UK or EEA.

Whenever we transfer your personal data out of the UK or EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK or EEA which give personal data the same protection it has in the UK or EEA.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA.

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Plan, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustees may be required to keep some of your personal information for the rest of your life and for 10 years after that so we can pay benefits and answer queries about your benefits.

We review the personal data held in relation to the Plan on a regular basis in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

Your rights

- You have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format.
- If at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected.
- You can require the Trustees to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.
- Where we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustees can override this objection in certain circumstances.

- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustees to continue processing your personal data where this is justified.
- You can request that your personal data is deleted altogether, although the Trustees can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Plan, and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustees can charge a reasonable fee in certain circumstances.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine trust-related need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Who to contact about your personal data

Valero’s Pension Plan has a Data Protection Responsible Person who you should contact in the first instance at (UKPensionplan@valero.com) if you have any questions about this notice or about how we process your personal data, or if you wish to submit a complaint. It may be necessary to seek the assistance of Valero’s Privacy Lead to deal with your enquiry, request or complaint.

Valero’s general contact details are Valero Energy Ltd, Registered Office: 27th Floor, 1 Canada Square, Canary Wharf, London, E14 5AA, England.

Making a data protection complaint

If you would like to make a complaint about our processing of your personal data you have the right to lodge a complaint. Under the Data (Use and Access) Act 2025, you are required to raise any data protection complaint directly with us in the first instance before escalating the matter to the UK Information Commissioner’s Office (ICO). For further information, please see the Trustees’ data protection complaints policy.

Data protection complaints may be submitted by emailing: UKPensionplan@valero.com

Or

By post:

FAO: Valero UK Pension Plan
Valero Energy Ltd.
27th Floor
1 Canada Square
Canary Wharf
London
E14 5AA

If you remain dissatisfied after receiving our final response, you may contact the Information Commissioner's Office (ICO)

Website: <https://www.ico.org.uk>

Telephone: 0303 123 1113

Updates to this notice

This notice is the latest version as at 1 June 2026. This notice will be updated from time to time and you can see the current version at any time by requesting this from ukpensionplan@valero.com. Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see "Who to contact" above).