

PRIVACY NOTICE FOR THE BROADBENT (1983) PENSION PLAN

(the “Scheme”)

The Trustee of the Scheme, currently PAN Trustees UK LLP, (referred to as “we” or “us” in this notice) holds and processes personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we comply with relevant data protection legislation.

What we do with your data

As a data controller, the Trustee collects and processes your personal data for the purposes of complying with its legal duties to administer the Scheme, and for other legitimate purposes relating to the operation of the Scheme such as funding and paying benefits.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by the employer, other schemes from which members have transferred, HMRC, the DWP and regulatory bodies and by tracing organisations. We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member's death. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals as to do so is likely to seriously impair our ability to properly pay the benefits due under the scheme. The data we hold is to assist the trustees to calculate and pay the benefits the members are entitled to, and this includes your name, address, salary, years of service with the scheme, date of birth, NI number and contact details.

We also hold some special category or “sensitive” data about individuals for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We will in most circumstances process this data as necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). If there are any occasions where we seek your explicit consent to process sensitive data then you can withdraw it at any time.

Who else processes your data?

We share your personal data with certain third parties involved in running the Scheme, for example, the Scheme Administrator, currently Capita Pension Solutions Limited (“**Capita**”), , , the Scheme Actuary, currently David Hill FIA, the Scheme's legal advisers, currently CMS Cameron McKenna Nabarro Olswang LLP and Womble Bond Dickinson LLP, and Thomas Broadbent & Sons Limited (the “**Company**”).

In some circumstances we are joint controllers with the Scheme Actuary Scheme Administrator, Scheme legal advisers (who will process personal data to comply with their professional duties as advisers to the Trustee) and the Company.

The Company holds personal data to comply with its legal obligations as the sponsoring employer of the Scheme. It has a legitimate interest in the Scheme being run in a cost-effective way and may have an interest in offering certain options to members. The Trustee will share information with the Company and its auditors and advisers for this purpose.

Scheme advisers may from time-to-time transfer data to other countries, including outside the European Economic Area. Where such transfers are made, the parties involved will ensure adequate safeguards are in place.

Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to retain information relating to you until your membership of the Scheme ends.

Once your membership ends, we may decide to delete some of the data held in relation to you after 6 years. However, information will be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

Please note, PAN Trustees UK LLP may continue to hold personal data collected through its role as a Trustee even when it is no longer a Trustee of the Scheme. Information about PAN Trustees UK LLP's approach in this situation to data security as a firm can be found at <https://www.pantrustees.co.uk/Scheme-GDPR/>

Your rights

You have the right to access your personal data and require that we rectify any errors in the data that we hold or request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

Contact details

If you have any questions about this notice or the information contained in it, please contact the Trustee via email or by post, using the following contact details:

Email: gmasson@broadbent.co.uk

Post: **The Trustee of the Broadbent (1983) Pension Plan**
c/o Thomas Broadbent & Sons Limited
Queen Street South
Huddersfield, West Yorkshire
HD1 3EA

What if you have a complaint?

To make a complaint about how we've handled your information, contact us as set out above.

If you're not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113 or 01625 545 70