

WARBURTONS PENSIONS AND LIFE ASSURANCE PLAN ("Plan")

DATA PROTECTION AND PRIVACY POLICY

The Plan trustees ("Trustees") are committed to keeping your personal information secure. We set out below further details of our data protection and privacy policy.

PRIVACY POLICY

1. Where we obtain your information

In the course of administering your pension, we may hold information about you which is provided by you, your employer or former employer, other pension schemes or professional advisers or HMRC.

2. Categories of information

The information we hold includes your name, address, email address, phone number, date of birth, gender, NI number, salary details, bank details, employment history, periods of Plan membership, benefit entitlement and possibly details of other pension arrangements that you have e.g. in relation to transfers in and out of the Plan. We may also hold information about your spouse, dependants or other potential beneficiaries, and we may hold sensitive personal information e.g. health information, race, religion or sexual orientation, or biometric data (in connection with fraud prevention and verification checks).

3. How we use your information

Your information will be used to administer your pension benefits and for related activities which are consistent with the Trustees' legal obligations under the Plan, or which are in the legitimate interests of the Trustees or a third party. In particular, we will use the information to:

- calculate your benefits, including online calculations that you request;
- identify what benefits are, or might be, payable to you or, in the event of your death, any beneficiaries;
- deal with any queries or disputes you may have about your benefits;
- communicate with you by electronic means, including online, by post or by other means to keep you updated on matters related to the Plan;
- provide you with information about your benefits and options available to you;
- we have a legal obligation to provide you with access to the pensions dashboard which requires sharing data with pensions dashboard providers. For more information on the pensions dashboard see here: [Homepage | UK Pensions Dashboards Programme](#); and
- verify your identity, to prevent and detect fraud and to comply with our legal and regulatory obligations.

4. Why we use your information

The law requires that the Trustees only use your personal data for defined lawful purposes.

We will only use your data where:

- it is necessary to comply with our legal obligations as Trustees, e.g. to pay your benefits as they fall due;
- it is in the legitimate interests of the Trustees or another party to use your data in that way, and in doing so we are not breaching your rights, e.g. if we need to let you know about benefit options or changes to the Plan; or
- you give us your consent to process personal data for a specific purpose, such as if you want us to transfer your personal data to another pensions provider or if you request a specific statement or other pensions related calculations.

We will only process sensitive data, such as health information or biometric data, with your consent or as required for the purposes of carrying out obligations in the field of employment. You have the right to withdraw consent at any time but please note that failure to provide consent, or withdrawal of the consent, could affect our ability to assess your entitlement to certain benefits, e.g. without access to your medical information, the Trustees could not process a claim for ill-health early retirement.

Where we seek to rely on your consent in order to process your sensitive personal data, we will provide further information to you at the point at which we ask for your consent which clearly describes the purposes for which your information will be used, and the consequences of your decision not to provide (or give but then subsequently withdraw) your consent.

5. Sharing your information

We may share your information with:

- any of your employers or former employers who participate in the Plan;
- our professional advisers (including legal advisers, medical advisers and auditors);
- the third party administrator appointed by the Trustees to provide day to day administration services, our current administration services are provided by Hymans Robertson and FIL Life Insurance Limited;
- the Plan actuary;
- the pensions dashboard providers;
- providers of platforms to allow you to access your pensions information;
- entities which provide guidance and advisory services on investments;
- other persons to whom you have authorised data to be disclosed (for example, the pension scheme receiving a transfer value, or an independent financial adviser); and
- other organisations providing services to the Trustees, including pensions governance and communications providers, healthcare practitioners, insurers and pensions tracing services, but in each case only in relation to matters connected to the administration of the Plan and your benefits under it.

We may also share your information with government agencies and other authorities (including HMRC and the Pensions Regulator) where necessary for the proper administration of your benefits, the prevention of crime or to meet legal and regulatory requirements.

Parties that process data that is shared with them will generally be 'data processors'. Parties that decide how your data is to be processed are 'data controllers'.

6. Processing your information outside the United Kingdom and the European Economic Area (EEA)

The United Kingdom and all countries within the EEA have similar standards for the protection of personal data. Where any of your information is transferred to a location outside of the United Kingdom and the EEA (e.g. because any of our advisers or service providers have IT systems located in other jurisdictions) we ensure that there are appropriate safeguards in place to ensure the security of personal data.

Please see the 'Contact us' section below if you would like further information about these safeguards.

7. Security of your information

The Trustees are committed to ensuring that your personal information is secure. We have in place appropriate technical and contractual measures to ensure that information is only shared for the reasons, and by the means, set out in this notice.

The Trustees take great care to ensure that your information is kept secure when we need to share this with a third party as outlined above.

8. How long do we keep your information?

Pension schemes are long-term. We will of course keep your personal information for as long as you are a member of the Plan. We will also retain the information for the longer of period required in order to meet our legal or regulatory responsibilities and a period of at least six years after you leave the Plan for any reason, e.g. following a transfer out, to enable us to deal with any queries that may arise after you have left. We may then destroy such files without further notice or liability to you. Monitoring and recording

We may monitor, record, store and use any telephone, email or other communication with you in order to maintain a record of any instructions given to us, for training purposes, for crime prevention and to improve the quality of service to Plan members.

9. Access to your information and your legal rights

By law you are entitled to the following rights in relation to your personal data (though note that they are not all absolute and there are exceptions to which we can refuse your request):

- obtain a copy of what personal information we hold about you, the purpose for which we hold it and the identity of any person to whom it has been disclosed;
 - ask us to correct any errors in your data, object to or, restrict our use / process of your personal information;
 - ask for your data to be deleted;
 - ask for the processing of your data to be restricted (in certain circumstances);
 - ask us to provide your personal information to you or a third party in a structured commonly used machine-readable format;
 - withdraw your consent to the processing at any time, noting that this does not affect the validity of the processing before the revocation request was received,
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(collectively "your rights").

We may ask you for additional information to confirm your identity and for security purposes, before responding to a request you raise. You are not required to pay any charge for exercising your rights, however, we reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. We have one month to respond to you (unless you have made a number of requests or your request is complex, in which case we may take up to an extra two months to respond). Please see the 'Contact us' section if you would like more information. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

10. Contact us

The Plan's board of Trustees is a 'data controller', i.e. we determine the purposes for which your personal data are processed, and how they are processed.

If you would like any further information about the Trustees' approach to data protection and privacy, or to request details about the information we hold, please contact:

Graeme Mearns
Head of Reward & Pensions
graeme.mearns@warburtons.co.uk

11. Any complaints

If you are unhappy with the way in which your personal data is being processed you have the right to make a data protection complaint directly to us. Complaints can be made by contacting us at the address noted above.

When we receive a data protection complaint, we will:

- Acknowledge receipt of the complaint within 30 days of receiving the complaint;
- Take appropriate steps to investigate the complaint and keep you appropriately informed as the investigation process progresses without undue delay; and
- Inform you of the outcome of your complaint without undue delay.

If you remain dissatisfied with our response or outcome, you can also contact the Information Commissioner. The Information Commissioner is the UK's independent authority set up to uphold information rights and data privacy for individuals. You have the right to lodge a complaint with the Information Commissioner if you are dissatisfied with any aspect of the way that we collect and use your personal information.

The Information Commissioner's website can be found at www.ico.org.uk or you can call their helpline on 0303 123 1113.

12. Updates and changes

We will keep this privacy policy under review and may update it from time to time without prior notice.

13. Other data controllers

Other parties, such as the Trustees' legal advisers, the Plan actuary and auditor, may be data controllers in relation to your data, although the Trustees will be your point of contact. Those parties are required to have their own separate privacy notice, which you can access through the following links:

DLA Piper (Trustees' legal advisers): <https://www.dlapiper.com/en/uk/privacy-policy/>

Hymans Robertson (Plan actuary and administrator): <https://www.hymans.co.uk/schememember-privacy-notice>

Fidelity (administration and advisory services)
<https://www.fidelity.co.uk/privacy-policy/>

Grant Thornton <https://www.grantthornton.co.uk/privacy/>

July 2026