

Humberclyde Finance Group Pension and Life Assurance Scheme

The Trustee of the Humberclyde Finance Group Pension and Life Assurance Scheme is committed to protecting your information and acting in accordance with your rights under data protection law.

This privacy notice contains information on what personal information about you the Scheme collects, what we do with this information, the lawful basis on which personal information is processed and what rights you have.

Collection of your information

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address (including postcode), telephone number, e-mail address, national insurance number, bank account details (in some cases), marital status, dependants and country of residence;
- information relating to your benefits, such as your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings and pensionable earnings, the category and value of contributions and benefits that you have built up or receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- records of communications with you (including any complaints); and
- in some cases, special categories of personal data such your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Where applicable, we also collect information about your dependants, next of kin and any other nominated beneficiaries. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals. We assume that you have the authority to share any personal information you provide to us about them.

In some cases, we will collect personal information about you indirectly from the BNP Paribas entity which is (or was) your employer and from our service providers (e.g. the Scheme administrator, which currently is Barnett Waddingham).

How we use your information

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other schemes;
- b) for general administration of the Scheme, such as: to record and pay benefits; for actuarial valuations and calculations; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you and to prevent fraud;
- c) for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime;
- d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme; and
- e) when we undertake activities from time to time to help us manage the liabilities of the Scheme, such as obtaining life insurance, longevity hedging, insuring Scheme liabilities with an insurer, scheme mergers, bulk transfers, pension increase exchanges and transfer value

exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) necessary for our legitimate interests in pursuing the purposes set out in (a) to (e) above, and (when we make the disclosures to BNP Paribas for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of BNP Paribas, such interests in each case not being overridden by your privacy interests;
- (ii) required to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies referred to below;
- (iii) necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and
- (iv) in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits or where the Scheme Rules require you to provide information which we cannot otherwise process without your consent.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect or continue to use this personal data we may be unable to administer your benefits or record, calculate or pay your or your beneficiaries' benefits.

Disclosures of your information

We typically share your information with the following recipients:

- our suppliers, including BNP Paribas and other providers of services to us and them, such as administrators (Barnett Waddingham), our Additional Voluntary Contributions (AVC) provider (Fidelity International), financial advisers (to provide you with financial advice) and our appointed financial adviser for members (Work Place Solutions), the Scheme actuary (Aon) for actuarial calculations, scheme auditors (Crowe UK LLP) for the annual report of accounts, AVC investment advice (Aon), our Risk Settlement advisers (Lane Clarke and Peacock LLP), and providers of printing, communication, IT and hosting, and tracing services (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);
- Aon Solutions UK Limited ("Aon") is the appointed Scheme Actuary and acts as a data controller. Aon also provide some advice to the Bank in relation to the Scheme. More detail about Aon's use of your personal information is set out in their full Privacy 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 Aon, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH
- BNP Paribas, such as for audit purposes or in relation to corporate transactions initiated by BNP Paribas;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (e) above;

- public authorities, regulators or government bodies (such as HMRC and the Pensions Regulator), including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- others persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others (such as the Pensions Ombudsman).

Transfers of your information abroad

The use and disclosure of your information, for the purpose referred to in a, b and e above, may involve transferring your information outside of the European Economic Area. Those countries include India.

In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected in compliance with applicable data protection rules. To ensure an appropriate level of protection, we typically use a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) relevant authority in the United Kingdom. Further details of these transfers and copies of these agreements are available from us on request.

Retention of your information

We will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within our retentions management documentation. We determine the period envisaged within such documentation with regard to the Scheme's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Scheme, and responding to legal claims or regulatory requests. In general, we will keep your information for the life of the scheme plus 12 years.

Your rights

You have rights under data protection law of access to and rectification or erasure of your personal data and to restrict its processing, to tell us that you do not wish to receive marketing information, and (in some circumstances) to require certain of your information to be transferred to you or a third party. To the extent, the use of your information is based on your consent, you have the right to withdraw your consent.

You also have the right to object to our processing of your personal data.

If you have any questions or wish to exercise any of the above rights, you may send an email to pensionandbenefits@uk.bnpparibas.com. You can also use this e-mail address if you wish to make a complaint about how we process your information.

You can also lodge a complaint about our processing of your personal information with the Information Commissioner's Office (www.ico.org.uk) or, if you are no longer resident in the UK, the relevant data protection authority in your country of residence.

Further information required to carry out requests

In some cases, it will be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

Status of this privacy notice

This privacy notice was last updated on 19 July 2023.

This document is a notice to you and not a contract between us. It may be subject to amendments. Any future changes or additions to the processing of personal data as described above in this private notice affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

Trustee of the Humberclyde Finance Group Pension and Life Assurance Scheme

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Contact: **BNP Paribas Group Pension Team** (pensionandbenefits@uk.bnpparibas.com)