

Northern Foods Pension Builder: Privacy Notice

The Trustee of Northern Foods Pension Builder (the “Scheme”, “we”, “our” or “us”) is committed to protecting your information and acting in accordance with your rights under all applicable laws and regulations from time to time in force relating to data protection and privacy, including (to the extent applicable) the General Data Protection Regulation (“GDPR”).

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, country of residence, national insurance number and in some cases bank account details, telephone number and email address;
- information relating to your benefits such as your member identifying number (which is your national insurance number), the date you joined or left the Scheme, your earnings, the category and value of benefits that you have built up or receive, and relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- in some cases, special categories of personal data such as 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 or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

In some cases, we will collect personal information about you indirectly from your (current or former) Northern Foods employer and from our service providers (e.g. the Scheme administrator, which is Capita).

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 plans;
- (b) for general administration of the Scheme, such as: to calculate, record and pay benefits; for reviews we or our administrators conduct for statistical and reference purposes; and for other 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 longevity hedging, insuring Scheme liabilities with an insurer, scheme mergers, bulk transfers, pension increase exchanges and enhanced 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 disclosures to your (current or former) Northern Foods employer for liability management exercises referred to below) or audit purposes necessary for the legitimate interests of that entity, such interests in each case not being overridden by your privacy interests;
- (ii) in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies referred to below; or
- (iii) in some cases, 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;
- (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 this personal data we may be unable to administer your contributions and benefits or record or calculate or pay your or your beneficiaries' benefits.

Disclosures of your information

We typically share your information with the following recipients:

- our suppliers, such as our administrators (Capita), and other providers of services to us and them including the Pension Executive team, Scheme Actuary (Aon Hewitt who are also a Data Controller and their privacy announcement is attached), Communication, IT and web site hosting consultants (AHC Consulting) and member tracing services. 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;
- your (current or former) Northern Foods employer, such as for liability management exercises initiated by that entity;
- insurance and reinsurance companies, such as if we carry out the activities referred to in (e) above;

- public authorities, regulators or government bodies, 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
- other persons from time to time, such as the Pensions Regulator and the Pensions Ombudsman, 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.

Transfers of your information abroad

The use and disclosure of your information, by the Trustee (and its Data Processors) for the purpose referred to above does not involve transferring your information to countries outside of the European Economic Area.

If this situation changes you will be notified accordingly.

Aon Hewitt who are also a Data Controller may transfer data out of the European Economic Area. For actuarial calculations, for example, they use specialists located in India who are permitted to access pseudonymised data for the purposes of performing actuarial calculations. Please see their own Privacy Notice which is attached.

Retention of your information

We will keep your information for the longer of the period required in order to:-

- (1) administer the Scheme in accordance with (a) to (e) above;
- (2) to meet our legal or regulatory responsibilities.

In most circumstances this will mean that member records are held indefinitely but the Trustee will continue to consider whether this is appropriate on a case by case basis.

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 peter.croskin@nfpensions.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 may be required to carry out requests

In some cases, it may 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 1 May 2018.

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 either directly or via a member newsletter. The current version of the privacy notice can be obtained at www.nfpensions.com under Member Communications.

If you wish to write to the Trustee about this privacy notice, please address your letter to:

Northern Foods Pension Builder
Capita
Hartshead House
2 Cutlers Gate
Sheffield
S4 7TL

R F Boyes
Chairman
Northern Foods Trustees Limited

1 May 2018

Aon Hewitt Limited "QUICK READ" PRIVACY NOTICE

Aon Hewitt Limited (and, where appointed, 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/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>, or you can request a copy by contacting us, including reference to the scheme name, at: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH