

Spirit (Legacy) Pension Scheme: Privacy Notice

The Trustee of the Spirit (Legacy) Pension Scheme (the “**Scheme**”, “**we**”, “**our**” or “**us**”) 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 the Scheme collects about you, what we do with this information, the lawful bases on which personal information is processed and what rights you have.

For the purposes of this notice, the term 'Company' refers to Greene King.



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, 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 benefits that you have built up or receive, and relevant matters impacting your benefits such as voluntary contributions, pension sharing orders (including information in divorce or dissolution certificates), tax protections or other adjustments.
- records of communications with you (including any complaints); and
- 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 nominated beneficiaries, dependants or next of kin (for example, when you submit an expression of wish form). 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 the Company, which is the sponsoring employer of the Scheme, and from our service providers (e.g. the Scheme administrator, which is currently Aon).

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 record and pay benefits; for actuarial valuations, for electing member nominated trustee directors; for providing you with news about the scheme; 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 obtaining life insurance and longevity hedging.

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 the Company for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of the Company, 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;
- (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, where the processing relates to personal data manifestly in the public domain, or for reasons of substantial public interest (such as obtaining insurance when we carry out the activities referred to in (e) above); or
- (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.

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Disclosures of your information

We typically share your information with the following recipients:

- our suppliers, including the Company and other providers of services to us, such as the Scheme administrator (currently Aon), financial advisors (including LEBC), Scheme Actuary (currently Roger Moring and Aon), the life insurer (currently Canada Life), legal advisors (currently Linklaters LLP), investment advice (currently Aon), additional voluntary contribution provider (currently Standard Life Assurance Limited, Equitable Life Assurance Society, Prudential Assurance Company Limited and Aviva PLC) and audit services (currently PricewaterhouseCoopers LLP). 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.
- the Company, such as for audit purposes, in relation to corporate transactions or exercises (such as pension increase exchange exercises) initiated by the Company.
- insurance and reinsurance companies, such as when 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 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.

Full details on Aon's use of your personal information can be found online at <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>.

Transfers of your information abroad

The use and disclosure of your information for the purposes referred to above may involve transferring your information to countries outside of the United Kingdom or European Economic Area. 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.

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 retention policy. 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 Schemes; and responding to legal claims or regulatory requests. In many cases, we will keep your information for up to 12 years after your death or the death of any person whose claim to benefits arises because of your membership.

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 spirit.group.mailbox@aonhewitt.com, or a hard copy letter to **Aon, PO Box 196, Huddersfield HD8 1EG** or you may call us on **0370 8506840**. You may also use these channels 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).

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 in March 2023.

This document is 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 privacy notice, which affect you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

The Trustee of the Spirit (Legacy) Pension Scheme