

Minova Pension Trustee Limited Privacy Notice

Minova Pension Trustee Limited as trustee of The Pension & Assurance Scheme of BMS Associates Limited and the BMS Harris & Dixon Insurance Brokers Limited Pension & Life Assurance Scheme (the "Schemes")

This Privacy Notice has been issued by the Trustee and Scheme Actuary of the Schemes to comply with the Data Protection Act 2018, which reflects the provisions of the EU's General Data Protection Regulation (GDPR) and which came into effect on 25 May 2018. This document replaces any Fair Processing Notice issued under the Data Protection Act 1998.

Data controller(s) and Data Protection Officer(s)

The Trustee of the Schemes is Minova Pension Trustee Limited. The Actuary to both Schemes is William Bennett of Barnett Waddingham LLP.

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustee and the Actuary are considered "joint data controllers" (the holders, users and processors of personal data) for the purposes of the GDPR.

The joint data controllers can be contacted as follows:

Company Secretary
Minova Pension Trustee Limited
One America Square
London EC3N 2LS

William Bennett
Barnett Waddingham LLP
St James's House, St. James's Square
Cheltenham GL50 3PR

Email: BMSCoSec@BMSGroup.com

Email: william.bennett@barnett-waddingham.co.uk

Telephone: 020 7480 7288

Telephone: 0117 313 7237

Use, transfer and storage of personal data

In the course of running the Schemes, we may require information from you in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner's) health. Such information will be used by the Schemes' administrators to determine the benefits payable to you and your beneficiaries.

In addition, we may hold any or all of the following items of personal information about you:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the relevant Scheme).
- Salary and data relating to investments and pension assets held outside of the relevant Scheme (to the extent they are relevant for the calculation and payment of your benefits, or to the taxation of your benefits from the Scheme).
- Employment history, including employment dates and historic pay records.

- Bank account details for payment of benefit instalments, HMRC tax code.

Your personal data will have been provided to the data controllers by your employer or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the relevant Scheme. Your personal data will be stored until such time as we no longer need it but in any event for not longer than 15 years after the date the Scheme is wound up.

The Trustee shares your data with the Schemes' administrator, Barnett Waddingham, the Actuary, the sponsoring employer(s) (Minova Insurance Holdings Limited) and AVC providers. They may also share data with the Trustee's other professional advisers (including the Scheme's legal advisors, Auditor and pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator).

The Trustee can share your data with the employer for the purposes of providing information to the members about access to the pension freedoms (either via a one-off exercise or as a business as usual offering) or other incentive exercises (such as PIE).

Your data may be shared by the Schemes' administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. A list of parties with whom data may be shared is available on request in writing to the Trustee at the address above.

The Scheme administrators, on behalf of the Trustee, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustee's **legal obligation** to run the Schemes in accordance with the relevant Trust Deed and Rules. The Trustee and / or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in both yours and the Trustee's **legitimate interests** to use your personal information to:

- Keep up to date and accurate records about your membership of the relevant Scheme
so that the correct benefits can be paid
- Undertake risk-management exercises
so that the risk your benefits are not paid is reduced
- Comply with the law, including regulations and guidance issued by the Pensions Regulator
so that you, the Trustee and their advisers are not subject to legal sanctions which may impact benefits
- Efficiently manage the impact of any change to the legal status of the sponsoring company
so that your benefits are not adversely affected for example by a sale or company merger

The Actuary uses your personal data to advise the Trustee on the financial management of the relevant Scheme. This advice helps to ensure the Trustee is able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous

Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

The Actuary will not pass your personal data to any third party without the prior agreement of the Trustee. Your personal data will not be directly transferred to another country unless you request for this to be done.

Your rights in relation to your data

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. If you wish to request copies of your personal data please contact either of the joint Data Controllers at the addresses above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the Data Controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to lodge a complaint about a data controller with the ICO.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustee may not be able to perform their duties in relation to the Schemes, and your benefits could be affected.

Further details about GDPR and your rights under GDPR can be found on the ICO's website at <https://ico.org.uk/>

PAN Trustees

Please note that PAN Trustees UK LLP ("PAN") has been appointed as the Schemes' Independent Trustee Director and as a result it may be passed and hold personal data through its role as a Trustee Director of Minova Pension Trustee Limited. As such this Privacy Notice covers the time while it is a Trustee Director of Minova Pension Trustee Limited.

PAN may also continue to hold personal data collected through its role as a Trustee Director of Minova Pension Trustee Limited even when it is no longer a Trustee Director. Information about PAN's approach to data security in that situation as a firm can be found at <https://www.pantrustees.co.uk/Scheme-GDPR/>

June 2023