

PRIVACY NOTICE

for the Sandvik Pension Plan 2001 Plan (the "Plan")

This privacy notice is for members and beneficiaries of the Plan. It has been prepared by Andy Taylor, Alison Ronnie, Alan Boulton, Frank Kimberlin, Peter Rose and John Eustace ("**Trustees**", or "we") in their capacity as trustees of the Plan.

This notice will also be made available online.

This privacy notice replaces the previous version of this privacy notice produced in August 2019 and supplements any other notices and statements we issue that are specific to particular data collection / processing activities.

Why we are providing this notice to you

As the trustees of the Plan we hold certain information about you and from which you can be identified (either from the information itself or with other information that we may hold) ("**personal data**"). In line with the transparency requirements of applicable data protection laws, we are required to give you specified information about the personal data we hold about you, how we use it, and the safeguards that are in place to protect it. This notice is designed to give you that information.

Why we process your personal data

The Trustees process personal data about you, in their role as controller, for the proper handling of all matters relating to the Plan, including its administration and management, calculating, securing and paying benefits and managing liabilities in relation to it. Further information about how we process this data is provided under the heading "*How we will use your personal data*" below.

The lawful basis for our use of your personal data will in most cases be that the processing is necessary for us to comply with our legal obligations as trustees of the Plan, or because we need to process your personal data for the legitimate interests of: administering and managing the Plan and liabilities under it; calculating, securing and paying benefits; and performing our obligations and exercising any rights, duties and discretions the Trustees have in relation to the Plan.

In certain circumstances we may also rely upon the lawful basis that the processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract. Where we are processing "special categories" of particularly sensitive data and you have given consent to the processing of that personal data (please see below for further information) then the provision of your consent will be the legal basis that we rely upon in relation to that processing.

What personal data we hold and how we obtain it

The types of personal data we hold and process about you can include:

- Contact details, including name, address, telephone numbers and email address
- Identifying details, including date of birth, national insurance number and employee and membership numbers

- Information that is used to calculate and assess eligibility for benefits, for example service dates and salary information
- Financial information relevant to the calculation or payment of benefits, for example bank account and tax details
- Information about your family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death
- Information about your health, for example, to assess eligibility for benefits payable on ill health, or when your health is relevant to a claim for benefits following the death of a member of the Plan
- Information about a criminal conviction if this has resulted in you owing money to your employer or the Plan, and the employer or Plan may be reimbursed from your benefits

We obtain some of this personal data directly from you. We may also obtain data from your current or past employer(s) or companies that succeeded them in business (for example salary information), from a member of the Plan (where you are or could be a beneficiary of the Plan as a consequence of that person's membership), and from a variety of other sources including public databases, our advisers, and government or regulatory bodies.

Where we obtain information concerning certain "special categories" of particularly sensitive data, such as health information, extra protections apply under the data protection laws. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by data protection laws. You have the right to withdraw your consent to the processing at any time by notifying the Trustees in writing. However, if you do not give consent, or subsequently withdraw it, the Trustees may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Plan, please ensure that those individuals are aware of the information contained within this notice.

How we will use your personal data

We may use this data to deal with all matters relating to the Plan, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- to contact you
- to assess eligibility for, calculate and provide you (and, if you are a member of the Plan, your beneficiaries upon your death) with benefits
- to identify your potential benefit options and, where relevant, implement those options
- to allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements
- to assess and, if appropriate, action a request you make to transfer your benefits out of the Plan
- to comply with our legal and regulatory obligations as trustees of the Plan
- to respond to queries from you and others that may receive benefits as a consequence of your membership, and to address any actual or potential disputes concerning the Plan
- the management of the Plan's liabilities, including the entering into of insurance arrangements and selection of Plan investments
- for statistical and financial modelling and reference purposes

We may process your personal data when corresponding with the sponsoring employers of the Plan in connection with your employment or their obligations as employers. We may also process your personal data in connection with the sale, merger or corporate reorganisation of the employers that sponsor the Plan and their group companies.

We may also process your personal data when liaising with, or responding to orders or requests from, government bodies and dispute resolution and law enforcement organisations, including the courts, the Pensions Regulator, the Pensions Ombudsman, the Pension Protection Fund and Her Majesty's Revenue and Customs (HMRC).

Organisations that we may share your personal data with

From time to time we will share your personal data with our advisers and service providers so that they can help us carry out our duties, rights and discretions in relation to the Plan. These include the following:

- The Plan administrator, currently Mercer.
- The Plan actuary, currently Dave Robinson of Mercer.
- Investment advisers, currently Mercer.
- The Plan's provider of consultancy services, currently Mercer.
For information about how Mercer use your data, please see their privacy notice, <https://www.uk.mercer.com/privacy.html>
- The legal advisers to the Trustees, currently Squire Patton Boggs (UK) LLP. For information about how Squire Patton Boggs (UK) LLP use your data, please see their privacy notice, <https://www.squirepattonboggs.com/en/footer/privacy>
- The Plan's auditors, currently Deloitte LLP. For information on how Deloitte LLP use your data, please see their privacy notice, https://www2.deloitte.com/uk/en/footerlinks1/privacy.html?icid=bottom_privacy
- Additional voluntary contribution providers, currently: Utmost Life and Pensions, Scottish Widows, Prudential Life, and The Canada Life Assurance Company. For further details on how these AVC providers use your data, please contact them. Their contact details can be found at:
 - <https://www.utmost.co.uk/>
 - <http://www.scottishwidows.co.uk/>
 - <http://www.prudential.co.uk/>
 - <https://www.canadalife.co.uk/>
- The Plan's banks
- Suppliers of IT, document production and distribution services
- Sandvik Holdings Limited and group companies (and their advisers and any potential purchasers of their businesses). Please note that data would only be shared with a potential purchaser of the business under a confidentiality agreement.
- Government bodies and dispute resolution and law enforcement organisations, including the courts, the Pensions Regulator, the Pensions Ombudsman, the Pension Protection Fund and Her Majesty's Revenue and Customs (HMRC). This is done where requested by the relevant body, or if we consider that it is reasonably required. The relevant body may then use the data to carry out their legal functions.

In some instances advisers and service providers will be controllers in their own right and will be directly responsible to you for their use of your personal data. They may be obliged under the data protection laws to provide you with additional information regarding the personal data that they hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers directly, for example, via their websites. Whenever one of our advisers or service providers acts as a joint controller with us in respect of your personal data, because we jointly

determine the purposes and means of processing it, we will agree with them how we are each going to meet our respective and collective obligations under the data protection laws. If you would like more information about how such an arrangement works please contact us using the contact details below.

We may also provide some of your data to the Plan's sponsoring employers and group companies of those employers, their advisers and potential purchasers of their businesses.

In addition, where we make investments or seek to provide benefits for Plan members in other ways, such as through the use of insurance or pension plan mergers, then we may need to share personal data with providers of investments, insurers and other pension plan operators.

The advisers, service providers and organisations referred to in the paragraphs above may use personal data to perform their functions as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties (for example, insurers may pass personal data to other insurance companies for the purpose of obtaining reinsurance), to the extent they consider it appropriate to do so.

Where requested or if we consider that it is reasonably required, we may also provide your personal data to government bodies and dispute resolution and law enforcement organisations, including the courts, the Pensions Regulator, the Pensions Ombudsman, the Pension Protection Fund and HMRC. They may then use the data to carry out their functions.

Transferring information outside the UK

In some cases recipients of your personal data may be outside the UK. This means your personal data may be transferred outside the UK to a jurisdiction that has not been assessed by the UK Government as providing an adequate level of data protection.

If this occurs, additional safeguards must be implemented with a view to protecting your data in accordance with applicable laws. Please contact the Trustees using the contact details below, if you want information about the safeguards that are currently in place.

How long we keep your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purposes identified above. In practice this means that we will retain your data for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Plan and for so long afterwards as may be required to deal with any questions, complaints or claims that we may receive about our administration of the Plan. We may also retain your data for a longer period to comply with our legal and regulatory obligations.

Your rights

You have a right to access and obtain a copy of the personal data that the Trustees hold about you, and to ask the Trustees to correct your personal data if there are any errors or it is out of date or incomplete. In some cases you may also have a right to ask the Trustees to erase or restrict the processing of your personal data or to transfer your personal data.

In certain circumstances, you have the right to object to the processing of your personal data; for example, you have the right to object to processing of your personal data which is based on the legitimate interests identified in the section above headed "*Why we process your personal data*", or where the processing is for direct marketing purposes.

You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via its telephone helpline (0303 123 1113).

If you wish to exercise any of these rights or have any queries or concerns regarding the processing of your personal data, please contact the Trustees using the contact details provided below. You also have the right to lodge a complaint in relation to this privacy notice or the Trustees' processing activities with the Information Commissioner's Office - you can do this via the ICO's website or telephone helpline.

As explained in the section above headed "*How we will use your personal data*", one of the reasons we collect and hold your personal data is to administer your Plan benefits. If you do not provide the information we request, or ask that the personal data we already hold is deleted or that the processing of the personal data be restricted, this may affect our ability to administer your benefits, including the payment of benefits from the Plan. In some cases it could mean the Trustees is unable to put your pension into payment or have to stop your pension (if already in payment).

Updates

We may update this notice periodically. Where we do this, we will inform you of the changes and the date on which the changes take effect.

Contacting us

Please contact the Trustees for further information using the contact details below.

Trustees of the Sandvik Pension Plan 2001
Mercer Limited
1 Whitehall Quay
Leeds
LS1 4HR
email: sandvik.pensions@mercer.com