

## **Macfarlane Group PLC Pension and Life Assurance Scheme (1974)**

### **Trustees Privacy Statement**

The Trustees of the Macfarlane Group PLC Pension and Life Assurance Scheme (1974) (the **Trustees**) are the Data Controller of personal information collected by or provided to them about members and their spouses, partners and/or any dependants in connection with and for the purpose of administering the Macfarlane Group PLC Pension and Life Assurance Scheme (1974) (the **Scheme**) and the AVC arrangement linked to the Scheme.

### **Why we are providing this statement?**

As the Trustees of the Scheme we hold certain information about you ("personal data") which we use to ensure effective administration of the Scheme and to pay benefits from it. This notice is designed to give you information about the data we hold about you, how we use it, your rights in relation to it and the safeguards that are in place to protect it.

### **Types of data processed by the Trustees**

The type of personal information held by the Trustees which constitutes personal data may include, but is not limited to:

- Full name;
- Home address and other contact details;
- Gender;
- Date of birth;
- Marital (or relationship) status;
- National Insurance number;
- Annual (or pensionable) salary;
- Other forms of remuneration;
- Sort code and account details to facilitate payments to you;
- Benefit entitlements; and
- Death benefit nominees.

### **What information do we collect from or about you?**

We, the Trustees, will collect and process the following data about you to administer the Scheme and your membership of it:

#### Information you give us.

This is information about you that you give us by filling in forms, by corresponding with us by phone, e-mail or otherwise. The information may include your name, address, telephone numbers (fixed line and mobile), email addresses, age, date of birth, gender, employment details (including dates of employment, full or part time employment status, financial information and bank account details, HMRC and tax details, National Insurance Number, details relating to health, lifestyle and social

circumstances, education, details of your family, dependants and beneficiaries and any other information that is required to administer your pension.

Some of the personal information that we collect may be sensitive information, for example information relating to your physical or mental health.

#### Information which we may collect from others

We may collect and process personal data about you from Macfarlane Group PLC or third parties. This may include information relating to your employment, salary and benefit rights, to the extent relevant for the purpose of the Scheme. We may on occasions collect personal data relating to you from third parties such as HM Revenue & Customs and other regulatory authorities.

The Trustees may also provide personal data to suppliers of data processing or administration services, to whom certain tasks associated with the administration of the Scheme have been outsourced. Personal data may also be provided to potential or actual acquirers of any Macfarlane Group PLC company or business, subject to appropriate measures having been taken as regards the confidentiality of the data.

#### **How will we use this information?**

We will use this information to administer the Scheme and your membership of it, including:

- For the administration and effective management of the Scheme (as a whole and your membership of it), by us and any third party to whom we have delegated obligations arising in connection with your pension;
- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;
- To communicate with you by mail, telephone, email, text (SMS) message or other electronic means (including to notify you about any changes to our services);
- To manage our relationship with you and to update, consolidate and improve the accuracy of our records;
- For analysis purposes by us and, to the extent necessary, any other organisation required (such as our external advisors, including legal advisers, and our insurers);
- To prevent and detect crime, carry out regulatory checks and meet regulatory requirements and/or legal obligations;
- Where you have provided the appropriate permissions, to market and advertise to you products in which you may be interested (although you may notify us at any time to cease use of your personal data for these purposes);
- To develop and improve our services to scheme members and beneficiaries and protect our interests; and/or

- To comply with our auditing and/or reporting, and any legal and regulatory, requirements.

### **Who may we give your information to?**

We may disclose your personal information (and that of your spouse, partner and/or any dependants) to:

**The Scheme Administrator:** We have appointed Aon Hewitt (4396810- Registration) of The Leadenhall Building, 122 Leadenhall Street, London, EC3V 4AW to administer the Scheme to act on our behalf as **Scheme Administrator**.

The Scheme Administrator will process your personal information on our behalf as our Data Processor. The Scheme Administrator's privacy statement is accessible 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 Aon, including reference to the scheme name, at: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH:

**The Company:** Macfarlane Group PLC (SC4221 – Registration) of 3 Park Gardens, Glasgow, G3 7YE. The company will process personal information on our behalf as a Data Processor. The Company privacy policy is accessible at: <https://www.macfarlanegroup.com/>

- Claimants, beneficiaries, assignees and payees;
- The appointed auditors of Macfarlane Group PLC and Macfarlane Group PLC Pension and Life Assurance Scheme (1974);
- Pension schemes with which the person whose personal information we are processing has an association;
- Professional advisers;
- Financial organisations and advisers;
- Central government;
- Service providers;
- Ombudsmen and regulatory authorities;
- Family, associates or representatives of the person whose personal data we are processing;
- Current, past or prospective employers;
- Tracing agencies;
- Any professional financial adviser(s) that you have appointed in respect of your financial arrangements (including your pension); and

- Third party who requires the information in connection with administering your pension (including tracing companies, external advisers (such as lawyers, consultants, actuaries, accountants), insurance companies, regulators and ombudsmen, research and analytics providers).

Any data held by Macfarlane Group PLC, the Trustees and any third party will be treated as confidential. We will not sell your information to any third parties nor will any third party to whom we disclose your information.

**You consent to us obtaining any pensions or related details, including the information detailed above, which we require for the administration of your benefits.**

Some data, for example data in relation to your health or personal life, is regarded as 'sensitive personal data', and cannot be used without your specific consent at the time. Therefore, there may be specific situations in which we would require your explicit consent.

**You consent to us providing your information to the third parties as described above and to any regulatory authorities or other third parties as may be required.**

### **International data transfers**

You consent to the transfer of your personal information to a country or territory outside the European Economic Area, whether by us or by a third party to whom we disclose your personal information in accordance with this Privacy Policy and relevant Data Protection Regulations.

### **Consent**

By proceeding to use our services and being a member of the Scheme, you consent to the collection, use, storage, disclosure to third parties and transfer outside of the EEA of your personal information (including any sensitive personal information) by us, anyone administering the Scheme on our behalf and as described in this Privacy Policy and as outlined by Data Protection Regulations.

### **Your rights under the GDPR**

You have rights under the GDPR including:

- the right to access your personal data;
- the right to have your personal data rectified if it is inaccurate or incomplete;
- the right to have your personal data deleted or removed if there is no reason for its continued storage and processing;
- the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances;
- the right to request the transfer of your personal data to another party; and
- where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent.

If you wish to exercise any of these rights, please contact us as explained below.

## **Change to the Privacy Statement**

We reserve the right to make changes to this statement and to our data protection policies and procedures. Where we do, the changes will extend to personal data obtained by us prior to the date of the change, unless we decide otherwise. If we change the statement, the revised version will be forwarded to home addresses within 6 months of the change.

## **Contacts and Complaints**

Should you have further questions regarding the processing of your personal information, or make a complaint, please contact the Scheme Administrator at: [macfarlanes.pensions@aonhewitt.com](mailto:macfarlanes.pensions@aonhewitt.com) or

Macfarlane Group PLC Pension and Life Assurance Scheme (1974)  
Aon  
PO Box 196  
Huddersfield  
HD8 1EG

If you are still employed by Macfarlane Group PLC and have questions about your payments to the Scheme, your employment or benefits, please contact your HR representative on 02476 5118511 or by e-mailing [humanresources@macfarlanepackaging.com](mailto:humanresources@macfarlanepackaging.com).

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO).

You can also find general guidance on the law governing the protection and processing of personal data on the ICO website at <https://ico.org.uk/>.