

Trustee Privacy Notice – Morrison Pension and Life Assurance Plan

Purpose	Trustee Privacy notice
Related policies, statements and registers	MG-DS001 - Data Protection Policy MG-DS003 - Data Breach Policy MG-DS004 - Data Breach Log
Applicable to	AWGPT Trustee Directors Scheme Secretary Internal Pensions Team Trustee Advisers Trustee Service Providers
<i>General code reference</i>	<i>ADM006 – Data Monitoring</i>
Review period	Every three years or earlier if required
Effective date	5 October 2023

Privacy Notice

Morrison Pension and Life Assurance Plan

Data protection laws require us to provide you with information about how the trustee (“the Trustee”) of the Morrison Pension and Life Assurance Plan (“MPLAP”), protects and respects your privacy when dealing with your MPLAP benefits. This notice is for members and beneficiaries of the MPLAP, and has been prepared by the Trustee.

This Privacy Notice has been designed to explain clearly what personal data we use, how we use it, the legal reasons why we need to use it in order to provide you with a pension and the limited circumstances in which we share that personal data (for example with service providers like Barnett Waddingham LLP, the Plan Administrator). We also describe the safeguards that are in place to protect it.

Please read this Privacy Notice as it contains important information about how you can contact the Trustee if you have any questions.

Who to contact about your personal data.

If you wish to:

- see your personal data or to exercise any of the rights mentioned in this notice
- make a complaint about how we have handled your personal data

please contact our office at:

The Plan Secretary, Anglian Water, Lancaster House, Lancaster Way, Huntingdon PE29 6XU
Email: pensions@awg.com

Who we are.

As the Trustee of MPLAP we hold certain personal information (known as “personal data”) about plan members and, where applicable, their dependants and beneficiaries. Most of the personal data held and processed by the Trustee in running MPLAP will be personal data (in other words, it is information from which you as an individual can be identified).

For legal purposes, the Trustee is known as the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership or your right to benefits from MPLAP, we may hold some or all of the following information about you:

- your name and date of birth
- your contact details such as address, email address or telephone numbers
- your marital status
- your salary and employment information
- details about your pension benefits
- your national insurance number
- details of your bank account and/or tax details (to pay benefits)
- details about your dependants and/or beneficiaries so we can pay benefits following your death
- medical and other details about your health that you have given us.

How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer MPLAP and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members and beneficiaries under MPLAP’s governing documents, as well as under relevant legislation. We will not collect any personal data from you that we do not need.

Personal data relating to members and beneficiaries of MPLAP is held on paper and on computer systems. As the “data controller”, the Trustee must process this information fairly and lawfully.

As part of running MPLAP, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as “special category data”). Under the legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as “special category data”. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

How do we collect your information?

We may collect personal data:

- directly from you when you correspond with us by phone, e-mail or otherwise or when you provide us with any additional information, when you attend worksite presentations, roadshows or other events, ;
- from third parties such as our service providers (for example, our MPLAP administration provider), the employer AWG Group Ltd, another pension scheme if you have transferred benefits, where a member includes your details in a beneficiary nominee form, from a third party in relation to an event affecting you (for example, in the event of serious ill health), or from third party agencies or publicly accessible sources to try and find you when we have lost contact with you. We also work closely with third parties (including, for example, GPs and consultants);
- from regulatory authorities (such as The Pensions Regulator) or government departments (such as HMRC or the Department for Work and Pensions).

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.

What is our legal basis for using your information?

We must by law provide benefits in line with the MPLAP's governing documents (Trust Deed and Rules) and must also meet other legal requirements when looking after the MPLAP. We will use your personal data to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud. We may need to share your personal data with other people for this reason, such as courts and law-enforcement agencies.

We also have a legitimate interest in properly looking after the MPLAP. This includes paying benefits as they fall due; buying insurance contracts; communicating with you; and ensuring that correct levels of benefits are paid, that benefits are correctly calculated, and that the expected standards of MPLAP governance are met (including standards set out in The Pensions Regulator guidance).

If we need to use information about your health (or other very personal and private information) we may ask your consent. However, sometimes there may be reasons of public interest or law that enable us to use this information without consent, for example, for the purposes of making a determination in connection with your eligibility for the MPLAP or with any benefits that may be payable under the MPLAP. If we have asked for and you have given us your consent, you can withdraw your consent at any time by using the details in the 'Who to contact' section. This may affect what we can do for you, unless we have another lawful reason for using your information.

Sometimes your personal data may be used for statistical research but only in a form that no longer identifies you.

Who we share it with

As the Trustee needs help from various advisers to properly administer MPLAP we share personal data with the following:

- AWG Group Limited (the current sponsoring employer of MPLAP) and any other companies within the same corporate group

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- MPLAP's professional advisers, including MPLAP's actuary, administrators, auditor, medical advisers, investment adviser and lawyers. The Plan's Actuary, Aaron Punwani of Lane Clark & Peacock LLP, is also a data controller in respect to your personal data that he uses to carry out his functions. For further information please see <https://www.lcp.uk.com/privacy-policy/>
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you
- the company which runs our administration systems
- the company which hosts our Trustee website and the external electronic storage provider
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions
- insurance companies with which we may secure benefits for members or beneficiaries of MPLAP
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System) in the UK and/or a payment via SWIFT when pensions are being paid overseas
- Beneficiary or mortality tracing agencies

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 legislation. If you would like more information about how such an arrangement works, please contact us using the contact details below.

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 the information is reasonably required for a legitimate purpose.

Where the recipients of your personal data are outside the UK, the appropriate safeguards must be implemented with a view to protecting your data in accordance with applicable laws.

Please contact the Trustee, using the contact details above in the section 'Who to contact about your personal data', if you want information about the arrangements and safeguards that are currently in place.

How long we keep personal data for

- We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required

to keep some of your personal information for the rest of your life so that we have the information we need to pay benefits and answer queries about benefits.

- We review the personal data held in relation to MPLAP on a regular basis in accordance with our data retention policy (as amended from time to time). If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

Your rights

- You have the right to transparency over how we use your data and to make a subject access request
- You have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- If at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected
- You can require the Trustee to restrict the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- You can object to your personal data being processed
- You can request that your personal data is deleted altogether.
- You have a right to claim compensation for material or non-material damage caused if we breach the data protection laws

You should be aware that taking some of the above steps could impact on the payment of your benefits and our ability to answer questions relating to your benefits. Please note that in certain circumstances the Trustee can take steps to override a member's request to object to processing, to withdraw consent or to delete personal data, in light of our fiduciary duties to administer your pension benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

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

Security precautions in place to protect against the loss, misuse or alteration of your information

We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. Details of these measures can be obtained on request.

Third parties will only process your personal information on our behalf on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Our security measures are regularly reviewed.

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline: 0303 123 1113.

This notice is valid from 5 October 2023. 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.

Stephen Yandle

5 October 2023

Stephen Yandle (on behalf of Zedra Governance Ltd)

Chair of Trustees

Date