

CP Holdings Limited (1986) Retirement Benefits Scheme (the “Scheme”)

Privacy Notice

This Privacy Notice has been issued by the directors of CP Holdings (Pensions) Limited as the Trustee of the Scheme, to comply with the General Data Protection Regulation (GDPR). It has been updated to reflect a change in the Scheme Actuary for the Scheme, with effect from 5 July 2022.

You should share this Privacy Notice with your family and dependants where you have provided the Scheme with information about them.

Data controllers

In accordance with guidance issued by the Information Commissioner’s Office (ICO), the Trustee, the Scheme Actuary, Jonathan Maude of Barnett Waddingham LLP, and the Scheme auditor, Blick Rothenberg Audit LLP are considered “data controllers” (the holders, users and processors of personal data) for the purposes of the GDPR. Shoosmiths LLP, as legal advisors to the Scheme, are also a data controller. Their Privacy Notice can be accessed via their website: www.shoosmiths.co.uk.

The data controllers can be contacted by writing to: Chair of CP Holdings (Pensions) Limited, CP House, Otterspool Way, Watford, WD25 8JJ, or by email to CPHoldings@barnett-waddingham.co.uk.

Use, transfer and storage of personal data

In the course of running the Scheme, 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 Scheme’s 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 Scheme)
- Salary and data relating to investments and pension assets held outside of the Scheme (to the extent they are relevant to the calculation and payment of your benefits from the Scheme, 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 is provided to the data controllers by the Scheme’s employers 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 Scheme. Your personal data will be stored until such time as we no longer need it, which potentially could be for 7 years after the date that the Scheme is wound-up.

The Trustee shares your data with the Scheme’s administrator (Barnett Waddingham LLP), the Scheme Actuary, the Scheme’s annuity provider (Pension Insurance Corporation) and the participating employers of the Scheme (CP Holdings Limited, Balton CP Limited, Lenta Properties Limited and Waystone Limited). The Trustee may also share your data with its other professional advisers (including the Scheme Auditor and the Scheme’s legal advisers), insurers and with regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator) and any person you authorise to act on your behalf.

The Trustee may share your data with the participating employers and their advisers for the purposes of providing information to the members about access to the pension freedoms or other incentive exercises. Your data may be shared by the organisations mentioned above with their business suppliers for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. A comprehensive list of

parties with whom data may be shared is set out in the Trustee's formal Data Mapping document, available on request in writing to the data controllers 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 Scheme in accordance with the 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. Sometimes we may ask for your consent to use your personal data, for example where it relates to your health. We will let you know if this is the case.

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

- Keep up to date and accurate records about your membership of the 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 act in accordance with legal obligations*
- 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 Scheme Actuary uses your personal data to advise the Trustee on the financial management of the Scheme. This advice helps to ensure the Trustee is able to meet its obligations to pay members' benefits, and is necessary to comply with obligations placed on it by legislation, including the Pensions Act 2004. The Scheme 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. Personal data may however be transferred outside the UK or the EEA where the Scheme's service providers or their business suppliers host data outside the UK or the EEA. These transfers will be governed by the Data Protection Laws.

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 the data controllers at the address 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 the 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 its duties in relation to the Scheme, 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/>

Directors of CP Holdings (Pensions) Limited
As the Trustee of the CP Holdings Limited (1986) Retirement Benefits Scheme

July 2022