

Privacy notice for the Wincanton Pension Scheme

This privacy notice is provided by Wincanton Pension Scheme Trustees Limited (the “**Trustee**”), as Trustee of the Wincanton Pension Scheme (the “**Scheme**”). Contact details are set out at the end of this notice.

The UK’s data protection legislation includes the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025, the General Data Protection Regulation 2018 as it was incorporated by the UK following on from Brexit (“UK GDPR” and the Privacy and Electronic Communications Regulation 2023 which are together referred to as the “**data protection law**” and governs how personal information is used by organisations. The purpose of this policy is to help the Trustee comply with its obligations under the data protection laws in relation to its processing of personal data. In this policy, the terms “process” (and its derivatives) and “personal data” have the meanings given to them under the data protection laws.

The Trustee (the “Trustee”, “we”, “our” or “us”) is committed to protecting your personal information and acting in accordance with your rights under data protection law. The Trustee is known as the ‘data controller’, as we decide the purposes for and the means by which the personal information we hold is processed. The Scheme’s actuarial adviser, Hymans Robertson, acts as a joint data controller with the Trustee.

This notice explains what personal information we collect about you and how we use that information. We have also included some information about your rights.

What information we collect about you

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, address (including postcode), national insurance number, telephone number, email address, dependants, and bank account details once in receipt of benefits;
- information relating to your benefits, including your membership number, the date you joined or left the Scheme, your earnings, the value of contributions and benefits that you have built up or receive, your target retirement age, and any relevant matters impacting your benefits such pension sharing orders (including information on divorce or dissolution certificates), tax protections or other adjustments; and
- in certain cases, special categories of personal data such as your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews).

Where applicable, we also collect information about your beneficiaries, dependants or next of kin (for example, when you submit a nomination of beneficiary form). Before providing us with any such information, you should provide a copy of this notice to those individuals.

Personal information is collected directly from your employer (Wincanton plc and subsidiaries), or from third parties providing services to the Scheme, such as the Scheme Administrator, Capita.

How we use your information

Your personal information is held electronically and to a much lesser extent on paper. We use your information for the following purposes:

- communicating with you in relation to your benefits and contributions, payment of benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other pension schemes;
- for actuarial valuations and audit purposes;
- for administrative activities that become necessary from time to time (like member tracing should we happen to lose contact with you);

- when we, or relevant Wincanton Group companies, undertake activities from time to time, such as insuring Scheme liabilities with an insurer, obtaining life insurance, longevity hedging, purchasing annuities, bulk transfers, pension increase exchanges and advised transfer value exercises, including disclosures to advice providers to allow you to obtain financial advice and to other third parties (such as the trustees of the Wincanton plc Life Assurance Trust and other Wincanton group companies and their respective suppliers and insurers) in relation to the administration and distribution of insurance proceeds and benefits;
- when we make the disclosures to the Wincanton group companies for audit and corporate transaction purposes; and
- for meeting our on-going regulatory, legal and compliance obligations, including assisting with the investigation or prevention of crime;

The Trustee must process your information fairly and lawfully. Our use of your information as set out above is permitted by applicable data protection law because it is:

- necessary for our legitimate interests in pursuing the purposes set out above, and when we make the disclosures to the Wincanton Group companies necessary for the legitimate interests of the Wincanton Group, such interests in each case not being overridden by your privacy interests;
- required to meet our legal or regulatory responsibilities, when we make the disclosures to authorities, regulators or government bodies;
- processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits following your death or on the grounds of ill health;
- in certain cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain.

Who we share your information with

The Trustee needs support from various advisers to properly run the Scheme. We typically share your personal information with the following:

- Our suppliers, such as the:
 - Administrator, currently Capita, who is responsible for the day to day administration of the Scheme,
 - Scheme's actuarial adviser, currently Hymans Robertson LLP; we are required by law to have the Scheme's funding level assessed every three years,
 - Legal advisors, currently Linklaters LLP,
 - Investment Consultant, currently Mercer Consulting Limited, or we may ask an investment manager to investigate specific investments (e.g. the purchase of an annuity policy with an insurance company)
 - Auditor, currently PwC,
 - Printing and communication, currently Concert Consulting (UK) Limited, IT and hosting or member tracing providers, or
 - Any sub-contractors of our suppliers,
- Relevant members of the Wincanton group and their suppliers, such as:
 - Payroll providers,
 - Medical advisers (e.g. in relation to an ill health early retirement request)
 - Financial advisers (to provide you with financial advice),
 - Insurance companies (to insure death or ill health benefits),
 - Trustees of the Wincanton plc Life Assurance Trust,
 - Third parties such as for audit purposes or in relation to any corporate transactions,
- Public authorities, regulators or government bodies (such as HM Revenue & Customs, the Pensions Ombudsman and the Pensions Regulator); and
- Other persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or the rights of others.

When we do share your information with third parties, we take steps to ensure the recipients have reasonable data security standards, so that your personal data remains secure.

You can find out further details about how your personal information is used in the provision of services by the Scheme's actuarial adviser via the link below:

www.hymans.co.uk/media/uploads/How_Hymans_Robertson_uses_your_personal_data.pdf

Transfer of your information abroad

The use and disclosure of your information, may involve transferring your information outside of the European Economic Area. In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) relevant authority in the United Kingdom.

How long we keep your information for

We must keep all personal data safe and only hold it for as long as necessary in order to meet our legal or regulatory responsibilities. Given the nature of pension schemes (and to facilitate the payment of benefits to you or your beneficiaries), the Trustee will, in general, keep your information for the rest of your life and for an appropriate period after that to reflect the potential for queries and complaints.

However, we review the information held about you on a regular basis, in accordance with our Data Protection Policy. If we conclude that certain information is no longer needed, that information will generally be destroyed.

Your rights

You have the following rights under data protection law;

- **Right of Access** - You have the right to see information that is held about you and a right to have a copy provided to you, or someone else on your behalf.
- **Right to Rectification** - If at any point you believe that the information we hold about you is wrong, you can ask to have it corrected.
- **Right to Restrict or Object** - You can instruct the Trustee to restrict or object to our processing of your information in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.
- **Right to Withdraw Consent** - Where you have given us your consent to processing your information, you can withdraw that consent at any time.
- **Right to be Forgotten** - You can request that your information is deleted altogether, although the Trustee can override this request in certain circumstances.
- **Right of Data Portability** – You have the right to obtain, move or transfer your personal information to you or a named third party.

You can exercise any of these rights by using the contact details below. You should be aware that where we cannot collect or continue to use your personal data, we may be unable to pay your benefits, maintain your participation in the Scheme or simply answer questions relating to your membership.

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 lodge a complaint about our processing of your personal information with the office of the Information Commissioner in the UK (www.ico.org.uk) - or a supervisory authority in the Member State where you habitually reside or work, or where a breach has taken place. If you consider that the Trustee has infringed the Data Protection legislation in handling your personal data you have the right to complain to us using the process outlined under the Scheme's internal dispute resolution procedure.

Further information may be required to carry out requests

In certain cases, it will be necessary to obtain additional information from you, such as in order to carry out investigations into fraudulent activity, to process your request for a transfer of benefits, to retire early on grounds of ill-health or to collect information about your beneficiaries to help the Trustee decide who should receive payment of benefits in the event of your death. We will notify you when your information is required for this purpose.

Status of this privacy notice

This privacy notice was last updated on 15 April 2025. This document is a notice to you and not a contract between us. We reserve the right to amend it from time to time. Any future changes or additions to the processing of personal data as described in this privacy notice, which impact you, will be communicated to you in advance through an appropriate channel, depending on how we normally communicate with you.

Who to contact about your personal information or relating to the matters set out above

Please contact the Scheme's administrators, Capita, at the following address:

Wincanton plc Pension Scheme
PO Box 555
Stead House
Darlington
DL1 9YT

Tel: 0345 122 2032

June 2026