

PRIVACY NOTICE

for the HYDRO 1988 Pension Scheme (the “Scheme”)

This notice is for members and beneficiaries of the Scheme. It has been prepared by Hydro Pension Trustee Limited (“Trustee”, or “we”) in its capacity as trustee of the Scheme.

This notice will also be made available online: <https://www.hydroextrusions.com/en-GB/locations/europe/united-kingdom/offices/Hydro-extrusion-birtley/>

Why we are providing this notice to you

As the Trustee of the Scheme we hold certain information about you (“personal data”). We are required by law 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 hold your personal data

The Trustee processes personal data about you, in its role as controller, for the proper handling of all matters relating to the Scheme, 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 legal basis for our use of your personal data will generally be one or more of the following:

- a) We need to process your personal data to satisfy our legal obligations as Trustee of the Scheme
- b) We need to process your personal data for the legitimate interests of: administering and managing the Scheme and liabilities under it; calculating, securing and paying benefits; and performing our obligations and exercising any rights, duties and discretions the Trustee has in relation to the Scheme
- c) 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

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 length of service and salary information
- Financial information relevant to the calculation or payment of benefits, for example bank account/building society 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 Scheme
- Information about a criminal conviction if this has resulted in you owing money to your employer and the employer 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 Scheme (where you are or could be a beneficiary of the Scheme 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 legislation. 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 that legislation. You have the right to withdraw your consent to the processing at any time by notifying the Trustee in writing. However, if you do not give consent, or subsequently withdraw it, the Trustee 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 Scheme, 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 Scheme, 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 Scheme, 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 comply with our legal and regulatory obligations as Trustee of the Scheme
- 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 Scheme
- the management of the Scheme's risks and financial security, including the entering into of insurance arrangements and selection of Scheme investments
- for statistical and financial modelling and reference purposes
- in connection with the sale, merger or corporate reorganisation of the employers that sponsor the Scheme and their group companies

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 Scheme. These include the following:

- The Scheme actuary, currently Vishal Makkar of Buck Consultants Limited. Their privacy policy, which sets out how they carry out their obligations in relation to personal data, can be found on their website: <https://buck.com/uk/privacy-policy/>
- Actuarial consultants, currently Buck Consultants Limited. Their privacy policy, which sets out how they carry out their obligations in relation to personal data, can be found on their website: <https://buck.com/uk/privacy-policy/>

- Investment advisers, currently Buck Consultants (Administration and Investment) Limited. Further information on how they use your data and their privacy notice is available on request, please contact them via the Scheme administrator (details at the end of this notice)
- The Scheme administrator, currently Buck Consultants (Administration and Investment) Limited. Their privacy policy, which sets out how they carry out their obligations in relation to personal data, can be found on their website: <https://buck.com/uk/privacy-policy/>
- The legal advisers to the Trustee, currently Squire Patton Boggs (UK) LLP. Their privacy policy, which sets out how they carry out their obligations in relation to personal data, can be found on their website: <https://www.squirepattonboggs.com/en/footer/privacy>
- The Scheme auditors, currently RSM UK Audit LLP. Their privacy policy, which sets out how they carry out their obligations in relation to personal data, can be found on their website <https://www.rsmuk.com/privacy-and-cookies>
- Additional voluntary contribution providers, currently Utmost and Clerical Medical. Their privacy policies, which sets out how they carry out their obligations in relation to personal data, can be found on their websites: <http://www.equitable.co.uk/privacy-notice/> and <http://www.clericalmedical.co.uk/Legal/Privacy.asp>
- The Trustee's insurers, currently Mercer and Zurich. Their privacy policies, which set out how they carry out their obligations in relation to personal data, can be found on their websites: <http://www.mercermarshbenefits.com/privacy-policy.html> and <https://www.zurich.com/en/services/privacy>
- Tracing bureaus for mortality screening and locating members and beneficiaries
- Communications advisers
- The Scheme's banks
- Suppliers of IT, document production and distribution services

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 legislation 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 direct, for example, via their websites. The service providers and advisers mentioned above may appoint service providers or sub-processors to help in the provision of these services.

The Scheme actuary, Buck Consultants Limited and Buck Consultants (Administration and Investment) Limited will also use your personal information to comply with their legal obligations. The Scheme Actuary is appointed by the Trustee to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. The Scheme Actuary will use your personal information for this purpose and has a legitimate interest in doing so. Further details are available on request.

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.

We may also provide some of your data to the Scheme's sponsoring employer Hydro Aluminium UK Limited (formerly Hydro Extrusion UK Limited) and group companies of that employer, their advisers and potential purchasers of their businesses.

In addition, where we make Scheme investments or seek to provide benefits for Scheme members in other ways, such as through the use of insurance or pension scheme mergers, then we may need to share personal data with providers of investments, insurers and other pension scheme operators. In each case we will only do this to the extent that we consider the information is reasonably required for these purposes.

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 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 Her Majesty's Revenue and Customs (HMRC). They may then use the data to carry out their functions.

In some cases, recipients of your personal data may be outside the UK. This means your personal data may be transferred outside the European Economic Area (EEA) to a jurisdiction that may not offer an equivalent level of protection as is required by EEA countries. If this occurs, 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 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 Scheme 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 Scheme. 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 Trustee holds about you and to ask the Trustee to correct your personal data if there are any errors or it is out of date or incomplete. 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 hold your personal data", or where the processing is for direct marketing purposes. In some cases, you may also have a right to ask the Trustee to erase or restrict the processing of your personal data, or to transfer your personal data. 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 Trustee using the contact details provided below. You also have the right to lodge a complaint in relation to this privacy notice or the Trustee's processing activities with the Information Commissioner's Office, you can do this via the ICO's website or telephone helpline.

The personal data we hold about you is used to administer your Scheme benefits and we may from time to time ask for further information from you for this purpose. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this may affect the payment of benefits from the Scheme. In some cases, it could mean the Trustee is unable to put your pension into payment or has 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 Trustee for further information using the contact details below.

Post: Hydro 1988 Pension Scheme, Buck (Edinburgh), PO Box 321, Mitcheldean, GL14 9BG.

Email: hydro@buck.com

Telephone: **+44 (0)330 123 0631**