

Pioneer GB Limited Pension and Life Assurance Scheme Fair Processing Notice

This notice is issued by the Trustee of the Pioneer GB Limited Pension and Life Assurance Scheme (the “**Scheme**”). Your privacy is important to us. We will process your personal data in accordance with applicable data protection law.

Who We Are

The data controller in respect of the personal data you submit to us, either directly or via Pioneer GB Limited or other participating employer, is the Trustee (“**we**”, “**us**”) of the Scheme. You may contact the Trustee by writing to: PAN Sole Trustees Limited, The Annex, Oathall House, 68-70 Oathall Road, Haywards Heath, West Sussex RH16 3EN. We use your personal data that is provided to us to administer and manage your pension and pay you, or any person in respect of you, the benefits provided by the Scheme.

Similarly, other parties involved in running the Scheme will sometimes need to make decisions about how your personal information will be used for those purposes. This includes the Scheme Actuary, currently Mark Roberts of Barnett Waddingham LLP. In legal terms, the Trustee and the Scheme Actuary are ‘data controllers’ in respect of this information. This Privacy Notice provides information on how the Trustee and the Scheme Actuary use your personal data.

Sources of Your Personal Data

We collect personal data from you directly, or from your employer.

We may also receive your personal data from other sources, such as HMRC or law enforcement agencies, or (if you are a beneficiary or potential beneficiary) from expression of wishes forms completed by a member of the Scheme. In connection with any request made by you of a pensions dashboard, we may also receive your personal data, in pseudonymised form, from a pensions dashboard or from the underlying systems operated by the Money and Pensions Service.

Types of Personal Data Collected By Us

The types of personal data which we process may include (but is not limited to):

- identity data, such as first name, last name, maiden name, marital status, age, date of birth, national insurance number, country of residence, marital status and gender;
- contact data, such as postal address, email address, telephone number;
- financial data, such as bank account details, past activity relating to the Scheme, employment history, remuneration information, information relating to your contributions or benefits under the Scheme, your status as a Scheme member (including joining and leaving dates), and information relating to your tax band;
- data relating to communication preferences.

We may also collect, store and use more sensitive types of personal data, known as ‘special categories’ of data. This includes data relating to your health, which may be processed by us in the case of ill-health early retirement, ill-health reviews and where incapacity or similar reasons determine the benefits paid out.

How We Process Your Personal Data

We process the personal data that you provide to us for the purpose of administering and managing your pension and paying you and/or your spouse and dependants' benefits. This may include use of your data for risk management purposes, and to undertake liability management and scheme de-risking exercises.

If you request pension information via a pensions dashboard, we are under a legal obligation to process and authenticate your request, and to make your pensions data available to you on that dashboard. In order to comply with this legal obligation, we are required to connect to the digital platform operated by the Pensions Dashboard Programme (a function of the Money and Pensions Service), and where a request for information is received, to share accurate, up-to-date information relating to your pension via that platform.

Our Lawful Basis for Processing

We therefore process your personal data on the legal basis that the processing is necessary:

- for the performance of the contract of employment between you and your employer regarding your participation in the Scheme,
- to comply with our legal obligations, and
- for our legitimate interests as the Trustee of the Scheme to effectively operate, administer and audit the Scheme; prevent fraud; keep our records up to date and any other legitimate interests that we may identify, provided always that your interests and fundamental rights do not override those interests.

We process special categories of data, namely your health data, to perform our obligations under employment law and the law relating to social protection. In addition, and in most cases, we shall request your explicit consent in order to process your health data. Where we do so, we process your data on the basis of that consent.

Please note that if you do not provide us with the personal data that we specify is required for administration of the Scheme then we may not be able to administer the benefits provided by it. Likewise, where we or third parties are processing your personal data on the basis of your consent, then you are entitled to withdraw your consent. If you do withdraw your consent, we may be unable to administer your pension, which may result in you and/or your spouse and dependants not receiving the pension and benefits provided by the Scheme.

We may process your personal data for a purpose other than that for which we originally collected it where the new purpose is compatible with the old purpose or we have your specific consent for the new purpose. If the new purpose is unrelated to the original purpose, then we will notify you in writing and explain the legal basis allowing us to continue processing your personal data.

With Whom We Share Your Personal Data

We will transfer your data to Pioneer GB Limited and their advisers, the Scheme's advisers, service providers and partner organisations to the extent that it is necessary for the management and administration of the benefits provided by the Scheme. Some of the Scheme's advisers, in particular the Scheme actuary, Scheme's legal adviser and the Scheme auditor will be data controllers in their own right in respect of the data we share with them. If you would like further details of those advisers and how they use your personal data, please contact the Trustee via the contact details provided in this document.

We may also disclose your information to third parties for the following purposes: (a) in order to operate, administer and audit the Scheme responsibly, (b) in the event that Pioneer GB Limited sells its business or assets (in which case we may disclose your personal data to the prospective buyer and/or its professional advisers), (c) in the event that we decide to de-risk or insure any of the benefits provided by the Scheme (in which case we may disclose your personal data to the prospective insurer, fund or other relevant third party) or (d) where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustee, the members of the Scheme, or others. We do not use your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.

In addition to the processing detailed above, we will also process, disclose or provide your information to the extent required by us according to the Pension Schemes Act 2021 and Pensions Dashboards Regulations 2022. This may involve the provision of information to a qualifying pensions dashboard service or to integrated service providers (ISPs). Your pensions information is shared with third parties to the extent that it is necessary to do so for us to comply with legal obligations to which we are subject, in this instance, in order for us to comply with the various obligations on us in relation to the pensions dashboard service.

Where Your Personal Data Is Processed

Your personal data may be processed outside of the UK and European Economic Area ("**EEA**") where required in order for us or Pioneer GB Limited to provide benefits to or in respect of you. In each instance, we will conduct a data protection test where necessary and ensure that the processing of your personal data outside the EEA is governed by appropriate safeguards, including relevant standard contractual clauses approved by (as applicable) the UK Government or European Commission.

Our Retention Of Your Personal Data

We will keep your personal data stored on our systems for as long as it takes to provide the pension and other benefits provided under the rules of the Scheme and for such period afterwards as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data. As a general rule, your personal data will be retained for as long as the Scheme up to continues and for up to 12 years following its winding-up.

In connection with the pensions dashboard programme, we generate pension identifier codes which link your request (to find or view your pension details) with a pension plan you have with us. These codes can be deleted by you if you delete your account with the relevant pensions dashboard. They will also automatically expire if your dashboard account remains inactive for five years (or other timescale determined by the Money and Pensions Service). We also retain on a long-term basis identifier codes which link multiple requests for the same information made by you via a pensions dashboard.

Automated Decision-Making Relating To You

Automated decision-making occurs when a decision is made about you based on your personal data, which has a legal or similarly significant effect on you, but which is made by an automated system and without meaningful human involvement. An example of this would be where we make a decision concerning the payment of pension benefits to you. We do not currently make any automated decision-making about you.

Your Rights

You have certain rights in relation to your personal data, although those rights will not necessarily apply in all cases or to all personal data that is processed by us. For example, certain rights will not apply where we need to process personal data to comply with our legal duties as Trustee. You have the right to request that we:

- provide you with a copy of any personal data that we hold about you;
- update any of your personal data that is out of date or incorrect;
- delete any personal data that we hold about you;
- restrict the way that we process your personal data;
- consider any valid objections that you have to our use of your personal data; or
- provide your personal data to a third-party provider of services.

Where we or third parties are required by law to obtain your consent to the processing of your personal data you are entitled to withdraw your consent. If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds.

With effect from 19 June 2026, you also have a right to submit a complaint to us concerning our processing of your personal data.

You can exercise your data protection rights, including your rights to access, restrict, object to the processing of, rectify and erase your personal data, or to submit a complaint, by contacting PAN Sole Trustees Limited, The Annex, Oathall House, 68-70 Oathall Road, Haywards Heath, West Sussex RH16 3EN, or via email at admin@pantrustees.co.uk. In order to safeguard your personal data, we may need to request further information from you to help confirm your identity and to ensure your right to access the relevant personal data and exercise your rights under this paragraph.

If you are unhappy with the way in which your personal data is being processed you have a right to lodge a complaint with the Information Commissioner's Office. You can report your concerns by telephoning their helpline on 0303 123 1113 or through their website at <https://ico.org.uk/concerns>.

The Scheme's independent Trustee

Please note, the Scheme's Independent Trustee (PAN Sole Trustees Limited ("PAN")) may continue to hold personal data collected through its role as the Trustee even when it is no longer the Trustee of the Scheme. Information about PAN's approach in this situation to data security as a firm can be found at <https://www.pantrustees.co.uk/Scheme-GDPR/>.

PAN Sole Trustees Limited

The Trustee of the Pioneer GB Pension and Life Assurance Scheme

March 2026