Edmund Nuttall Limited Staff Superannuation Fund (the 'Fund')

Privacy Notice

September 2026

2169/10/2026

PRIVACY NOTICE

EDMUND NUTTALL LIMITED STAFF SUPERANNUATION FUND

(the "Fund")

Edmund Nuttall Pension Trustees Limited, as trustee of the Fund (the "**Trustee**", "**we**", "**our**" or "**us**"), holds and processes personal data about Fund members, beneficiaries and potential beneficiaries in order to run the Fund. In doing so, we are a controller of the personal data and comply with relevant data protection legislation. This Privacy Notice provides information about our processing of your personal data and your rights.

What we do with your personal data

As a controller, we may collect and process your personal data provided by you or other third parties in certain cases, for example:

- from the information provided to us by you or your employer at the time you entered the Fund or subsequently;
- from a Fund member, where they have nominated you as a beneficiary;
- from the trustee of another pension scheme from which you have transferred;
- in certain circumstances, for example, if you lack the capacity to provide information to us yourself, from your family members, associates or representatives (including independent legal or financial advisers);
- when you interact with us during your time as a Fund member, for example, when you fill in a death benefit nomination form and provide this to us, or as a nominated beneficiary;
- From HM Revenue and Customs (HMRC), the Department for Work and Pensions (DWP), regulatory bodies and tracing organisations; and
- If you are a user of a pensions dashboard, we may send and receive information from the dashboard about you, to allow us to search for your pension.

If you provide us with personal data relating to others (for example, your nominated beneficiaries or dependants), we understand that you are authorised to provide that information to us, and that you have provided a copy of this privacy notice to such other individuals or otherwise made it available to them.

Categories of Personal Data

The personal data we may process about you includes:

- **contact and communications information**, including:
  - your contact details, including email address(es), telephone number(s) and postal address(es);
  - records of communications and interactions we have with you;
- **biographical information**, including:
  - your name, title, gender and current place(s) of residence;
  - your date of birth;
  - your marital or relationship status, where relevant, including any pension sharing orders in relation to divorce;
- **employment information**, including:
  - details of your employment, including details of pensionable service and employment history in regard to part-time working and career breaks;
- **financial information**, including:
  - your bank account details and PAYE tax code to process pension payments;
  - details of your pensionable salary;
  - National Insurance number and tax residence status;

    - other information relevant to the administration of your pension, including details of benefits and insurance details;
    - in respect of the use of pension dashboards:
        - your pension identifier (an online token that is used to identify you within the pensions dashboards ecosystem);
        - dates of Fund membership;
        - date of birth (to enable pensions dashboards to show the time to retirement);
        - information about how much pension you have built up already;
        - how much you may have when you retire; and
- **sensitive information**, which may include:
    - some special categories or "sensitive" data about certain individuals for the purposes of administering the Fund (for example in relation to ill-health or death benefits).

Legal basis for processing your personal data

We may collect and process your personal data:

a) for the purposes of **complying with our legal duties to administer the Fund or other legal obligations**, for example:

- to calculate and pay pensions, lump sum payments and related benefits under the rules applicable to the Fund;
- to trace you in order to administer the Fund and to ensure that Fund benefits are distributed correctly (and, for this purpose, if we lose touch with you over time, we may use publicly available information to ensure that our contact details for you are up to date, allowing us to continue to communicate with you about your membership of the Fund);
- to meet our compliance and regulatory reporting obligations, such as compliance with anti-money laundering laws and tax reporting requirements, as well as mandatory reporting obligations to competent authorities such as the Office for National Statistics (ONS) or The Pensions Regulator;
- to provide certain pensions-related information to you as required by law;
- in relation to pensions dashboard services; and/or
- in certain circumstances, for the prevention and detection of crime and/or in order to assist with investigations carried out by the police and other competent authorities such as HMRC or DWP.

b) in cases in which **processing is necessary for our or a third party's legitimate interests** in relation to the Fund, for example:

- to calculate and pay benefits under the rules applicable to the Fund and provide other pensions-related services to you and to communicate with you in relation to them;
- for our internal record-keeping requirements;
- for risk management purposes including to carry out actuarial valuations and to administer, monitor and evaluate the performance of the Fund's investments and to insure the Fund and its investments;
- to seek advice on our rights and obligations, such as where we require our own legal advice;
- in relation to pensions dashboard services;
- to run the Fund properly or to improve the way that the Fund is run (including, for example, in respect of benefit design, investment or sharing data in respect of any derisking exercise); and/or
- otherwise to further our objectives as set out in our Trust Deed.

c) in some cases, where this is **necessary for specific legitimate interests that are recognised in law**. These recognised legitimate interests are as follows:

- public task disclosure requests;
- national security, public security and defence;
- detecting, investigating and preventing crime; and/or
- safeguarding vulnerable individuals.

We also hold some special categories or "sensitive" data about individuals for the purposes of administering the Fund (for example, in relation to ill-health or death benefits). We must satisfy a specific condition under UK data protection laws (in addition to one or more of the lawful bases) in order to process this type of data. We will in most circumstances process this data as necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). If there are any occasions where we seek your explicit consent to process sensitive data, then you can withdraw it at any time.

We do not currently use your personal information to make significant decisions about you by solely automated means. We will let you know if this changes.

Who else processes your data?

We share your personal data with certain third parties involved in running the Fund or the provision of information on your pension benefits, for example:

- Gallagher, the Fund Administrator;
- Mercer, as former Fund Administrator;
- Paul Butfield, as Fund Actuary;
- BAM Nuttall Limited, as the Fund's sponsoring employer and their corporate group;
- our professional advisers, including our actuarial advisers, legal advisers (CMS), auditors, benefit consultants and other service providers (including insurance companies and financial services institutions, the Fund's additional voluntary contribution (AVC) facility provider investment manager and investment consultants);
- the ONS, The Pensions Regulator, HMRC, DWP and other relevant entities (including a court, government body, law enforcement agency or other authority of competent jurisdiction) when we are legally required to do so;
- annuity providers, group life insurers and their counterparties (including reinsurers);
- third parties in relation to the provision of pensions dashboard services (for example, the Money and Pensions Service and its service providers and our Integrated Service Provider who helps us to connect the Fund to pensions dashboards);
- our suppliers; and
- any other persons who become involved in or responsible for providing or communicating benefits or advising us.

International data transfers

We, BAM Nuttall Limited, Gallagher, our suppliers and other advisers may from time to time transfer personal data outside of the UK. Under UK data protection laws, we can only transfer your personal data to another entity in a jurisdiction outside of the UK if:

- the UK government has decided that the particular jurisdiction (or international organisation) ensures an adequate level of protection of personal data (by issuing 'adequacy regulations'). A list of jurisdictions for which the UK currently has adequacy regulations in place is available here. This includes all countries in the EEA. We rely on adequacy regulations for transfers of personal data to our providers and suppliers that are based in these countries;

- in cases where there are no applicable adequacy regulations, where there are 'appropriate safeguards' in place, such as standard data protection clauses (specified in regulations made by the UK government, or in a document issued by the UK data protection authority) and provided that the level of protection for your personal data following the transfer based on these safeguards will not be materially lower than in the UK; or
- a specific exception (known as a derogation) applies under relevant data protection laws in the circumstances. However, we do not routinely rely on derogations in respect of overseas transfers of personal data.

Storage of your personal data

We retain your personal data for so long as necessary in order to administer the Fund. Pension benefits are paid over a long period and your right to benefits under the Fund is based on information which may go back many years. The Trustee's policy is therefore to retain information relating to you until your membership of the Fund ends.

Once your membership of the Fund ends, the Trustee may decide to delete some of the data held in relation to you after 7 years or earlier, if requested by you. However, information will be held for longer where we consider such processing continues to be necessary in respect of the administration of the Fund, for example, to ensure that you receive the correct benefits and to deal with any queries relating to your benefits which may arise after the period mentioned above.

Gallagher will hold on to your personal data for 7 years after the termination of the Fund or, if earlier, 7 years after the termination of the contract with us (or such lesser period permitted by law) or such longer period required by law.

Your rights

You have a number of legal rights (subject to certain conditions and exceptions) in relation to the personal data that we hold about you. These rights include:

- **The right to be informed:** You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This notice is an example of this right.
- **The right of access:** You have the right to obtain a copy of personal data relating to you (and other information) from us where we are processing it. This is so you are aware and can check that we are using your information in accordance with data protection law.
- **The right to rectification:** You have the right to have your information corrected if it is inaccurate or incomplete. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.
- **The right to erasure:** You have the right to request the deletion or removal of your personal data where there is no compelling reason for us to keep using it.
- **The right to restrict processing:** You have the right to restrict or suppress further use of your personal data that we process. This means that it can only be used for certain processing, such as in relation to legal claims or to exercise legal rights.
- **The right to data portability:** You have the right to receive your personal data in a structured, commonly used and machine-readable format and to request that this data is transmitted to another party/controller where this is technically feasible.
- **The right to object to processing:** You have the right to object to our processing of your personal data.

- **The right to lodge a complaint:** You have the right to lodge a complaint about our handling or processing of your personal data. (See below for further details).
- **The right to withdraw consent:** In any specific circumstances in which you have given your consent to us for the processing of any personal data, you have the right to withdraw such consent at any time (although this does not mean that any processing of personal data carried out by us with your consent up to that point is unlawful). Please note that, if we are unable to undertake certain processing necessary to administer your benefits, this may affect the provision of the pension benefits.

If you would like to exercise any of the rights mentioned above, please contact us using the contact details below.

Contact details

To exercise your rights or to contact us with any questions regarding the processing of your personal data, please contact us:

BAM Nuttall Ltd
Second Floor, Block A Spectrum Point
279 Farnborough Road
Farnborough
Hampshire
GU14 7LS

Email: rebecca.frewin@bam.com
Tel: +44 (0) 7557 179 063

What if you have a complaint?

You have the right to complain to the Trustee about our processing of your personal data, if you consider that we have breached the UK GDPR. To make a complaint about how we've handled your information, contact us as set out above. We will acknowledge the complaint within 30 days and investigate the complaint in accordance with our legal obligations.

If you're not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the UK data protection regulator (currently the Information Commissioner's Office). Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113

Website: https://ico.org.uk/make-a-complaint/

Changes to this privacy notice

We reserve the right to modify and/or update this privacy notice at any time and will make available a copy in the case of substantive changes.

This privacy notice was last updated September 2026