PRIVACY NOTICE FOR THE E.H. BOOTH & CO. PENSION & ASSURANCE SCHEME

The Trustees of the E.H. Booth & Co. Pension & Assurance Scheme (the Scheme") hold and process personal data about our members and their beneficiaries in order to run the Scheme. In doing so, we comply with the Data Protection Act 2018, Data (Use and Access) Act 2025 and other relevant UK legislation. The Trustees are data controllers, as is the Scheme Actuary, and this notice is issued on behalf of both the Trustees and the Scheme Actuary.

We describe in this Notice the personal data which we collect about you and other individuals (for example, your spouse or beneficiaries), what your personal data is used for, and what your rights are.

What is your personal data used for?

The Trustees collect and process your personal data for the purposes of complying with their legal duties to administer the Scheme and for other legitimate purposes in relation to the ongoing operation and management of the Scheme. This includes:

- Communicating with members in relation to their benefits, responding to requests and queries;
- General administration of the Scheme, including calculating, recording and paying benefits;
- Meeting the Trustees' ongoing regulatory, legal and compliance obligations;
- Risk management purposes such as longevity modelling, managing Scheme assets, insurance solutions, member option exercises (including pension increase exchange and transfer value exercises);
- Improving our processes and use of technology, including testing and upgrading of systems.
- In connection with the sale, merger or corporate re-organisation of the employer that sponsors the Scheme.

The Scheme Actuary, Laura Taylor of Isio Group Ltd, processes your personal data to undertake various tasks, primarily around scheme funding.

What personal data do we hold?

We may collect, use or otherwise process the following types of personal data about you and, in some circumstances, your spouse, civil partner, partner or dependant:

- name, gender, address, date of birth, NI number, contact details;
- bank account details and tax information in relation to your pension benefits;
- information about your membership of the Scheme (for example service dates and benefit amounts);
- information about any other pension arrangements you have.
- 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.

The Trustees may also hold some special categories of personal data for the purposes of administering the Scheme, for example in relation to ill-health or death benefits.

We will only hold this data where it is necessary for us to do so in order to properly perform our duties as Trustees. Should legislation require us to obtain your explicit consent to continue to do this, we will seek your consent at the appropriate time.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided the Company, and other organisations, such as HMRC, DWP, other pension schemes, regulatory bodies and tracing organisations.

We also receive information from members about their beneficiaries, who may be eligible to receive benefits on the member's death.

Where you have provided us with personal data about other individuals, such as family members, dependents or potential beneficiaries under the Scheme, please ensure that those individuals are aware of this information contained in this notice.

Who do we share your information with?

To comply with our legal duties and for the purposes of Scheme administration, the Trustees may share your information with:

- The Scheme's administrator (currently Isio Group Ltd) who process information to run the Scheme;
- The Scheme's professional advisors, including the Scheme Actuary, auditor, legal advisor, and any other financial advisor or other organisation appointed to advise you in regard to your options under the Scheme;
- The Scheme's insurers and annuity providers, investment managers, banks or other service providers;
- The Company and their professional advisors;
- Statutory and regulatory bodies, including but not limited to HMRC, DWP and tracing organisations;
- Pensions Dashboard providers
- Any other person who is authorised to act on your behalf.

What is our lawful basis for processing your personal data?

Under data protection legislation, we need to have a lawful basis each time we use, share or otherwise process your personal data.

The Trustees have certain duties and powers which are conferred on it by law or by the Scheme's Trust Deed and Rules. In most cases, the processing of your personal data is necessary so that the Trustees can perform those duties and exercise those powers (for example, to pay your benefits).

Certain uses of your personal data, or other processing activities, may not be strictly necessary for the Trustees to perform their legal duties and regulatory responsibilities, or to exercise its powers. However, it may be that certain uses of your personal data are necessary for the purposes of the Trustees' legitimate interests.

When we say "legitimate interests", we mean the Trustees' interests in operating the Scheme as properly, efficiently and securely as possible. For example, to manage matters associated with the provision of your benefits under the Scheme, including offering you choices as to the form or timing of those benefits.

The Scheme Actuary is appointed under pensions legislation and will use your personal data to undertake various tasks, primarily around scheme funding.

Where we obtain information containing "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 Trustees in writing. However, if you do not give consent, or subsequently withdraw it, the Trustees may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years.

Our policy is therefore to retain personal data about our members and their beneficiaries until after their membership of the Scheme ends, and for such longer period as is necessary to enable us to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

The data collected from you will usually be stored within the UK or European Economic Area (EEA) except in circumstances where it may be required to transfer that data out with these areas, for example if you live or work somewhere other than the UK or EEA, or if the Scheme's service providers host data elsewhere.

Any transfers of data will be governed by Data protection Laws and all reasonable steps will be taken to ensure that your data is handled safely and in accordance with this privacy notice.

Your rights

You have the right to request a copy of your personal data, require that we rectify any errors in the data that we hold, and request that we erase your personal data.

In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere.

If you wish to exercise any of these rights, please contact us using the details provided later.

If in the future we request and obtain your consent, you may withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

Contact details

If you have any questions about this Notice or would like to exercise your rights in respect of your data, please contact us using the following contact details:

Trustee contact:

David Benson
Booth Central Office
Longridge Road
Ribbleton
Preston
PR2 5BX
Email: dbenson@booths.co.uk
Phone: 07966187374

Scheme administrator:

Isio Group Limited
PO Box 163
Blyth
NE24 9GS
Email: ukfmbpensions@isio.com
Website: www.yourisio.com
Phone: 03301359681

Trustees Data Complaints process

Under the provisions of the Data (Use and Access) Act 2025 (DUAA) members have the right to complain directly to the Data Controller in the event of a data breach or concern in relation to the processing of personal data.

As the Trustees are the Data Controller of member personal data, complaints relating to Data Protection should be addressed to the Trustees in the first instance.

Complaints or concerns

If you are not happy in any way with how we have processed or handled your personal information, you have the right to complain directly to us. This includes concerns about how your personal data has been collected, used, stored, shared, kept accurate, or protected.

You may raise a data protection complaint with us by writing to the Trustees (see the Trustees contact details above. You do not need to use specific wording or refer to legislation when making your complaint. If it is clear that your concern relates to how we have handled your personal data, we will treat it as a data protection complaint.

Once we receive your data protection complaint, we will acknowledge receipt of your complaint within 30 days of receiving it.

After acknowledging your complaint, we will take appropriate steps to respond without undue delay. This includes making appropriate enquiries to understand the issues raised, reviewing relevant information, and keeping you informed about the progress of your complaint while it is being considered.

Once we have completed our consideration of your complaint, we will inform you of the outcome without undue delay. Our response will explain the outcome of our assessment and any steps we have taken or propose to take as a result.

Not satisfied with your complaint

If you are not satisfied with how we have handled your data protection complaint, you have the right to raise your concerns with the Information Commission (ICO). The ICO is the UK's independent body set up to uphold information rights. The ICO generally expects individuals to raise their complaint with us first before contacting the ICO.

You can contact the ICO at the address below:

Information Commission

Wycliffe House, Water Lane, Cheshire, SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use the national rate number.

You can also contact the ICO and find out more about them via their website: https://ico.org.uk/

Changes to this privacy notice

The data controllers may change this Notice from time to time and we will notify you of any changes the next time we communicate with you, such as in the Summary Funding Statements that are issued on a regular basis.