

The Morgan Group Senior Staff Pension and Life Assurance Scheme

Personal information and what we do with it

Dear member,

As Trustee of the Scheme, we need personal information about you to run the Scheme and pay benefits. Because we are, in legal terms, a 'data controller' in respect of this information, we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

What personal information we have

We hold some or all of the following types of personal information about you:

- Your name, date of birth, national insurance number and bank account information.
- Contact details (including your address, phone number and, if you have supplied this, your email address).
- If your benefits from the Scheme derive from your employment, details of your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information we might need to pay any death benefits due in relation to you.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.

We may sometimes use other information about you. This could include information about your health where it is relevant for instance, for medical underwriting purposes in respect of your death benefits or to enable the Trustee to determine whether you qualify for an ill-health early retirement pension. Details about personal relationships, to determine who should receive benefits on your death, might also be retained. We might also, very rarely, have information about criminal convictions and offences where it is relevant to your entitlements under the Scheme.

Where we get personal information from

Some of the information we have comes directly from you. We may also get information (such as your salary and length of service) directly from your employer. In addition, Hymans Robertson, who administer the Scheme on our behalf, may have obtained information from you and passed it to us.

Sometimes we get information from other sources: for example, another scheme if you have transferred benefits from that scheme; government departments such as HMRC and DWP; and publicly accessible sources (e.g. the electoral roll) if we have lost touch with you and we are trying to find you.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Our legal basis for using your personal information, including how we share it

The Trustee must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to the running of the Scheme.

We will use your personal information to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud. We may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

We also have a legitimate interest in properly administering the Scheme. This includes: paying benefits as they fall due; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance).

To achieve this, we may share your personal information with various people, including: any new trustees; employers; the Scheme administrator; the Scheme actuary; our professional advisers; auditors; insurers; HMRC; and the Pensions Ombudsman. If your benefits are transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

When we need to use information about your health (or other very personal information), we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use this information without consent, and we will do so where that is necessary for us to run the Scheme in a sensible way. You can withdraw your consent at any time by contacting the Trustee, c/o Inside Pensions, using the contact details at the end of this announcement. This may affect what we can do for you, unless we have another lawful reason for using your information.

We may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Scheme.

How to contact the other people we give your personal information to

Some of the people we mention above just use your personal information in the way we tell them. However, others may make their own decisions about the way they use this information to perform their services or functions, or to comply with regulatory responsibilities as controllers in their own right. In this case, they are subject to the same legal obligations as us in relation to this information, and the rights you have in relation to your information apply to them too.

If you want any more information from the Scheme Administrator or any service provider, or to exercise any rights in relation to the information they hold, please contact us and we will put you in touch with them.

How long we keep your personal information for

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Scheme and pay any benefits due to or in respect of you.

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, most of the personal information that we hold will be kept until the Scheme is wound-up.

However, some information may be kept for a shorter period depending on how long we sensibly think we need it to deal with queries (from you or your beneficiaries/other persons who might ask us if they are entitled to payments), complaints (from you or them), and our legal obligations mentioned above.

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;

- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant.

Both the Trustee and our Administrator's contact details for exercising these rights are set out below and further information about these rights is available on request.

Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for personal information, but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Queries and further information

If you want more information about what we do with your information and what your rights are, the Trustee can be contacted at:

The Trustee of the Morgan Pension Scheme
c/o Barnett Waddingham
67 Albion Street,
Leeds
LS1 5AA

Email: MPSandMSS@Barnett-Waddingham.co.uk
Telephone: 0333 1111 222

Our Scheme administrator can be contacted at:
Hymans Robertson LLP
45 Church Street
Birmingham
B3 2RT

Email: morgan@hymans.co.uk
Telephone: 0121 210 4375

If you have concerns about the way we handle your personal data, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.

For and on behalf of the Trustee of the Morgan Group Senior Staff Pension and Life Assurance Scheme

Date: November 2021