

## Privacy notice

### 1 Introduction

- 1.1 The Trustees of the Airsprung Retirement and Death Benefits Plan, (referred to in this notice as **we, us, our** or the **Trustees**) need to use your personal data to administer your pension under the Airsprung Retirement and Death Benefits Plan (the **Plan**). This Privacy Notice explains how we use your information, the legal basis which allows us to use your information, how we share your information and your rights in relation to your information.
- 1.2 The table the end of this notice provides an overview of the personal data that we collect, the purposes for which we use that data, the legal basis which permits us to use it and the rights that you have in relation to your personal data.
- 1.3 We review this privacy notice regularly, so if there are any changes to the way in which your personal data is used this notice will be updated and we will notify you of the changes.

### 2 What is personal data?

- 2.1 Personal data is information that tells you something about a living individual. This could include name, contact details and pension entitlement information.

### 3 How do we collect personal data?

- 3.1 We collect information from you directly when you join the Plan and we also collect it when you contact us by phone, text, letter or email or when your employer contacts us.

### 4 What personal data do we collect?

- 4.1 We collect the following types of personal data:
  - 4.1.1 your name, date of birth, email address, postal address, telephone or mobile number;
  - 4.1.2 your gender;
  - 4.1.3 information about your physical or mental health (where it is required for the purposes of the Plan);
  - 4.1.4 identity documentation such as your national insurance number or passport number;
  - 4.1.5 information about your personal circumstances, such as your family life and details of dependants;
  - 4.1.6 employment details such as pensionable pay, length of service, employment history, job title and job responsibilities, financial details such as income and salary; and
  - 4.1.7 bank account details to process pension payments.

### 5 For what purposes do we use your personal data?

- 5.1 We use your personal data for the following purposes:
  - 5.1.1 to administer the Plan, including to calculate and pay pension payments;
  - 5.1.2 to carry out our obligations under any agreement that we have with you;

- 5.1.3 to respond to any queries that you raise or other correspondence that you send to us;
- 5.1.4 to notify you about our services and changes to our services;
- 5.1.5 for trend analysis purposes to enable us to improve our services;
- 5.1.6 to prevent and detect fraud;
- 5.1.7 to analyse the liabilities of the Plan and to help us ensure that the Plan is run properly and effectively;
- 5.1.8 for risk analysis and risk management purposes;
- 5.1.9 to comply with our legal obligations and professional codes;
- 5.1.10 to comply with information requests that we receive from regulators and law enforcement authorities or to comply with court orders;
- 5.1.11 in connection with any sale, merger, acquisition, disposal, reorganisation, restructuring or similar change to our organisation; and
- 5.1.12 to obtain quotes from insurers in respect of a proposed buy-in or buy-out.

## **6 Automated decision making**

- 6.1 We do not take automated decisions about you using your personal data or use profiling in relation to you.

## **7 What is the legal basis of our data processing?**

- 7.1 We rely on the following conditions to enable us to process your personal data:
  - 7.1.1 Where we need to comply with a legal obligation;
  - 7.1.2 it is in ours or a third party's legitimate interests to process your personal data and your interests and fundamental rights do not override those interests. In some cases we will need your explicit consent to obtain and use your personal data. When this is the case, we will ask for your consent at the time when we collect the information and we will explain why we need the information at the time when we ask for your consent. If we are relying on consent, you can withdraw your consent to our processing of your personal data at any time by contacting us using the contact details below.
- 7.2 The **Table** at the end of this notice provides more detail about the personal data that we use, the legal basis that we rely on in each case and your rights.

## **8 For how long do we keep your personal data?**

- 8.1 We keep your personal data for as long as is necessary to enable us to administer the Plan and for a period after the winding up of the Plan to enable us to defend any claims that may be brought about payments made or due under the Plan or claims about the running of the Plan.

## **9 What happens if you do not provide the personal data that we request?**

- 9.1 We need some of your personal data in order to perform our legal obligations to you. For example, we need to know your bank details so that we can process your pension payments. We also need some personal data so that we can comply with our legal obligations. For example, we need proof of your identity such as national insurance number or passport to comply with our anti-money laundering obligations.

9.2 Where personal data is needed for these purposes if you do not provide it we will not be able to perform legal obligations to you and may not be able to administer the Plan effectively. We explain when this is the case at the point where we collect personal data from you.

## **10 How do we share your personal data?**

10.1 We will keep your personal data confidential and only share it with others for the purposes set out below and elsewhere in this privacy notice.

10.2 We share your information in the following ways:

10.2.1 we share your personal data with the Plan's administrator, the Airsprung Group PLC as the principal employer and members of its group of companies and the counterparties to the Plan's investments for the purposes of administering the Plan;

10.2.2 we share your personal data with our service providers, professional advisers and auditors when they need to have access to your personal data in order to advise us or provide services to us;

10.2.3 we share personal data with our regulators and law enforcement authorities and with courts, tribunals and arbitrators;

10.2.4 we may share personal data with insurers where we need to do so in order to obtain quotes or to put in place arrangements for a buy-in or buy-out policy. This is likely to include information relating to gender, date of birth, post codes, date of retirement, dependants, dates of joining/leaving the Plan, pension payments and spouse contingent pension liabilities. This information needs to be shared to enable insurers to provide quotes and to put in place insurance policies for the Plan;

10.2.5 we may share personal data in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of our business.

10.3 Where we share personal data with third parties we ensure that we have appropriate measures in place to safeguard your personal data and to ensure that it is solely used for legitimate purposes in line with this privacy notice.

## **11 Overseas transfers of your personal data**

11.1 When personal data is transferred to countries outside of the UK and the European Economic Area those countries may not offer an equivalent level of protection for personal data to the laws in the UK. Where this is the case we will ensure that appropriate safeguards are put in place to protect your personal data.

11.2 We do not currently transfer personal data to any countries outside of the UK and the European Economic Area. Should this position change in the future then this Privacy Notice shall be updated accordingly.

## **12 Your rights in relation to your personal data**

12.1 You have a number of rights in relation to your personal data, these include the right to:

12.1.1 request that your personal data is corrected if you believe it is incorrect or inaccurate; and

12.1.2 obtain a copy of your personal data that we hold.

12.2 In addition, from 25 May 2018 you have the following rights:

12.2.1 a right to ask us to restrict our data processing activities where you consider that: data is inaccurate; our processing of your personal data is

unlawful; where we no longer need the personal data but you require us to keep it to enable you to establish, exercise or defend a legal claim; or where you have raised an objection to our use of your personal data;

- 12.2.2 a right to ask us to erase your personal data: where we no longer need the personal data; if we are relying on consent to process your personal data and you withdraw your consent; where you object to processing that we are carrying out on the basis of our legitimate interests and we do not have any overriding ground which permits us to continue processing your personal data; if we have processed your personal data unlawfully; or if personal data must be erased to comply with a legal obligation;
- 12.2.3 a right to object to our processing of your personal data where we are relying on legitimate interests to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal data; and
- 12.2.4 a right to request a copy of certain personal data that you have provided to us in a commonly used electronic format. This right relates to personal data that you have provided to us that we need in order to perform our agreement with you and personal data where we are relying on consent to process your data.

12.3 If you would like to exercise any of your rights or find out more, please contact us using the details below.

### **13 Complaints**

13.1 If you have any complaints about the way we use your personal information please contact John Newman, chairman of Trustees (contact details below) who will try to resolve the issue. If we cannot resolve any issue, you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK). If you need more information about how to contact your local data protection authority please contact John Newman.

### **14 Contact details**

If you have any questions, comments or requests regarding any aspect of this Privacy Notice, please do not hesitate to write to us at:

Mr Bob Hymas  
c/o Airsprung Group PLC  
Canal Road  
Trowbridge  
Wilts  
BA14 8RQ

**Table: quick check of how we use your personal data**

<b>Purpose</b>	<b>Personal data used</b>	<b>Legal basis</b>	<b>Which rights apply?*</b>
<b>To pay your pension and administer the Plan</b>	Member's personal details including bank details, DOB, postal address and national insurance	Legal obligation and legitimate interest	The generally applicable rights plus the right to data portability.
<b>Anti-money laundering</b>	Member identification details including postal address and DOB	Legal obligation	The generally applicable rights.

\*The following generally applicable rights always apply: right to be informed, right of access, right to rectification, right to erasure, right to restriction and rights in relation to automated decision making. For more detail about your rights and how to exercise them please see "Your rights in relation to your personal data" section above.