PRIVACY NOTICE

For W. & J. Leigh Staff Pension Scheme (the "Scheme")

This privacy notice is for members and beneficiaries of the Scheme ("**you**") from W. & J. Leigh Trustees Limited, the Trustee of the Scheme ("**Trustee**" and "**we**").

Why we are providing this notice to you

As the Trustee of the Scheme, we, as a data controller, will hold and process information about you (which we refer to as "personal data") in connection with the Scheme. We are required by law to tell you about the personal data we hold and process about you, how it is used, and what we do to protect it. This notice sets out that required information.

The personal data being processed, the purpose of processing and the legal basis for processing your personal data

The personal information being processed	The purpose for processing the personal information	The legal basis for processing the personal information
Personal details such as name, title, gender, date of birth, telephone number, address and postcode, email address, and identifiers such as National Insurance Number, government identification, tax file number, pension or member reference number and employee number (where applicable) (**Identification Information**)	We may collect and process this information: ▪ to administer and manage the Scheme, including to assess eligibility for benefits, calculate and pay benefits due under the Scheme, to contact you, to respond to queries from you and others that may receive benefits as a consequence of your membership; ▪ for financial modelling and accounting purposes; ▪ to maintain the Scheme's records; ▪ to assist in the investment of the Scheme's assets; ▪ to comply with legal or regulatory requirements, including disputes and litigation; ▪ to facilitate any proposed wind-up of the Scheme or the withdrawal or admission of a participating employer to the Scheme; ▪ in connection with corporate activity, i.e. the sale, merger, reorganisation etc. of a participating employer in the Scheme; ▪ for risk management purposes, including crime and fraud detection and prevention, the buy-out or insuring of benefits or risks; ▪ to comply with audits, including audits of the Scheme accounts and our internal controls.	Necessary to our legitimate interests in administering and managing the Scheme. Necessary to comply with our legal and regulatory obligations.
Details of family circumstances, including marriage, civil partnership, and relationship details as well as family and	We may collect and process this information: ▪ to administer and manage the Scheme, including to assess eligibility for benefits, calculate and pay	Necessary to our legitimate interests in administering and managing the Scheme.

dependant's information (**Family Information**)	benefits due under the Scheme, to contact you, to respond to queries from you and others that may receive benefits as a consequence of your membership; ▪ to maintain the Scheme's records; ▪ to comply with legal or regulatory requirements, including disputes and litigation.	Necessary to comply with our legal and regulatory obligations.
Employment details relating to the period you were an active member of the Scheme, such as earnings, length of service, employment and career history, recruitment and termination details, absence record and job title (**Employment Information)**	We may collect and process this information: ▪ to administer and manage the Scheme, including to assess eligibility for benefits, calculate and pay benefits due under the Scheme, to contact you, to respond to queries from you and others that may receive benefits as a consequence of your membership; ▪ to maintain the Scheme's records; ▪ to comply with legal or regulatory requirements, including disputes and litigation.	Necessary to our legitimate interests in administering and managing the Scheme. Necessary to comply with our legal and regulatory obligations.
Financial details such as bank account information, any other income and other pension arrangements (**Financial Information)**	We may collect and process this information: ▪ to administer and manage the Scheme, including to assess eligibility for benefits, calculate and pay benefits due under the Scheme, to contact you, to respond to queries from you and others that may receive benefits as a consequence of your membership; ▪ for financial modelling and accounting purposes; ▪ to maintain the Scheme's records. ▪ to comply with legal or regulatory requirements, including disputes and litigation.	Necessary to our legitimate interests in administering and managing the Scheme. Necessary to comply with our legal and regulatory obligations.
Any additional information you provide in the course of your dealings with us (**Additional Information**)	We may collect and process this information to: ▪ to administer and manage the Scheme, including to assess eligibility for benefits, calculate and pay benefits due under the Scheme, to contact you, to respond to queries from you and others that may receive benefits as a consequence of your membership.	Necessary to our legitimate interests in administering and managing the Scheme.
Information about health, including any medical condition, health and sickness records (if relevant) (**Health Information**)	We may collect and process this information to process any claims for certain health related benefits, for example ill health or incapacity benefits.	Necessary to our legitimate interests in administering and managing the Scheme. To the extent that such personal information is "special category data", for example: health data,

		data relating to racial or ethical origin, religious or philosophical belief, we will ask for your consent to process such information unless there is an alternative legal basis for us processing this information

Where does the Trustee get the data from?

We collect personal data from the following sources:

- forms completed by you or someone authorised on your behalf;
- current or previous participating employer in the Scheme;
- current or previous service providers / advisers to the Scheme;
- information provided during a meeting or by post, email or telephone;
- certain government departments or agencies, e.g. Department for Work and Pensions, HM Revenue & Customs and the Pensions Ombudsman.

If you have provided the Trustee with personal data about family members, dependants or other people who may become eligible to obtain benefits under the Scheme, we ask you to let such people know that you have done so.

Who the Trustee may share your personal data with

The personal information	The recipient of the personal information	The reason for sharing the personal information	The lawful basis for sharing the personal information
Identification Information, Family Information, Employment Information, Financial Information, Additional Information, Health Information	▪ entities providing administration services, including tracing, banking and payment services; ▪ the administrator; ▪ the actuary and actuarial advisors; ▪ investment advisers or managers; ▪ participating employers of the Scheme and their professional advisers; ▪ your financial adviser or any other person authorised to act on your behalf; ▪ insurers, annuity providers or buy-out providers.	To administer and manage the Scheme, including, calculate, secure and pay benefits.	Necessary to our legitimate interests in administering and managing the Scheme.
Identification Information, Family Information, Employment Information, Financial Information, Additional information	▪ the Scheme's legal advisers and auditors; ▪ regulators, authorities, and governmental bodies or agencies, e.g. Department for Work and Pensions and HM Revenue & Customs; ▪ any relevant ombudsman, dispute resolution body, judicial body, court or law enforcement agency.	Where we need to take steps to defend ourselves in respect of a legal claim or to comply with our legal obligations.	Necessary to comply with our legal and regulatory obligations. Necessary to defend legal claims made against us

Data Transfers outside the UK

Your personal data is stored in the UK. Personal data may be transferred to a recipient based in a country outside of the UK in limited circumstances. Some of these countries may not have data protection laws that are similar to those in the UK and may not be regarded by the UK Government as providing an adequate level of data protection. In the event we or our permitted third parties transfer personal data outside the UK, we will ensure that such transfer is subject to appropriate safeguards in accordance with the applicable data protection laws, including the UK Information Commissioner's Office's International Data Transfer Agreement.

How long does the Trustee keep your personal data?

We will only keep your personal data for as long as it is required for the purposes for which it was collected, such as to enable us to administer the Scheme properly, or as required to comply with applicable law or to defend or enforce our legal rights. This means that we may need to retain certain data after you have received all the benefits due to you under the Scheme so that we can deal with any questions that may arise in the future concerning the proper administration of the Scheme. After this, we will securely destroy any personal data held in accordance with our data retention policy.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Right to withdraw consent

If you have given your consent for the Trustee to process special category data, such as health information, you have the right to withdraw your consent at any time by writing to the Trustee using the contact details below. However, if you do withdraw your consent or do not give your consent to the Trustee to process such data, it may make it more difficult for the Trustee to determine if certain benefits are payable.

Automated processing

We do not carry out automated decision-making or profiling.

Your rights

Under data protection laws you have a number of rights available, namely the right to:

- access your personal data;
- correct incomplete/ inaccurate data;
- erase the personal data we hold about you;
- restrict how we handle your personal data;
- transfer your personal data to a third party; and
- object to how we process your personal data.

However, please note that some of these rights may not always apply, as there are sometimes requirements and exemptions which may mean we need to keep processing the personal data or not disclose it, or other times when

the rights may not apply at all. If you wish to exercise any of these rights, please contact us using the contact details below.

Complaints procedure

You have the right to make a complaint to us if you consider that we have infringed data protection legislation when handling your personal data. The complaint form can be accessed by contacting the Scheme's administrator, Isio:

- By email: leighpensions@isio.com
- By letter: W. & J. Leigh Staff Pension Scheme, C/O Isio Group, PO Box 163, BLYTH, NE24 9GS

You also have the right to complain to the regulator. In the UK, the relevant regulator is the Information Commission (the **IC**), and you can make your complaint via the IC's website here: https://ico.org.uk/make-a-complaint/data-protection-complaints/

Contacting the Trustee

If you have any questions about this Privacy Notice or how we handle your personal data, or if you would like to make a complaint or exercise your rights, please contact our third party administrators in the first instance at W&J Leigh Staff Pension Scheme, C/O Isio Group, PO Box 163, BLYTH, NE24 9GS.

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

October 2026