

Ibstock Pension Scheme ('the Scheme') Fair Processing Notice

The Trustees hold and process personal data about you and (if applicable) your spouse and dependants. This data is held to be able to operate the Scheme and administer your benefits in it. This means that the Trustees are a 'data controller' under data protection legislation, and have to inform you of certain information, which is set out in this notice.

What data do we hold?

The data the Trustees hold is the information necessary to administer your benefits and this includes your name, gender, date of birth, NI number, address, marital status, salary information and (where your pension is in payment) bank details. In certain circumstances the Trustees may also seek your consent to process more sensitive personal data about you, for example medical information if you wish to take your benefits under the Scheme early due to ill health.

The Trustees collect this information in a variety of ways. Some data is obtained either directly from you, your spouse or dependants, for example via forms or other correspondence. The Trustees may also collect some data from your employer, HMRC or (if the Trustees do not have up-to-date contact details for you and are trying to locate you to arrange payment of your benefits) from a tracing agent.

How we use your data

Your data is held by Gallagher (Administration & Investment) Limited ('**Gallagher**'), which is responsible for administering the Scheme on behalf of the Trustees. Additionally, in order to operate the Scheme and administer your benefits, the Trustees may need to disclose your data to other people, such as:

- the Scheme Actuary and the Trustees' other professional advisers;
- third parties you have authorised us to share information with (such as your nominated representatives or financial advisers);
- third parties who assist in administering the Scheme (such as tracing agents, banks, IT providers and payroll providers);
- companies in the Ibstock group (including your employer);
- public authorities, regulators and other government bodies, such as HMRC and the Pensions Ombudsman; and
- insurance companies, to arrange particular entitlements, for instance life insurance or an annuity policy where relevant.

In August 2020, the Trustees invested approximately half of the Scheme's assets by purchasing a bulk annuity policy with Just Retirement Limited ('**JUST**'). Subsequently, in December 2022, the Trustees invested the Scheme's remaining assets (not used to purchase the policy in 2020) to purchase further bulk annuity policies with JUST. These investments required the Trustees to share certain information about all members and their

dependants with JUST in order to be able to purchase the policies. Further details about how JUST will hold and maintain your data can be found at <https://www.wearejust.co.uk/globalassets/defined-benefits/documents/db-jrl-privacy-notice.pdf>.

Scheme Actuary

The Scheme Actuary uses your data to advise the Trustees on the financial management of the Scheme. The Scheme Actuary is different from the other recipients of personal data because, when carrying out his role, he can be involved in determining the purposes and manner for which any personal data is processed. This means in some circumstances he may be a joint 'data controller' with the Trustees, whereas other recipients are 'data processors' (or 'data controllers' in their own right). The responsibilities of data controllers and data processors under data protection legislation are different. Please note that except in very limited circumstances (for example where required by overriding law or actuarial regulations) the Scheme Actuary will only process your data in accordance with the Trustees' instructions.

What legal basis do we have for processing your data?

For the most part, it is necessary for the Trustees (and the Scheme Actuary) to hold and process your data to comply with the legal obligations they are subject to and in order for them to comply with their obligations under the trust deed and rules governing the Scheme and/or overriding legislation.

There may be cases where the Trustees may have a legitimate interest in processing your personal data, for example in sending you information relating to pension scams and options relating to your benefits in the Scheme. Where we rely on this legal basis to use your personal information, we will take appropriate steps to ensure the processing does not infringe your rights and freedoms under data protection legislation.

Also, as noted above, in certain circumstances the Trustees may seek your consent to process more sensitive personal data about you, for example medical information if you wish to take your benefits under the Scheme early due to ill health. You have a right to withdraw your consent, but this will not affect any processing which has already occurred (and the Trustees may still need to process your data to some extent, where strictly necessary, to comply with their legal obligations).

For how long do the Trustees keep your data?

The Trustees will retain your data whilst benefits are due and payable to you or your dependants from the Scheme and due to the long term nature of the Scheme will normally continue to store your data for at least 12 years from the date that benefits payable to you or your dependants have been paid in full, you transfer out of the Scheme or the Scheme winds up and ceases to exist having secured all benefits for members outside of the Scheme. However, to enable the Trustees to comply with their legal obligations and in order to be able to answer queries about how your benefits were dealt with (which could be made many years later), it may be necessary for some information to be retained for longer than this. Any processing of your data once you have transferred out of the Scheme or all your benefits have been paid or secured in full will only take place where strictly necessary.

Where is your data held?

Your data will usually be stored within the UK or the European Economic Area ('EEA'). However, there may be some circumstances in which it needs to be transferred overseas, for example to an appointed processor or sub-processor, or if you live or work outside of the UK or EEA, in order to respond to any queries that you may have. Where this applies, all steps reasonably necessary will be taken to ensure that your data is treated securely and in accordance with this notice. If you wish to know more about the safeguards in place, please contact Gallagher using the contact details below.

Updating data and your other rights

It is important to inform the Trustees of any changes in your personal details to ensure the information held is accurate and kept up to date. If you need to do this, or wish to know more about the information held by the Trustees or the purposes for which it is held, please contact Gallagher using the following contact details:

Ibstock Pension Scheme, Gallagher (Ipswich), PO Box 323, Mitcheldean, GL14 9BL.

Telephone: 0330 123 0617

Email: ibstockPensions@ajg.com

In addition, you are entitled to:

- request access to or removal of any personal data being held by or on behalf of the Trustees;
- object to the processing of your data (and ask the Trustees to stop doing so) where the Trustees are relying on their legitimate interests as the legal basis for processing (unless these override yours); and
- withdraw your consent to the use of your data, to the extent such use is based on your consent.

The provision of your personal data is not a requirement of any contract or legislation, nor are you obliged to provide your personal data. However, if you did not, or you exercise some of the rights above, the Trustees may be unable to administer your benefits, so you would have to cease to be a member of the Scheme, or the Trustees may have to adjust or withhold payment of your benefits.

If you have a complaint about the Trustees' management of your data, you have the right to lodge a complaint with the Information Commissioner's Office, which can be contacted on 0303 123 1113 or via other methods of communication as explained on their website (currently <https://ico.org.uk>).

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