

The Amcor Holding 2023 UK Pension Plan – Amcor Bemis Section

Privacy Notice

Introduction

The Trustee of the Amcor Holding 2023 UK Pension Plan (the "Plan") is a "Data Controller" for the purposes of the data protection laws.

In its capacity as Data Controller, the Trustee is entitled to process the Personal Data of its stakeholders (customers, employees, shareholders, suppliers, trustees, internet users etc.) in the ordinary management of existing relations and to acquire consent if necessary. Data processing for commercial purposes is carried out only if specifically authorised by Data Subjects.

The current data protection laws are set out in the Data Protection Act 2018 and Data (Use and Access) Act 2025. Scope of Privacy Notice

This Privacy Notice sets out how the Trustee obtains, uses and protects the Personal Information that they hold about members and other beneficiaries of the Plan.

You should share this notice with your family and dependants where you have provided us with personal information about them.

What is Personal Information?

Personal Information is information that identifies a living individual. This would include any information provided to us by or on behalf of you, your employer or HM Revenue & Customs in relation to your actual or potential membership of the Plan.

Personal Information we may collect about you

The Privacy Policy governs the use and storage of your data.

Personal Information we may collect about you include:

- your name, contact details (your postal address, email address, mobile and telephone numbers), gender, date of birth, occupation, description of physical or mental health and identifiers such as your National Insurance number, pension or member reference number and your employee number (where applicable);
- family, lifestyle and social circumstances such as details about your current marriage or partnership and marital history, details of family and dependants;
- employment details such as your pensionable pay, length of service, employment and career history, recruitment and termination details, attendance records, job title and job

responsibilities; financial records such as any other income, pension payments, tax code, bank account details, and other benefits;

- information about criminal convictions if these relate to money owed to the employer in circumstances where the employer is entitled to be reimbursed from your benefits;
- any information regarding your dealings with us.

This information may be provided directly by yourself or by the companies Amcor Flexibles Swansea Ltd or Amcor Holding.

Sometimes the Trustee obtains information from other sources: for example, from government departments such as HMRC and DWP; and from publicly accessible sources (eg the electoral roll) if the Trustee has lost touch with you and is trying to find you. The Trustee may in turn pass this to the Plan's administrators and advisers.

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

How do we use that Personal Information and who we may share your information with?

The Trustee needs to use your Personal Information to administer the Plan, and to calculate and pay benefits. Under the legislation, this means that we have a legitimate interest in processing the information for the following purposes:-

- to administer the Plan including to process data to calculate and pay benefits;
- to carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information, benefits and services that you request from us;
- in relation to any correspondence (including queries relating to your membership of the Plan) related to the administration of the Plan;
- to notify you about our services and changes to our services;
- to trace your most recent location in order to communicate your benefits to you;
- for statistical, financial modelling and reference purposes;
- for internal record keeping;
- risk management including credit risk analysis;
- complying with any present or future law, rule, regulation, guidance or directive, and complying with any industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and complying with any subpoena or court process, or in connection with any litigation;
- in connection with any sale, merger, acquisition, disposal, recognition or similar change involving the Plan;

- to use IP addresses to identify the location of users, to block disruptive use, to establish the number of visits from different countries;
- to analyse and improve the activities, services and information offered by Benefit Options (the Plan administrator's online administration site).

Personal Data relating to the Plan is held on paper and on computer systems. As the Data Controller, the Trustee must process this information fairly and lawfully.

Due to the nature of running the Plan, we may also need to hold and process some particularly sensitive information about you and/or your dependants and beneficiaries. This is known in law as "Special Categories of Personal Data" and includes information that relates to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. The Plan will only collect any sensitive personal data from you when it is needed, for example information about your health if you apply to receive your benefits on the grounds of ill health.

The administration of your pensions benefit is provided by Quantum Actuarial LLP (Quantum). To calculate your entitlement to any benefit under the Plan all information above will be processed by Quantum. Previous administrators of the Plan may retain your personal information to defend any potential claims that arise as a result of their historic processing activities.

As a result of the buy-in with an insurer, Rothesay Life plc, process your data as a Data Controller. Their separate privacy notice can be found here: <https://www.rothesay.com/data-protection/privacy-notice-for-scheme-members/>.

We may at times be required to share your data with other third parties. Examples of this include:-

- as part of our financial due diligence auditing firms will be employed to audit our records;
- tracing services may be used to prove your most recent location to communicate to you your benefits;
- secure storage firms will be used to securely store any physical information produced whilst administering the Plan;
- payroll providers may be used to calculate and pay your pension;
- AVC Fund providers where applicable will keep Personal Information to maintain any additional benefit you accrue;
- Plan Actuary and other advisers to the Trustee;
- the Money and Pensions Service (MaPS), Pensions Dashboards providers and Integrated Service Providers (ISP) to enable Pensions Dashboard compliance and functionality;
- annuity providers may be engaged to pay your pension benefit. For the provider to calculate any entitlement they will need personal information and, in some circumstances, sensitive personal information. Details of this will be provided at the time;

- regulatory bodies, such as HMRC, the Pensions Ombudsman, the Pensions Regulator and the Information Commissioner.

We may share your data with any third party based outside of the European Economic Area if one of our suppliers ensure the appropriate safeguards are in place.

Plan Actuary

The Plan Actuary is appointed by the Trustee to value the Plan benefits and carry out other calculations in relation to your Plan benefits. They will use your personal information for this purpose and have a legitimate interest in doing so. The Plan Actuary will also use your personal information to comply with their own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

How long do we keep Personal Information for?

The Trustee needs to hold and process information about you for us to administer the Plan, and to calculate and pay benefits. Under the legislation, this means that we have a legitimate interest in processing the information. We also hold your information to allow us to comply with our obligations towards members under the Plan's governing documents, as well as relevant legislation.

We will not collect any Personal Data from you that we do not need.

To correctly administer the Plan, we need to be able to prove what benefits you were entitled to under the Plan and what has happened to this benefit.

For example, should a member take a refund of their benefit and later, their dependant determines that they were a member of the Plan, the Plan must be able to demonstrate why benefits are no longer payable. For this reason, we will keep the information needed to identify you as long as necessary to comply with our legal obligations and resolve disputes. The majority of your Personal Information that we hold will therefore be kept for a period of 15 years from the end of the Plan year in which the last payment from the Plan is made to or in respect of you. This does not apply in the case of any sensitive personal data provided to the Plan. This information will be kept for the minimum time period that is required by law and in most circumstances for no longer than six years.

Please note, the Plan's Independent Trustee (PAN Trustees UK LLP ("PAN")) may continue to hold personal data collected through its role as Trustee even when it is no longer a Trustee of the Plan. Information about PAN's approach in this situation to data security as a firm can be found at www.pantrustees.co.uk/Scheme-GDPR/

What are your rights?

- As a Data Subject you (or someone else on your behalf) can exercise your right of access to know what Personal Data is held about you, its origins and how it is used.

- If you believe that the Personal Data we hold about you is inaccurate, you can request to have it the data to be updated, rectified, supplemented or deleted.
- You can instruct the Plan to restrict the processing of your Personal Data in certain circumstances, for example, whilst an accuracy issue is being resolved.
- You can object to your Personal Data being processed, although the Trustee can override this objection in specific instances.
- Where you have given us your consent to processing your Personal Data, you can withdraw that consent at any time by notifying us.
- You can request that your Personal Data is deleted altogether.
- To complain to the Data Controller (the Trustee) about how your data is (or has been) used. Should the Data Controller be unable to resolve your complaint, you can escalate it to the Information Commission.

You should be aware that taking any of the above steps could impact on the payment of your benefits, the ability for you to build up benefits and our ability to answer questions relating to your benefits. Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about Personal Information?

If you have any questions, comments, or requests or if you wish to see your Personal Data, exercise any of your rights mentioned above or make a complaint about how we have handled your Personal Data, please contact the Trustee at:

The Trustee of the Amcor Holding 2023 UK Pension Plan
C/o: Quantum Advisory
Cypress House
Pascal Close
St Mellons
Cardiff
CF3 0LW

The Trustee will then investigate your complaint and work with you to resolve the matter.

Making a complaint

If you are not happy with the way in which your personal information is held or processed, please contact the Trustee using the contact details above. You also have the right to complain about data protection matters to the Information Commissioner (IC).

The IC is the UK's independent body set up to uphold information rights. You can find out more about the IC on its website (<https://ico.org.uk>). The IC can be contacted by calling 0303 123 1113.