Procter & Gamble Pension Fund (UK) Privacy Policy

Policy Approver: Trustee Board **Date:** April 2026
Policy Contact: Secretary to the Trustee Board
Scope: All Members and Beneficiaries of the Fund (as defined below).

1.0 Intent

The Trustee respects your privacy. This policy describes who is responsible for the Member Personal Information that the Trustee collects and use about you in connection with the administration of the Fund, how we process Member Personal Information, the types of information we collect, for what purposes we use it, with whom we share it, and the rights you have and the choices you can make about our use of Member Personal Information. We also describe how you can contact us about our privacy practices.

If you have any questions about this policy, please consult the Secretary to the Procter & Gamble Pension Trustee Board at PGPensionTrustee@shared.pg.com

In this policy, certain terms that are capitalised have the meanings set out at the end of this policy. References to **we**, **us** or **our** means the Trustee, and references to **you** or **your** means Members or Beneficiaries (as appropriate).

2.0 Principles

The Trustee will apply the following principles when processing your personal data:

- Respect individual privacy
- Comply with any relevant laws
- Follow appropriate standards and procedures when collecting, using and/or managing Member Personal Information

3.0 Policy

3.1 Who is responsible for the Personal Information that we collect?

The Trustee is the data controller for the purpose of data protection law and determine the purposes and means for which Member Personal Information is collected and used.

Where you share information relating to a third party you may need to have the consent of that third party (where appropriate) prior to sharing that information. You may be asked to confirm that you have obtained their consent (where required in accordance with applicable law) and have made the information in this privacy policy available to them.

3.2 What types of Member Personal Information Do We Collect?

The Member Personal Information that the Trustee collects and use about you and your Beneficiaries in connection with the administration of the Fund will include information that you provide to the Trustee, information that the Trustee collects about you and your Beneficiaries, and information that the Trustee receive from other sources. The types of Member Personal Information the Trustee may collect from or about you or your Beneficiaries include the following categories of personal data:

- General employment/enrollment data (such as name, gender, addresses, government ID (National Insurance number), contact information, date of birth, marital status)
- Payroll and benefits data including leave of absence data
- Bank account details for payment of regular pensions/lump sums
- Membership of AXA PPP healthcare in order to make pension payroll deductions,
- Data required for legal and regulatory compliance, including information gathered as a result of IDRP proceedings, internal investigations, regulatory inquiry, or related to litigation
- Information you choose to share (such as communications via the Aon Helpline)
- Public records
- Health records you consent to sharing or as required to be collected by law
- Details of Beneficiaries for the purpose of life assurance or spouse/dependent pension provision. This may include but is not limited to identification data such as name, address, date of birth, passport/birth certificate, financial dependence data, divorce papers, wills.

3.3 For What Purposes Do We Use Member Personal Information?

- We collect and manage Member Personal Information in connection with the Fund's Rules, regulatory requirements and legitimate business interests, including protecting the Fund and its members and Beneficiaries. In particular, Member Personal Information may be used by the Trustee, our service providers, and disclosed to third parties for the following purposes: Ensuring that the Fund is administered in accordance with its governing documents.
- Calculation and provision of annual benefit statements
- Calculation and provision of retirement estimates and benefit estimates
- Communicating with Members in general regarding options and changes to benefits
- Securing money purchase benefits outside of the Fund for members of the DC Section of the Fund.
- Transfer of data to P&G to manage benefits
- Obtaining relevant information for the purposes of exercising discretions under the Rules of the Fund
- Process transfer requests or quotations requested as part of a divorce
- Provision of benefit information to P&G as a result of divestiture
- Litigation, investigations, audits, valuations of the Fund, dispute resolution
- Compliance with tax and other legal or regulatory requirements for both the Fund and also P&G
- Complying with obligations to notify HMRC and the Pensions Regulator of certain events
- Process and service improvement
- Funding the pension scheme and liability management

Data protection legislation seeks to ensure that the way personal information is used is fair. To comply with data protection legislation, we need to tell you the legal justification we rely on for using your personal information for our purposes.

While the law provides several legal justifications, the table below describes the main legal justifications that apply to our purposes for using your personal information. Depending on the circumstances, more than one condition may apply (for further information on legal basis for processing please contact PGPensionTrustee@shared.pg.com):

	Legal justification for processing			
Purpose	**Compliance with a legal obligation**	**Performance of a contract with you or to take steps at your request prior to entering into a contract**	**Necessary for our legitimate interests or those of a third party**	**Consent**
Ensuring that the Fund is administered in accordance with its governing documents	✓		✓	
Calculation and provision of annual benefit statements	✓		✓	
Calculation of retirement estimates and benefit estimates	✓	✓		
Communicating with Members in general regarding options and changes to benefits	✓		✓	
Securing money purchase benefits outside of the Fund for members of the DC Section of the Fund	✓	✓	✓	
Transfer of data to P&G to manage international pension benefits	✓		✓	
Obtaining relevant information for the purposes of exercising discretions under the Rules of the Fund.	✓		✓	
Process transfer requests or quotations requested as part of a divorce	✓	✓		
Provision of benefit information to P&G			✓	

as a result of a divestiture				
Litigation, investigations, audits, valuations of the Fund, dispute resolutions	✓		✓	
Compliance with tax and other legal or regulatory requirements for both the Fund and also P&G	✓		✓	
Complying with obligations to notify HMRC and the Pensions Regulator of certain events	✓		✓	
Provision of benefit information to P&G as part of information to be shared (ie during redundancy discussions).				✓

Where we rely on our legitimate interests or the legitimate interests of a third party to justify the purposes for using Member Personal Information, those legitimate interests will usually be:

- the operation and administration of the Fund in accordance with the Fund Rules by the Trustee and third parties (including, for example, the Trustee's advisers and service providers);
- pursuit of our commercial activities and objectives, or those of a third party;
- compliance with applicable legal and regulatory obligations, and any guidelines, standards and codes of conduct (for example, by carrying out background checks or otherwise preventing, detecting or investigating fraud);
- improvement and development of our operations and service offering, or those of a third party; or
- the operation and administration of P&G benefits (such as the International Pension Protection, International Retirement Arrangement and the Associate Scheme)

In some circumstances where there is a legal or contractual requirement for the Trustee to collect and process Member Personal Information, if that data is not provided then the Trustee may be unable to discharge their requirements and you (or your Beneficiaries) may not be able to receive pension benefits.

3.4 How Do We Process Special Categories of Member Personal Information?

For special categories of Personal Information, we will rely on one or more of the legal justifications set out in the table above and typically one of the following additional justifications (however other legal justifications may be available):

- the use is necessary for performing or exercising obligations or rights of the employer or employee under employment laws;
- the use is necessary for establishing, exercising or defending legal claims;
- the use is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis or the provision of health or social care or treatment or pursuant to a contract with a health professional;
- the use is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment in accordance with applicable law;
- the use is necessary to make a determination in connection with eligibility for, or benefits payable under, an occupational pension scheme where the data relates to an individual who is the parent, grandparent, great-grandparent or sibling of a member of the scheme; or
- your explicit consent (in specific circumstances).

3.5 How Do We Share Member Personal information?

The Trustee may need to share Member Personal Information with various third parties from time to time in connection with the purposes set out above.

The Trustee uses third parties to provide services on our behalf, including to provide pension and AVC administration, annuity provision and to host the Trustee's own data. A list of the current key third party data processors is listed in Appendix A (please note that the third parties listed may be changed from time to time). When the Trustee provides Member Personal Information to third parties, we ensure that our contracts with the third parties include appropriate provisions to govern how the third parties can use Member Personal Data.

The Trustee also shares Member Personal Information with third parties who provide actuarial, audit, consultancy and legal advice. In certain circumstances the Trustee will also share Member Personal Information with companies within the Procter & Gamble group of companies. A list of these current key third party data controllers with whom information is shared is listed in Appendix B (please note that the third parties listed may be changed from time to time).

Member Personal Information will be shared with our advisers as appropriate to fulfill business-related purposes. We may disclose Member Personal Information to other third parties if we are required to do so by law or legal process, to enforce or protect the rights and policies of the Fund, or in connection with an investigation of suspected or actual illegal activity.

3.6 What Are Your Privacy Rights?

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights using the contact details below.

	Summary of your rights	Who to contact
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.	Secretary to the Trustee Board (PGPensionTrustee@shared.pg.com)
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.	Secretary to the Trustee Board (PGPensionTrustee@shared.pg.com)
Right to erasure of your personal information:	You have the right to ask that your personal information be deleted in certain circumstances. For example: (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.	Secretary to the Trustee Board (PGPensionTrustee@shared.pg.com)
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example: (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.	Secretary to the Trustee Board (PGPensionTrustee@shared.pg.com)
Right to data portability	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.	Secretary to the Trustee Board (PGPensionTrustee@shared.pg.com)

	Summary of your rights	Who to contact
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances including in relation to profiling. For example: (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.	Secretary to the Trustee Board (PGPensionTrustee@shared.pg.com)
Rights relating to automated decision making	You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you. However, this right only applies in certain circumstances. This right is not applicable if: • we need to make the automated decision in order to enter into or fulfil a contract with you; • we are authorised by law to take the automated decision; or • you have provided your explicit consent to the decision being taken in this way using your Personal Information.	
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information. You can withdraw your consent by contacting the email address to the right.	Secretary to the Trustee Board (PGPensionTrustee@shared.pg.com)
Right to complain to the relevant data protection authority	You have the right to complain to the relevant data protection authority (which is the Information Commissioner's Office) at any time where you think we have not used your personal information in accordance with data protection law.	https://ico.org.uk/concerns/

3.7 Do We Transfer Member Personal Information?

Yes, as P&G is a global business, the Trustee may transfer personal information to countries outside the EEA which are not deemed to provide adequate protection for Member Personal Information.

The Trustee will transfer information outside the EEA to P&G group companies, service providers and governmental and regulatory authorities. P&G, as a global business, has employees who move between countries and a number of global benefit plans. Member Personal Information may be transferred to other countries where necessary to administer those global benefit plans. This means that your Member Personal Information may be transferred to countries outside of the EEA where Members have currently or previously worked or where the global benefit plan is administered from. These

countries include Switzerland, the US and Singapore. The Trustee may use certain outsourced cloud solutions that may involve certain Trustee data being hosted outside the EEA, such as meeting documents and minutes, discretionary decision information documents and analysis files.

When making these transfers, the Trustee will take steps to implement appropriate safeguards to adequately protect and transfer your information in accordance with the requirements of data protection law. This typically involves the use of data transfer agreements in the form approved by the European Commission and permitted under Article 46 of the EU General Data Protection Regulation (**GDPR**) (the relevant data protection law). If there is no data transfer agreement in place, we may use other mechanisms recognised by the GDPR as ensuring an adequate level of protection for Personal Information transferred outside the EEA (for example, the US Privacy Shield framework or any framework that replaces it).

If you would like more information about these transfers and to obtain a copy of the safeguards in place, please contact PGPensionTrustee@shared.pg.com .

3.8 How long do we keep Member Personal Information for?

We keep Member Personal Information for as long as necessary for the purpose for which we collect it for. In some cases, we may need to retain Member Personal Information for a certain period of time in order to comply with legal or contractual obligations. The nature of the Fund and the Members and Beneficiaries is that it a long-term commitment where benefits are paid out over a long period of time. We will retain Member Personal Information until seven years after the Fund has wound up.

This retention policy will be reviewed on an annual basis to ensure that we are only keeping data where the Trustee believe it is necessary to do so.

For further information about the period of time for which we retain your Personal Information, please contact PGPensionTrustee@shared.pg.com .

4.0 Additional Information

Contact information: If you have questions about your Member Personal Information, please contact the Secretary to the Trustee Board at:

Email: PGPensionTrustee@shared.pg.com
Post: Cobalt 12, Silver Fox Way, Cobalt Business Park, Newcastle upon Tyne, NE27 0QW
Telephone: 0191 297 5000

Questions About Use of Your Personal Information: If you are asked to provide Personal Information about yourself or your family members and you question the relevancy of the request or if you have other questions or concerns regarding your Member Personal Information, please contact the Secretary to the Trustee as above.

Future Modifications of This Policy: The Fund reserves the right to modify this policy as needed, for example, to comply with changes in laws, regulations, practices and procedures, or to respond to new threats or new requirements imposed by data protection authorities. This policy was last updated in April 2026.

5.0 Definitions

Beneficiary(ies): Beneficiary or Beneficiaries refers to any third party who is in receipt of, or may prospectively be entitled to, a benefit from the Fund by virtue of their relationship with a Member of the Fund such as a spouse or a child.

Member: For the purposes of this policy, the term Member includes current and former Fund members including those who have transferred or commuted their benefits entirely for cash.

Personal Information: Any information relating to an identified or identifiable individual.

Member Personal Information: Any Personal Information relating to a Member or a Beneficiary.

The Fund: For the purposes of this policy, the Fund refers to the retirement benefit scheme known as the Procter & Gamble Pension Fund established under a trust deed dated 29 January 1947 with rules adopted by a deed of amendment dated 18 January 2013 as amended from time to time.

The Company or P&G: For purposes of this policy, the Company or P&G refers to The Procter & Gamble Company and its subsidiaries.

Trustee: The Trustee of the Fund from time to time.

Appendix A - Data Processors

The Trustee may engage the following key categories of data processors to process Member Personal Information on behalf of the Trustee (please note that this list may change from time to time):

Category of data processor	Name of data processor currently used
Pension Administration, Pension Payroll and Accounting	Aon Solutions UK Limited (from 28th May 2024) Capita Employee Benefits Limited (up to 25th May 2024)
Duracell COMP scheme investment and administration	Equitable Life (up to 1st Jan 2020) Utmost Life (from 1st Jan 2020) Capita Employee Benefits Limited (from August 2020) Aon Solutions UK Limited (from 28th May 2024)
AVC policy administration	Clerical Medical
Financial sanctions checking	Lexis Nexis (sub processor of Aon Solutions UK Limited).

Appendix B - Data Controllers

The Trustee may share Member Personal Information with the following key categories of data controllers (please note that this list may change from time to time):

Category of data controller	Name of data controller currently used
P&G Group Companies	Procter & Gamble UK Procter & Gamble Technical Centres Limited Procter & Gamble Product Supply (U.K.) Limited Gillette U.K. Limited Lamberts Health Care Ltd. Procter & Gamble International Operations SA Procter & Gamble Co.
Actuarial advisors	Aon Solutions UK Limited (please see privacy policy below)
DC and investment advisors	Barnett Waddingham LLP
DB investment advisors	Aon Investments Limited
Legal advisors	Womble Bond Dickinson (UK) LLP
Independent Adjudicator	Alison Marshall
AVC policy administration	Phoenix Life Prudential
Auditor	Deloitte LLP
Annuity policy	Phoenix Life Friends Provident
Tax authority	HMRC
State pension	Department for Work and Pensions
Regulatory authority	The Pensions Regulator
Ombudsman	The Pensions Ombudsman

Aon Solutions UK Limited Quick Read privacy notice

Aon Solutions UK Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp, or you can request a copy by contacting us, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH