

International Power Group of the Electricity Supply Pension Scheme (ESPS)

Data Protection Privacy Notice - How we use information about you

We, the Group Trustee Directors of the International Power Group (the Group) of the ESPS, will use your personal details to assess, deal with and pay any benefits you or your dependants may be entitled to under the rules of the International Power Group of the ESPS (the Scheme). We will also contact you about matters relating to the administration of the Group.

As part of the service we provide we may share your information with other organisations for the purposes of identifying accurate information as to your whereabouts or for the purpose of paying any benefits that you may be entitled to. We explain more below about who we might share our data with and why. We will handle your data in compliance with all relevant data protection legislation, including the UK General Data Protection Regulation (GDPR). The Group Trustee of the International Power Group of the ESPS is the data controller in respect of your personal information for the purposes of applicable data protection legislation.

What information we process

This information may include:

- personal details, such as name, age, gender, date of birth, email and postal address, telephone or mobile number
- family, lifestyle and social circumstances
- financial details
- employment and education details
- goods or services provided

We may also need to process sensitive classes of information, such as physical or mental health details, in order to administer ill-health retirement payments and applications.

This information may be obtained from your employer, ex-employer, government agencies, service providers or from yourself.

Grounds on which we process your personal information

We will only collect and use your personal information where:

- there is a legal obligation for us to do so;
- it is for our legitimate business interests; or
- you have given us your consent to do so.

Our legitimate business interests include fulfilling our role in dealing with, assessing eligibility for and paying any benefits you may be entitled to, and the efficient administration of an occupational pension scheme. We will not use your data for our legitimate business interests if they are overridden by your interests, rights or freedoms.

You do not have to provide the information requested from you, but there may be a delay in the payment of your benefits if that information is not provided.

If we are processing your data on the basis of your consent you can withdraw your consent at any time by contacting Railpen (details shown under further information). The withdrawal of consent will not affect the processing of personal data carried out before consent was withdrawn.

Failure to provide information or consent, or withdrawing consent, could result in a decision being taken based only on the information available, which could exclude information favourable to your case. It may also delay the payment of your benefits.

Who the information may be shared with

From time to time we may need to share your information with other organisations. Where this is necessary we are required to comply with all aspects of relevant data protection legislation.

Your information will be shared with Railpen in order for them to provide pension administration services in line with the reasons/purposes outlined above.

The types of other organisations we may need to share some of your information with are:

- your employer or former employer
- claimants, beneficiaries, assignees and payees
- other pension schemes with which you have an association (e.g. if you have requested a transfer payment)
- trade and business associates, service providers and professional advisers
- auditors
- healthcare, social and welfare organisations
- financial organisations and advisers
- central and local government
- service providers
- ombudsmen and regulatory authorities
- suppliers
- family, associates or representatives of the person whose personal data we are processing
- tracing agencies and verification service providers
- insurers, reinsurers for the purpose of liability management exercises

Any processing performed by any party that we share your personal data with will be governed by a data processing agreement in the form required by law, and designed to protect your statutory data protection rights.

Retention of data

One of the key principles of the relevant data protection legislation, including the UK GDPR, is that the personal data we store and process shall be adequate, relevant and limited to what is necessary for the purpose it was originally collected. Our standard policy is for information or data to be kept for only as long as necessary. It is then disposed of in a managed and secure way. However, as pensions are a long term saving vehicle it may be necessary to retain your personal data for the remainder of your life and any dependants' lives in order to pay you the benefits you are entitled to along with any dependant's benefits payable. Some data may need to be kept for the life of the Scheme.

Our core systems, data, and administration services are all carried out and stored within the UK. If any of our service provider transfers personal data outside of the European Union or the European

Economic Area, they must ensure that appropriate safeguards are in place to protect the security of your data.

Completing forms on behalf of a child

If you are completing forms on behalf of a child we may also hold and use your personal information, which will be dealt with on the same basis as set out above.

Your rights

You will have a number of rights under data protection legislation. These include the right to:

- access the information we hold about you, together with information about how and on what basis that information is processed;
- request personal data to be amended if it is inaccurate or incomplete;
- request the deletion or removal of personal data where there is no compelling reason for its continued use;
- block or restrict the processing of your personal data in certain circumstances; and
- object to the processing of your personal data in certain circumstances

There is also a right under the UK GDPR to receive your personal data (in a structured, commonly used and machine-readable format) and to transfer your data to another service provider or data controller. This right applies where your data is being processed on the basis of your consent or in line with a contract to which you are party. Please note that for the majority of members, this is not applicable as we rely on our legitimate business interest and our legal obligations to collect and process your data rather than individual consent or contracts.

Further information

If you wish to exercise any of your rights or have concerns about the processing of your personal data or, on behalf of the child in whose name this claim is made, or wish to raise any issues in relation to data protection, including in relation to the use of it by the Group Trustee or Railpen, please contact Railpen:

Railpen
Unit 2, Rye Hill Office Park
Birmingham Road
Coventry
CV5 9AB

Tel: 02476 472 896

Email: enquiries@railpen.com

If you are unhappy with how your personal information is being handled you also have the right to make a complaint to the Information Commissioner's Office, an independent body set up to uphold information rights, which will investigate your complaint.

Other data controllers

The Scheme Actuary (Jeremy Dell FIA of Lane Clark Peacock LLP) acts as a joint data controller in relation to your personal information that he uses to carry out his statutory functions. These statutory functions are carried out in line with data protection laws and Jeremy is listed on the register of data controllers held by the Information Commissioner's Office. For further information please see <https://www.lcp.com/en/third-party-privacy-notice>.

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.

Our legal advisers, DLA Piper, are also data controllers in relation to the Group. They will only have access to personal information which the Group Trustee shares with them and they will only use that information for the purposes of providing legal advice to the Group Trustee and for no other purpose.

For a copy of DLA Piper's privacy notice please go to <https://www.dlapiper.com/en/uk/privacy-policy/> or you can write to them at DLA Piper Privacy Team, DLA Piper UK LLP, 160 Aldersgate Street, London EC1A 4HT or email them at web.enquiries@dlapiper.com.