

Rexel UK Pension Scheme (“the Scheme”)

Privacy Notice

Trustee’s commitment to your privacy

The Trustee is committed to protecting and respecting your privacy and rights as a member of the Scheme. This Privacy Notice (“Notice”) is to notify you of the Trustee’s obligations when using your personal data, how we will use personal data about you, how we will collect certain personal information, under what circumstances we may share or otherwise use the personal data and who we may disclose this personal data to.

For the purposes of the data protection laws (including the Data Protection Act 2018 and the retained EU law version of the EU General Data Protection Regulation (EU Regulation 2016/679)) the Trustee is the ‘data controller’. The Scheme’s actuarial advisors, XPS Pensions Group, including the individual Scheme Actuary, are joint data controllers with the Trustee. The contact details for the data controllers can be found below. The controllers hold and use your data (referred to as ‘processing’ under the data protection laws).

This Notice covers any personal data (also referred to as “information”) that we collect and use to operate the Scheme.

Information the Trustee may collect from you

The Trustee may collect and process the information you provide to them in connection with the Scheme. This could include your date of birth, gender, marital status, length of employment, certain sensitive personal information (see below for further details), bank details, National Insurance Number and details of your dependants. It will also include your contact details such as residential address, email address and telephone number. You need to provide this information to the Trustee in order for it to correctly calculate and pay your Scheme benefits. You may have to provide some of this personal data to us under the terms of your employment contract, for example, or as a condition of membership of the Scheme, or by law, for example if you are required to tell us about benefits you have taken from another pension arrangement.

If you do not provide us with this information, we will not be able to properly and accurately administer your benefits under the Scheme and you may not receive the benefits you are entitled to.

Information the Trustee may collect from others

Whilst in employment we will receive details, to the extent they are relevant to your Scheme benefits, of your earnings and employment history (e.g. part time hours or non-pensionable absences) as well as contributions you make to the Scheme.

We may also collect information from other parties such as previous or future employers, anyone who might be entitled to benefits as a result of their connection with you, family members or personal representatives, people who have named you as a potential beneficiary in relation to their own pension benefits, or government bodies or departments such as HMRC.

Purposes for which and the basis upon which the Trustee will process your personal data

We use information about you to administer the Scheme, including to calculate and pay benefits. The ways that the Trustee will use your information include:

May 2024

- Identifying you and your survivors and making sure your details are up to date
- Communicating with you
- Calculating and paying your benefits
- Making Trustee decisions – such as whether to agree to early payment or how to distribute benefits after your death
- Deciding how to invest contributions paid by you or your employer

Legal basis for processing your information

The Trustee must have a legal reason (often called the legal basis) to hold and use your personal data. The legal reason we hold your personal data is because it is:

- necessary for our legitimate interests in administering the Scheme. It is also necessary for the Scheme's legitimate interests in prudential management and meeting legal accountability and regulatory requirements, such interests in each case not being overridden by your privacy interests and
- required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to record, calculate or pay you or your beneficiaries' benefits.

Sensitive personal data

Data protection laws also aim to protect the way sensitive data (also known as special categories of personal data) is used. For example, information you provide on any nomination form you have completed may be considered to be sensitive as it may give an indication of your sexual orientation, religious belief or membership of a political party or trade union. The Trustee can confirm that any such information will only be used after your death to determine the allocation of any discretionary benefits.

We may also need to use sensitive personal data in other situations. One example might be if we need to know more about your health, should the need ever arise to consider ill-health early retirement options.

Where the Trustee is required to process sensitive personal data, we need another legal reason for doing so, in addition to the ones referred to above. That additional legal reason is that:

- it is processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits, or where the Scheme rules require you to provide information which we cannot otherwise process without your consent.

You will have the right to withdraw this consent at any time. If you do withdraw your consent the Trustee would have to stop using this as the legal reason to process your sensitive personal data in the future.

Storage of personal data

The Trustee will hold personal data relating to Scheme members and their dependants for as long as may be necessary in order to administer benefit entitlements and for the purposes of maintaining records of steps the Trustee has taken to comply with its obligations under the Scheme. Inevitably, this means that personal data may be retained by the Trustee for extremely long periods of time, including after entitlement to receive benefits by an individual and/or their beneficiaries has ceased.

Disclosure of personal data

In the course of administering the Scheme, the Trustee will engage pensions administration service providers, tracing agencies, mailing providers, a scheme actuary, actuarial firms, lawyers, accountants, auditors, insurance companies, investment advisers and fund managers, IT service providers and similar external advisors to assist us. The Trustee may disclose your personal data to these third parties in connection with services provided by the third parties to the Trustee. Those third parties may also disclose your personal data to any sub-processors that they engage in order to provide services to the Trustee. We may also where appropriate share your personal data with the Scheme's employers or their advisers, for example to assist with a benefit options exercise or as part of funding discussions.

The Trustee may also disclose your personal information to third parties in the following types of situations:

- in the event that it wishes to consider entering into a buy-out/buy-in of any of the benefits under the Scheme, in which case it may disclose your personal data to the prospective counterparty (and any reinsurer) to such a transaction
- if it is under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirement

Pension dashboards

Pension schemes are legally required to connect to the pensions dashboards ecosystem no later than 31 October 2026 and to respond to 'Find' and 'View' requests. This results in additional purposes for which your personal data will be processed. This includes:

- Responding to 'Find' and 'View' requests submitted via a pensions dashboard pursuant to the Pensions Schemes Act 2021 and Pensions Dashboards Regulations 2022.
- Matching your personal data against requests generated within the pensions dashboards ecosystem.

These activities are necessary for the Trustee to comply with its legal obligations and are carried out in accordance with guidance issued by the Department for Work and Pensions (DWP) and the Pensions Dashboards Programme (PDP).

In addition to the data recipients already listed in this Privacy Notice, your personal data may be shared with:

- The PDP, operated by the Money and Pensions Service.
- The central digital architecture, which routes dashboard data securely.
- The pensions dashboard service selected by you.

This sharing is strictly for statutory compliance and is subject to security and governance requirements set by DWP and PDP.

International transfers of personal data

As required by data protection legislation, the Trustee has strict security procedures regarding the storage and disclosure of personal data. The Trustee does not generally, and has no intention to, transfer or process the personal data that it collects about you outside the European Economic Area.

However, the use and disclosure of your information, may involve transferring your information outside of the European Economic Area. In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will take steps aimed at ensuring that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form

approved for this purpose by the European Commission or (where applicable) relevant authority in the United Kingdom.

Your rights under the EU General Data Protection Regulation

You have the right to access the personal data we hold about you and/or to ask us to rectify, erase, restrict or object to the processing of such personal data.

You have the right to withdraw your consent to the use of your information, to the extent such use is based on your consent. However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out your pension entitlements. You can notify us of your withdrawal of consent by using the contact details set out below.

More information with regard to your rights can be found on [the Information Commissioner's Office's website](#).

Changes to this Notice

The Trustee reserves the right to change this Notice and any other relevant policies or procedures at any time without notice. Any material changes we may make to this Notice in the future will be notified to you. Any changes the Trustee may make to this Notice (which will, unless otherwise indicated, apply to any personal data already obtained by the Trustee before the changes were made) will be effective from the date stated in the notice. Where appropriate, we may also notify you of any changes made by e-mail.

Protecting your data

The Trustee will not disclose or transfer personal data to third parties for the purposes of marketing.

Contact

If you have any questions concerning this Notice or the policies or procedures referred to above, please contact:

Rexel UK Pension Scheme
XPS Administration Limited
PO Box 562
Middlesbrough
TS1 9JA
Email: rexel@xpsgroup.com
Telephone: 0121 752 6610

Making a complaint

If you would like to complain to the Trustee about any aspect of data protection, you can do so by following the Scheme's Internal Dispute Resolution Procedure. Complaints will be acknowledged within 30 days and responded to without undue delay, in accordance with the Data (Use and Access) Act 2025. Full details are available from the Scheme's administrator detailed above.

Where you are dissatisfied with any aspect of our handling of your personal data then we would encourage you to contact us to resolve your complaint. If you remain unhappy then you have a right to lodge a complaint with the Information Commissioner's Office. Their contact details are:

Information Commissioner's Office
Wycliffe House

Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
Email: casework@ico.org.uk

Rexel UK Pension Trustees Limited