

## **PRIVACY NOTICE**

### **for the Dorman Traffic Products Limited Retirement Benefits Scheme**

This notice is for members and beneficiaries of the Dorman Traffic Products Limited Retirement Benefits Scheme (the Scheme). It has been prepared by Dorman Traffic Products Pension Trustees Limited (in its capacity as the Trustee of the Dorman Traffic Products Limited Retirement Benefit Scheme) referred to as the "Trustee" or "we".

#### **Why we are providing this notice to you**

As the Trustee of the Scheme we hold certain information about you ("personal data") which we need to administer the Scheme and pay benefits from it. We are required by law to give you certain information about the data we hold about you, how we use it, and what safeguards are in place to ensure it is protected. This notice is designed to give you that information. You do not need to take any action in response to it.

#### **The technical bit**

The Trustee holds personal data about you in its capacity as data controller for the proper handling of matters relating to the Scheme, including its administration and management, calculating, securing and paying benefits and managing liabilities in relation to it.

The legal basis for our use of your personal data will generally be one or more of the following:

- a) to satisfy our legal obligations as Trustee of the Scheme;
- b) for the legitimate interests of administering the Scheme and calculating and paying benefits from the Scheme and to perform our obligations and exercise any rights and discretions the Trustee has in relation to the Scheme; and/or
- c) because we need to process your data to meet our contractual obligations in relation to the Scheme, or to take steps, at the request of a member, before entering into a contract.

#### **What data we hold**

The types of data we hold and process about you include:

- Contact details, including name, address, telephone numbers and email address.
- Identifying details, including date of birth and national insurance number
- Information relating to your membership of the Scheme that is used to calculate benefits, for example length of service and salary information
- Financial information relevant to the calculation or payment of benefits, for example bank account and tax details
- Information about your family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death
- In certain cases, information about your health, for example, to assess eligibility for benefits payable on ill health, or when your health is relevant to a claim for benefits following the death of a member of the Scheme. (This is considered a "special" category of data – see more information about this below).

We obtain or have obtained some of this personal data directly from you. We may also obtain or have obtained data from your employer (for example salary information) and from a variety of other sources including public databases.

Where we obtain information concerning certain "special categories" of particularly sensitive data, such as health information, extra protections apply under the data protection legislation.

We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by that legislation. If we do need your consent in a particular case, we will ask you for it. You do not have to give your consent and you have the right to withdraw your consent to the processing at any time by notifying the Trustee in writing where the Trustee is relying on your consent to justify its processing. However, if you do not give consent, or subsequently withdraw it, the Trustee may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits. (We may also need to retain some or all of the data for the defence of legal claims).

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Scheme, please ensure that those individuals are aware of the information contained within this notice.

### **How we will use your personal data**

We may use this data to deal with all matters relating to the Scheme, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- to contact you
- to assess eligibility for, calculate and provide you (and, if you are a member of the Scheme, your beneficiaries upon your death) with benefits
- to identify your potential benefit options and, where relevant, implement those options
- to allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements
- to comply with our legal and regulatory obligations as Trustee of the Scheme
- to respond to queries from you and others that may receive benefits as a consequence of your membership, and to address any actual or potential disputes concerning the Scheme
- to manage the Scheme's liabilities, including the entering into of insurance arrangements and selection of Scheme investments
- for statistical and financial modelling and reference purposes.

### **Organisations that we may share this data with**

From time to time we will share your personal data with other organisations so that they can help us carry out our duties and exercise our rights and discretions in relation to the Scheme. The types of organisations we may need to share some of your information with are:

- Scheme Administrators [currently, Mercer Limited]
- Legal advisers [currently, DLA Piper UK LLP]
- Scheme Actuary [currently Clive Lewis, Mercer Limited]
- Actuarial consultants [currently, Mercer Limited]
- Investment advisers [currently, Capita Employee Benefits Ltd]
- Auditors [currently, Hadley & Co]
- Additional voluntary contribution providers [currently, Equitable Life]
- Annuity Provider [Canada Life]

In some instances advisers and service providers will be controllers in their own right and will be directly responsible to you for their use of your personal data. They may be obliged under the data protection legislation to provide you with additional information regarding the personal data that they hold about you and how and why they process that data. Further information

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may be provided to you in a separate notice or may be provided on the advisers' and service providers' websites.

We may also provide some of your data to Unipart Rail Ltd, Unipart Group of Companies Limited and any relevant subsidiaries or parent companies to help them make decisions.

In addition, where we make Scheme investments or seek to provide benefits for Scheme members in other ways, such as through the use of insurance or pension scheme mergers then we may need to share personal data with providers of investments, insurers and other pension scheme operators. In each case we will only do this to the extent that we consider the information is reasonably required for these purposes.

Where requested or if we consider that it is reasonably required, we may also provide your personal data to government bodies and dispute resolution and law enforcement organisations – including the courts, the Pensions Regulator, the Pensions Ombudsman, the Pension Protection Fund and Her Majesty's Revenue and Customs (HMRC). They may then use the data to carry out their legal functions.

In some cases these recipients may be outside the UK / the European Economic Area (EEA). This means your personal data may be sent to a jurisdiction that may not have similarly strict data privacy laws. In those cases, we will ensure our arrangements with any relevant third parties are governed by data transfer agreements, designed to ensure that your data is protected, on terms approved for this purpose by the European Commission. You can ask for copies of these agreements at any time.

We do not carry out any automated processing for marketing purposes using your personal data and will not share this data with anyone for the purpose of marketing to you or any beneficiary.

### **How long we keep your data**

We will only keep your personal data for as long as we need to in order to fulfil the purposes identified above. In practice this means that we will retain your data for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Scheme and for so long afterwards as may be required to deal with any questions, complaints or claims that we may receive about our administration of the Scheme. We may also retain your data for a longer period to comply with our legal and regulatory obligations.

### **Your rights**

You have a right to access and obtain a copy of the personal data that the Trustee holds about you and to ask the Trustee to correct your personal data if there are any errors or it is out of date. In some circumstances you may also have a right to ask the Trustee to restrict the processing of your personal data, to object to processing or to transfer or erase your personal data.

If you wish to exercise any of these rights or have any queries or concerns regarding the processing of your personal data, please contact the Scheme Administrator as indicated below. You also have the right to lodge a complaint in relation to this privacy notice or the Trustee's processing activities with the Information Commissioner's Office. They can be contacted at: [www.ico.org.uk](http://www.ico.org.uk) or via their telephone helpline (0303 123 1113).

The personal data we hold about you is used to administer your Scheme benefits and we may from time to time ask for further information from you for this purpose. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this

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may affect the benefits payable to you under the Scheme. In some cases it could mean the Trustee is unable to put your pension into payment or has to stop your pension (if already in payment).

### **Updates**

In order to enable us to meet our legal obligations, you should notify Mercer Limited of any changes to your personal details (e.g. address or other contact details) as soon as possible.

We may update this notice periodically. Where we do this we will inform you of the changes and the date on which the changes take effect. Any changes will be available on request from Mercer Ltd. Please check for any changes if you are using a printed copy of this notice.

### **Contacting us**

Please contact the Scheme administrator Mercer Limited on 0151 242 7023 or e-mail [john.bowman@mercero.com](mailto:john.bowman@mercero.com) for further information.