

Graphic Packaging UK Pension Scheme (“the Scheme”)

Privacy notice from the Scheme Trustee

As a result of new data protection laws that came into force on 25 May 2018, we have set out below some information on the personal data we hold about you and how it is used. As well as complying with relevant legislation, the Trustee is keen to ensure that anything we do with your data is as clear and transparent as possible. Please read this notice carefully as it contains important information.

The Trustee needs personal information about you in order to run the Scheme and pay benefits.

In legal terms we are a ‘data controller’ and we are required to tell you some things about the personal information we have about you, how we use it and what your rights are in relation to it.

Collection of your information

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, telephone numbers, email addresses, marital status, national insurance number, bank account details (in some cases), and country of residence;
- information relating to your benefits, including your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings, the category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- records of our communications with you, including any complaints; and
- in some cases, special categories of personal data such as information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Where applicable, we also collect information about your nominated beneficiaries, dependants or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

In some cases, the above information may also be collected from other sources:

- Your employer;
- Mercer, who administers the Scheme on our behalf;
- Other schemes (if you have transferred benefits from them);
- Government departments such as HMRC and DWP;
- Publicly accessible sources (e.g. the electoral roll) if we have lost touch with you and we are trying to find you.

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

How we use your information

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other schemes;
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- b) for general administration of the Scheme, including: to record and pay benefits; for actuarial valuations and calculations; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing should we happen to lose contact with you) or to prevent fraud;
- c) for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime;
- d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme; and
- e) when we undertake or agree to activities from time to time to help us manage the liabilities of the Scheme, such as longevity modelling and hedging, insurance, bulk transfers, pension increase exchanges and transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below;
- (ii) necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain;
- (iii) in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or direct us on benefit payments or where the Scheme Rules require you to provide information which we cannot otherwise process without your consent;
- (iv) necessary for our legitimate interests: in pursuing the purposes set out in (a) to (e) above; in establishing, exercising or defending legal claims; and (when we make the disclosures to your employer for the audit and corporate transaction purposes referred to below) necessary for their legitimate interests, such interests in each case not being overridden by your privacy interests; and
- (v) necessary for your legitimate interests in having your benefits administered correctly.

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 your or your beneficiaries' benefits.

Disclosures of your information

We may share your information with the following recipients:

- our suppliers, including your employer and other providers of services to us and them, such as administrators, Banks and Deposit takers, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the Scheme actuary (for actuarial calculations), and printing, communication, IT and hosting and tracing providers (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);
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- your employer for audit purposes or in relation to corporate transactions initiated by them or where necessary for our legitimate interests in pursuing the purpose set out in (e) above;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (e) above;
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- others persons from time to time when the disclosure is needed to exercise or protect legal rights, including our own and those of other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Transfers of your information abroad

The use and disclosure of your information, including for the purpose referred to in (a) to (e) above, 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 require (through a binding agreement) that the recipients comply with appropriate measures designed to ensure 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. Further details of these transfers including copies of any data transfer agreements we use are available from us on request.

Retention of your information

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. To do this, we will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within our retention management policy documentation. We determine the period envisaged within such documentation with regard to the Scheme's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Scheme, and responding to legal claims or regulatory requests.

Your rights

You have rights under data protection law of access to and rectification or erasure of your personal data and to restrict its processing, and (in some circumstances) to require certain of your information to be transferred to you or a third party.

NOTE: You also have rights under data protection law to object to the processing of your information on grounds which we have said are necessary for our legitimate interests (see above), or for marketing purposes (see above).

If you have any questions or wish to exercise any of the above rights, you can contact us as detailed below.

You also have the right to withdraw your consent to the use of your information, to the extent such use is based on your consent.

You can also lodge a complaint about our processing of your personal information with the office of the Information Commissioner (www.ico.org.uk).

Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

Other Controllers

Other parties also need personal information about you in order to support the running of the Scheme:

- James Auty, the Scheme Actuary employed by Mercer;
- Aon Hewitt Limited, the appointed Corporate adviser
- Kempen Capital Management (UK) Limited, the appointed Fiduciary Manager
- Paul Crowdy Partnership, the scheme auditor
- Squire Patton Boggs (UK) LLP, the appointed Legal Adviser
- Wren Sterling, the appointed financial adviser for when member's retire
- Phoenix Life, an annuity provider
- Canada Life, an annuity provider
- Sun Life Financial of Canada, an annuity provider
- Generali, an annuity provider
- Royal Bank of Scotland, who operate the Trustee bank account

In legal terms they are also a 'data controller' and are required to tell you some things about the personal information that they have about you, how they use it and what your rights are in relation to it.

They have produced their own information statement around this, which are available on request.

Status of this privacy notice

This privacy notice was updated in September 2021. It is non-contractual. We reserve the right to amend it from time to time but will notify you where we do this.

Trustee of the Graphic Packaging UK Pension Scheme

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