



AMG UK GROUP 2006 PENSION PLAN

Personal information and what we do with it

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

In legal terms, the Trustee is a 'controller' in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

The Scheme Actuary (currently Paul Crocker of Aon Solutions UK Limited Solutions Limited ("**AON**") is also a 'controller' and a Privacy Notice is available for the Scheme Actuary at the following web address : <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>

In this notice, you will see information about what the Trustee does with your personal information. We also describe who to contact if you wish to exercise your rights under data protection laws in relation to the use we make of your information.

Except where stated otherwise, 'we' or 'us' means the Trustee .

What personal information we have

We normally hold some or all of the following types of personal information:

- Your name, date of birth, national insurance number and bank account information (where benefits are in payment).
- Your sex/gender (we use sex to understand how long you are likely to receive your pension for and gender as part of your addressee details if we write to you e.g. 'Mr., Mrs., Ms.')
- Contact details (including your address, phone numbers and email address).
- Information contained in birth, marriage and death certificates, passports and utility bills.
- If your benefits from the Scheme derive from your employment, details of your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information we might need to pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.
- Details of any contributions paid by you or on your behalf to the Scheme, including additional voluntary contributions (AVCs).
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Scheme.
- Correspondence received about you from HMRC, relating to periods of service when you may have been contracted out of the upper tier of the state pension.
- Correspondence that we may have received about you from your appointed independent financial adviser.

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme, or details about personal relationships to determine who should receive benefits on your death. We may have information about gender reassignment, if you have a gender recognition certificate or have told us that you identify with a different gender from your birth sex. We may also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

We also have a legal obligation to carry out due diligence checks in the event of a pension transfer request, which may mean that we are obliged to ask you for additional information. For instance:

- If you wish to transfer to an occupational pension scheme, we have to request evidence that demonstrates an "employment link". This could include a letter from your employer confirming your employment, a schedule of contributions, payslips and bank statements (the bank account detail on your payslip might be different from the bank details we hold for you).
- If you request a transfer to an overseas pension scheme, we are legally obliged to check that you are resident in the same country as that scheme. This evidence might include utility bills,

TV subscriptions, insurance documents relating to your overseas home, address, bank account and credit card statements, evidence of local tax being paid and registration of address with local doctors.

Where we get personal information from

Some of the information we have comes directly from you. In addition, Aon, who administer the Scheme on behalf of the Trustee, may have obtained information from you and passed it to us which we may then pass on to other data controllers. The Trustee is the source of the personal information which the other advisers have about you.

Sometimes we get information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another scheme if you have transferred benefits from that scheme; from government departments such as HMRC and DWP (tax codes notification, GMP reconciliation work); and through third party tracing services which use publicly accessible sources (e.g. the electoral roll, General Register Office registers, Royal Mail's Postcode Address File) if we have lost touch with you and we are trying to find you or if you repeatedly do not respond to our correspondence or if correspondence is returned back to us by Royal Mail. We may in turn pass this to other controllers (such as the Scheme Actuary).

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.

Why we hold personal information and how we share it

We must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to the running of the Scheme. In addition, the Trustee is required to process your personal data in order to provide the pensions benefits under your Employment contract.

We will use your personal information to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud. We may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

We also have a legitimate interest in properly administering the Scheme. This includes: paying benefits as they fall due; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance). We make sure that your own interests are not outweighed or prejudiced by our legitimate interests.

In order to achieve this, we may share your personal information with various people, including: any new trustees or trustee directors; the Scheme employers; the Scheme administrator; the Trustee's other professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman; the Pensions Regulator; the Information Commissioner; bank managing the Trustee bank account; tracing bureaux; external print houses; identity, sanctions & money laundering verification providers and IT infra-structure and application support providers and other service providers. If your benefits are transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

When we need to use information about your health, we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use information about your health (or other very personal information, such as details about personal relationships relevant to who should receive benefits on your death, or information on gender reassignment) without consent, and we will do so where that is necessary to run the Scheme in a sensible way. You can withdraw your consent at any time by contacting us using the contact details given below. This may affect what we can do for you, unless we have another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to us processing your health data for that, but then you withdraw that consent, we will usually be unable to consider your application. If you withdraw consent after our processing, this will not retrospectively affect the processing that has already happened.

Sometimes we need to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims.

We may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Scheme.

The Scheme's employers may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, we may share your personal information with the employers so that they can contact you for that purpose.

Scheme Actuary

The Scheme Actuary is appointed by the Trustee to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. He will use your personal information for this purpose and has a legitimate interest in doing so. The Scheme Actuary will also use your personal information to comply with his own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. He may also share it with his own professional advisers, auditors and insurers, IT and data storage providers and other service providers. A Privacy Notice setting out when, why and how the Scheme Actuary collects and uses your personal data in carrying out their duties is available at the web address provided on page 1 of this notice.

Sometimes, your information may be used by the Trustee and the Scheme Actuary for statistical research, but only in a form that no longer identifies you. In some circumstances the Scheme Actuary may also be able to fulfil the purpose mentioned above using information which the Trustee has anonymised before sharing with them.

How to contact the other people we give your personal information to

Some of the people mentioned above just use your personal information in the way we tell them. However, others may make their own decisions about the way they use this information to provide their services, perform their functions, or comply with their regulatory requirements. In such a case, they have responsibilities as controllers in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them, too.

If you want any more information from any of the people who receive your personal information from the Trustee, or to exercise any rights in relation to the information they hold, please contact us and we will put you in touch with them.

How long we keep your personal information for

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Scheme and pay any benefits due to or in respect of you.

We keep your personal information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it. The majority of the personal information that we hold will be kept for a period of 75 years from the end of the Scheme year in which the last payment from the Scheme is made to or in respect of you.

However, some information may be kept for a longer or shorter period depending on how long we sensibly think we need it to deal with queries (from you or your beneficiaries/other persons who might ask us if they are entitled to payments), complaints (from you or them), and our legal obligations mentioned above.

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant.

To exercise these rights, please use the Trustee's contact details, which are set out below. The Trustee can also supply more information about these rights to you, on request.

The Trustee has agreed with each of the Trustee Advisers that the Trustee will be responsible for dealing with requests from you in respect of your rights if those requests relate to the use of your personal information described in this notice. This means if you wish to exercise rights against the Trustee, you should contact the Trustee using the details below. If you wish to exercise your rights against the other advisers in relation to the Scheme who are data controllers (such as the Scheme Actuary) for what they do with your personal information, you should contact the Trustee and we will be able to put you in touch with them.

Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Queries and further information

If you want more information about what we do with your information and what your rights are, the Trustee can be contacted at:

Christine Allen
AMG Chrome Limited
Fullerton Road
Rotherham
South Yorkshire S60 1DL
Tel: 01709 833 754
Email: pensions@amg-chrome.com

The Scheme administrator can be contacted at:

AMG UK Group Pension Plan
Aon
PO Box 196
Huddersfield HD8 1EG
Tel: 0330 678 1459 Overseas: +44 330 678 1459 (Monday to Friday 9am to 5pm)
Email : amg.pensions@aon.com

Information Commissioner's Office

If you have concerns about the way we handle your personal data, you can contact the Information Commissioner's Office or raise a complaint at <https://ico.org.uk/make-a-complaint/>, or call its helpline on 0303 123 1113.