



Charles Wells
BREWING FAMILY SINCE 1876

CHARLES WELLS DIRECTORS' PENSION SCHEME

Privacy Notice for Scheme Members

The Trustee Directors of the Charles Wells Directors' Pension Scheme hold and process personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we comply with relevant data protection legislation. The Trustee Directors are joint data controllers with the Scheme Actuary and this notice is issued on behalf of both the Trustee and the Scheme Actuary.

As data controllers, the Trustee Directors collect and process your personal data for the purposes of complying with their legal duties to administer the Scheme and for other legitimate purposes relating to the operation and management of the Scheme. This includes:

- Communicating with members in relation to their benefits, responding to requests and queries;
- General administration of the Scheme, including calculating, recording and paying of benefits;
- Meeting the Trustees' ongoing regulatory, legal and compliance obligations;
- Risk management purposes such as longevity modelling, managing the Scheme assets, insurance solutions, member option exercises (including pension increase exchange and transfer value exercises);
- Improving our processes and use of technology, including testing and upgrading of systems.

The Scheme Actuary, Mike Smedley FIA of Isio, will process data to assess scheme funding in line with pensions legislation. This notice is issued on behalf of both the Trustee and the Scheme Actuary. The individual Scheme Actuary may change from time to time and we will inform you of any changes in the Summary Funding Statement and member newsletter that is issued on a regular basis.

We describe in this notice the personal data which we collect about you and other people in connection with your membership of the Scheme, for example, personal data about your spouse, civil partner, partner or dependant. Legislation dictates personal data as any information that could be used to identify a living individual.

Who has provided this data?

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by Charles Wells Limited ('the Company'), other schemes from which members have transferred, from HMRC, the DWP and regulatory bodies and from tracing organisations.

We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member's death. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals.

What personal data do we hold?

We may collect, use or otherwise process the following types of personal data about you and, in some circumstances, about a spouse, civil partner, partner or dependant:

- name, gender, address, date of birth, NI number, contact details;
- bank account details and tax information including your marginal rate of income tax and any protections of tax allowances that you may have in relation to your pension benefits;
- information about your membership of the Scheme (for example date of joining, date of leaving, benefits and contribution details over this period);
- information about any other pension arrangements you have (for example, information which is relevant to the tax treatment of your benefits under the Scheme).

What special categories of data do we hold?

We also hold some special categories of, or "sensitive", data about members for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We will only hold this type of personal data where it is necessary for us to do so in order to properly perform our duties as Trustees. Should legislation require us to obtain your explicit consent we will seek this at the appropriate time.

Contact details

If you have any questions about this privacy notice please contact the Trustee Directors by using the following contact details:

Isio
c/o SPS
PO Box 163
Blyth
NE24 9GS

T: +44 (0) 330 135 8979

Email: ukfmcwells@isio.com

How long will your data be kept?

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to retain information relating to you until your membership of the Scheme ends.

We may keep your personal data until such point in the future as the Scheme may cease to exist. After 15 years from this point we may then decide to delete some of the data held in relation to you. However, information may be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

Isio will hold on to your personal data for 75 years after the termination of the contract with us. This is to protect themselves against any subsequent legal claims.

What is our legal basis for processing your personal data?

Under laws which are designed to protect your personal data, we need to have a legal basis each time that we use, share or otherwise process your personal data.

The Trustee has certain duties and powers which are conferred on it by law or by the Scheme's governing documentation. In most cases, the processing of your personal data is necessary so that the Trustee can perform those duties and exercise those powers (for example, to pay your benefits).

Certain uses of your personal data, or other processing activities, may not be strictly necessary for the Trustee to perform its legal duties and regulatory responsibilities, or to exercise its powers. However, it may be that certain uses of your personal data are necessary for the purposes of the Trustee's legitimate interests.

When we say "legitimate interests", we mean the Trustee's interests in operating the Scheme as properly, efficiently and securely as possible. For example, to manage matters associated with the provision of your benefits under the Scheme, including offering you choices as to the form or timing of those benefits.

The Scheme Actuary is appointed under pensions legislation and is required to undertake various tasks, primarily covering scheme funding.

Who else processes your data?

We share your personal data with certain third parties involved in running the Scheme, for example, Isio who are the Scheme's Administrators and Actuaries, Osborne Clarke who are the Scheme Lawyers and Nortons who are the Scheme auditors.

In some circumstances we are joint controllers with the Scheme Actuary, the legal advisers and auditors (who may process your data to comply with their professional duties as advisers to the Trustee) and the Company.

The Company holds your data to comply with its legal obligations as the sponsoring employer of the Scheme. It has a legitimate interest in the Scheme being run in an accurate and cost effective way and may have an interest in offering certain options to members in relation to the benefits provided under the Scheme. The Trustee may share information with the Company and its advisers for this purpose.

What if you have a complaint?

To make a complaint about how we have handled your information, contact us as set out above. If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office.

Its contact details are:

Telephone: 0303 123 1113

Website: <https://ico.org.uk/>

Transfers of personal data

We may share your personal data with the following categories of third parties:

- the Trustee's providers who manage any Additional Voluntary Contributions (AVCs) you have paid into the Scheme;
- other companies that provide services to the Scheme (or to its administrators), such as suppliers of data cleansing, verification and tracing services and information technology systems suppliers and support, including providers of data storage, email archiving, back-up, disaster recovery and cyber security services;
- regulatory bodies such as the Pensions Regulator and His Majesty's Revenue and Customs;
- advisers to the Company for the purpose of calculating or developing options in relation to the benefits to be provided; and
- financial advisers selected by the Trustee or by the Company, so that they are in a position to give advice to members in relation to any options in relation to benefits provided under the Scheme.

We will always ensure that any third parties with whom we share your personal data are subject to privacy and security obligations consistent with this privacy notice and applicable laws.

In certain circumstances, your personal data may be processed outside of the UK and the European Economic Area (the EEA). For example, third party service providers may store certain personal data in a country outside the UK and the EEA.

If we (or our service providers) process personal data outside of the UK and the EEA, we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this privacy notice, and in accordance with applicable laws.

Your rights

You have certain rights in relation to your personal data. Those rights will not necessarily apply in all cases or to all personal data which is processed by us. For example, certain rights will not apply where we need to process personal data to comply with our legal duties.

You have the right to request that we:

- Inform you about the collection and use of your personal data;
- provide you with access to or a copy of any personal data which we hold about you;
- update any of your personal data which is out of date or incorrect;
- delete any personal data which we hold about you;
- restrict the way that we process your personal data;
- consider any valid objections which you have to our use of your personal data;
- provide your personal data to a third party;
- provide you with information regarding automated decision making and profiling.

We will consider all requests (including whether they apply in a particular case) and provide our response within the time period stated by applicable law. We may ask you to provide us with some further information to allow us to confirm your identity.

As we mention above, you also have the right to:

- object to processing of your personal data, where we do so because it is in our (or a third party's) legitimate interests;
- withdraw your consent to the processing of your personal data, where you have previously given your consent to this.
- make a complaint to us if you have any concerns about how we process your personal data.

If you exercise your rights in relation to your personal data, it may affect our ability to properly administer Scheme and to pay your benefits under it.

Changes to this privacy notice

The data controllers may change this privacy policy from time to time.

Any changes we make in the future will be notified to you when we next communicate with you such as with the annual Summary Funding Statement and member newsletter.