

Humberclyde Finance Group Pension and Life Assurance Scheme

The Trustee of the Humberclyde Finance Group Pension and Life Assurance Scheme (the “**Scheme**”, “**we**”, “**our**”, or “**us**”) is committed to protecting your information and acting in accordance with your rights under data protection law.

This privacy notice contains information on what personal information about you the Scheme collects, what we do with this information, the lawful basis on which personal information is processed and what rights you have.

Collection of your information

We collect and process the following information about you:

- **Personal details:** your personal details such as your name, gender, date of birth, home address (including postcode), telephone number, e-mail address, national insurance number, bank account details (in some cases), marital status, dependants and country of residence;
- **Benefits information:** information relating to your benefits, such as your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings and pensionable earnings, the category and value of contributions and benefits that you have built up or receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- **Records of communications with you** (including any complaints);
- **Special categories of personal data:** in some cases, special categories of personal data such as your marital status or 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); and
- **Beneficiary information:** where applicable, we also collect information about your dependants, next of kin and any other nominated beneficiaries. Before providing us with any such information, you should provide a copy of the information in this privacy notice to those individuals. We assume that you have the authority to share any personal information you provide to us about them.

In some cases, we will collect personal information about you indirectly from the BNP Paribas entity which is (or was) your employer and from our service providers (e.g. the Scheme administrators, which currently are Barnett Waddingham and Fidelity International).

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;
- b) for general administration of the Scheme, such as: 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 and to prevent fraud;
- c) for meeting our ongoing 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;

- e) when we undertake activities from time to time to help us manage the liabilities of the Scheme, such as obtaining life insurance, longevity hedging, insuring Scheme liabilities with an insurer, scheme mergers, 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; and
- f) to comply with our legal obligations under the Pensions Dashboards Regulations 2022 to make your pension information available through qualifying pensions dashboard services that you choose to use (involving responding to “find” and “view” requests to confirm your membership and display your benefits information).

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

- (i) necessary for our **legitimate interests** in pursuing the purposes set out in (a) to (e) above, and (when we make the disclosures to BNP Paribas for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of BNP Paribas, such interests in each case not being overridden by your privacy interests; or in some cases, necessary for one of the legitimate interests formally recognised by the UK General Data Protection Regulation (“**UK GDPR**”), in which case no balancing of such interests with your privacy interests is required;
- (ii) required to meet our **legal or regulatory responsibilities**, such as disclosures to authorities, regulators or government bodies referred to below, and complying with our obligations set out in (f) above;
- (iii) necessary for the **performance of a task carried out in the public interest** and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and
- (iv) 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 allocate benefits or where the Scheme Rules require you to provide information which we cannot otherwise process without your consent.

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 or continue to use this personal data we may be unable to administer your benefits or record, calculate or pay your or your beneficiaries’ benefits.

The different ways in which we process your information alongside the legal basis for each of these processes is set out in the table below:

Purpose	Information	Legal basis
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	- Personal details - Benefits information - Records of communications with you - Beneficiary information - Special categories of personal data	<i>Legal obligation</i> This type of processing is necessary for the purposes of complying with legal requirements to which we are subject. <i>Legitimate interests</i> It is also necessary for our legitimate interests in discharging our obligations to you arising from the terms of the Scheme and in handling your requests and communications in relation to your benefits.

Purpose	Information	Legal basis
relation to transfers to other schemes		We will only process your personal data on the basis of these legitimate interests, if, in each case, the interest is not overridden by your interests or fundamental rights and freedoms. <i>Special categories of personal data</i> We will either process your special categories of personal data for the significant public interest in providing an occupational pension scheme or with your consent. If you provide your consent, you can withdraw it at any time.
General administration of the Scheme	• Personal details • Benefits information • Records of communications with you • Beneficiary information • Special categories of personal data	<i>Legal obligation</i> This type of processing is necessary for the purposes of complying with legal requirements to which we are subject. <i>Legitimate interests</i> It is also necessary for our legitimate interest in discharging our obligations to you arising from the terms of the Scheme. In addition, it is necessary for our legitimate interest in administering the Scheme on a day-to-day basis (e.g. recording and paying benefits; actuarial valuations; selecting member nominated trustees; reviews for statistical and reference purposes). We will only process your personal data on the basis of these legitimate interests, if, in each case, the interest is not overridden by your interests or fundamental rights and freedoms. <i>Recognised legitimate interests</i> We will also process your personal data to the extent that this processing is necessary for the detection, investigation or prevention of crime. <i>Special categories of personal data</i> We will either process your special categories of personal data for the significant public interest in providing an occupational pension scheme or with your consent. If you provide your consent, you can withdraw it at any time.
Meeting our ongoing regulatory, legal and compliance obligations, and investigating or preventing crime	• Personal details • Benefits information • Records of communications with you • Beneficiary information	<i>Legal obligation</i> This type of processing is necessary for the purposes of complying with legal requirements to which we are subject. <i>Recognised legitimate interests</i> We will also process your personal data to the extent that this processing is necessary for making disclosures of personal data in response to requests from bodies carrying out

Purpose	Information	Legal basis
	Special categories of personal data	public tasks, and the detection, investigation or prevention of crime. <i>Special categories of personal data</i> We will process your special categories of personal data for the significant public interest in the functions of relevant official or regulatory bodies, or investigating or preventing crime.
Improving our processes and our use of technology	- Personal details - Benefits information - Records of communications with you	<i>Legitimate interests</i> This type of processing is necessary for our legitimate interests in discharging our obligations to you arising from the terms of the Scheme, and in making the administration of the Scheme more efficient. We will only process your personal data on the basis of these legitimate interests, if, in each case, the interest is not overridden by your interests or fundamental rights and freedoms.
Undertaking activities from time to time to help manage the liabilities of the Scheme	- Personal details - Benefits information - Records of communications with you - Beneficiary information - Special categories of personal data	<i>Legitimate interests</i> This type of processing is necessary for our legitimate interests in managing the liabilities of the Scheme. We will only process your personal data on the basis of this legitimate interest, if the interest is not overridden by your interests or fundamental rights and freedoms. <i>Special categories of personal data</i> We will either process your special categories of personal data for the significant public interest in providing an occupational pension scheme or with your consent. If you provide your consent, you can withdraw it at any time.
Complying with our legal obligations under the Pensions Dashboards Regulations 2022	- Personal details - Benefits information	<i>Legal obligation</i> This type of processing is necessary for the purposes of complying with legal requirements to which we are subject.

Disclosures of your information

We typically share your information with the recipients set out in the table below:

Recipient	Information	Purpose
Suppliers		
Administrator (currently Barnett Waddingham and Fidelity International)	- Personal details - Benefits information - Records of communication with you	Day-to-day administration of the Scheme

Recipient	Information	Purpose
	- Beneficiary information - Special categories of personal data	
Additional Voluntary Contributions (“ AVC ”) provider (currently Fidelity International)	- Personal details - Benefits information - Beneficiary information - Special categories of personal data	AVC policies
Financial advisers and our appointed financial adviser for members (currently Origen)	- Personal details - Benefits information	Providing you with financial advice
Scheme Actuary (currently Aon Solutions UK Limited (“ Aon ”)) ¹	- Personal details - Benefits information - Beneficiary information - Special categories of personal data	Actuarial calculations
Scheme auditors (currently Crowe UK LLP)	- Personal details - Benefits information	Audit services for the annual report of accounts
AVC investment advice (currently Aon)	- Personal details - Benefits information - Records of communication with you - Beneficiary information - Special categories of personal data	Investment advice in relation to the Scheme
Risk Settlement advisers (currently Lane Clarke and Peacock LLP)	- Personal details - Benefits information - Beneficiary information	Risk settlement advice in relation to the Scheme
Legal adviser (currently Linklaters LLP)	- Personal details - Benefits information - Records of communication with you - Beneficiary information - Special categories of personal data	Legal advice in relation to the Scheme

¹ Aon is the appointed Scheme Actuary and acts as a data controller. Aon also provide some advice to the Bank in relation to the Scheme. More detail about Aon's use of your personal information is set out in their full Privacy Notice which is available online at <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>, or you can request a copy by contacting Aon, including reference to the Scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH.

Recipient	Information	Purpose
Providers of printing, communication and tracing services ²	• Personal details • Benefits information • Records of communication with you • Beneficiary information • Special categories of personal data	• Printing services • Communication services • Tracing members and beneficiaries
Other recipients		
BNP Paribas	• Personal details • Benefits information • Records of communication with you • Beneficiary information • Special categories of personal data	• Audit purposes • Corporate transactions initiated by BNP Paribas
Insurance and reinsurance companies	• Personal details • Benefits information • Beneficiary information • Special categories of personal data	• Carrying out the activities referred to in paragraph (e) of the section "How we use your information" above
Miscellaneous third parties	• Personal details • Benefits information • Records of communication with you • Beneficiary information • Special categories of personal data	• Exercising or protecting legal rights, including those of the Trustee or other stakeholders • Responding to requests from individuals or their representatives who seek to protect their legal rights or such rights of others (such as the Pensions Ombudsman)
Official and regulatory bodies		
Public authorities, regulators and government bodies (such as HMRC and the Pensions Regulator)	• Personal details • Benefits information • Records of communication with you • Beneficiary information	• Meeting legal, regulatory or other requirements • Complying with codes of practice or conduct

² 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.

Recipient	Information	Purpose
	Special categories of personal data	
Pensions dashboards service providers (including the Money and Pensions Service and technology providers that facilitate the dashboards connection).	- Personal details - Benefits information	Complying with our legal obligations under the Pensions Dashboards Regulations 2022

Transfers of your information abroad

The use and disclosure of your information, for the purpose referred to in (a) and (b) above, may involve processing of your personal information outside of the European Economic Area via data held on UK servers. Those countries include the Philippines and India.

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 ensure that the processing of information is protected in compliance with applicable data protection rules. To ensure an appropriate level of protection, we typically use 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 and copies of these agreements are available from us on request.

Retention of your information

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 retentions management 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. In general, we will keep your information for the life of the scheme plus 12 years.

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, to tell us that you do not wish to receive marketing information, and (in some circumstances) to require certain of your information to be transferred to you or a third party. To the extent the use of your information is based on your consent, you have the right to withdraw your consent.

You also have the right to object to our processing of your personal data. Where we process your personal data to comply with legal obligations (such as the Pensions Dashboards Regulations 2022), certain rights (such as the right to object or the right to erasure) may not apply because we are required by law to carry out that processing.

If you have any questions or wish to exercise any of the above rights, or if you are unhappy with how we have handled your personal data, you may send an email to pensionandbenefits@uk.bnpparibas.com. We encourage you to contact us in the first instance, so that we have the opportunity to address your concerns.

If you are not satisfied with our response to your complaint specifically concerning your personal data, you can also make a complaint about our processing of your personal data with the **ICO** using their online service at: <https://ico.org.uk/make-a-complaint/data-protection-complaints/> or, if you are no longer resident in the UK, the relevant data protection authority in your country of residence.

The ICO's address:

*The ICO,
Wycliffe House,
Water Lane,
Wilmslow, SK9 5AF*

Helpline number: 0303 123 1113

Website: <https://ico.org.uk/make-a-complaint/>

Further information required to carry out requests

In some cases, it will 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.

Status of this privacy notice

This privacy notice was last updated on 1 June 2026.

This document is a notice to you and not a contract between us. It may be subject to amendments. Any future changes or additions to the processing of personal data as described above in this privacy notice affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

The Trustee of the Humberclyde Finance Group Pension and Life Assurance Scheme

BNP Paribas Leasing Solutions
Northern Cross
Basing View
Basingstoke
Hants
RG21 4HL

Contact: *BNP Paribas Group Pension Team (pensionandbenefits@uk.bnpparibas.com)*