

One Stop Stores Pension Scheme: Privacy Notice

1 The purpose of this privacy notice

1.1 The Trustee of the One Stop Stores Pension Scheme (the “Scheme”, “we”, “our” or “us”) recognises the importance of looking after your personal information. We are committed to holding and using your information safely and securely, in line with UK data protection laws.

1.2 This privacy notice contains information on: what personal information about you and your beneficiaries the Scheme collects; how and why we hold and use this information; when we will share your personal data with other people; and what rights and choices you have when it comes to your personal data.

2 What information the Scheme collects about you

2.1 We collect and process the following information about you:

2.1.1 your personal details such as your title, name, gender, date of birth, home address, telephone number, e-mail address, national insurance number, bank account details (in some cases) and country of residence;

2.1.2 information relating to your benefits, such as your membership number, the date you joined or left the Scheme, your earnings (if applicable), the value of your contributions, the category and value of benefits that you have built up or received, your target retirement date, and any relevant matters impacting your benefits, such as additional voluntary contributions, transfers-in, pension sharing or earmarking orders and any tax protections or other adjustments;

2.1.3 records of communications with you (including any complaints); and

2.1.4 in some cases, special categories of personal data, such as your marital status or information about your health (e.g. in the case of ill-health early retirement applications).

2.2 We must collect and use personal information about you, in order to administer your Scheme benefits. We collect this information from you, your current or former employer(s), other entities in the Tesco Group, the Scheme’s administrators (currently, Standard Life), HMRC, the Department for Work and Pensions, regulatory bodies, our medical advisors, address tracing organisations and trustee support service providers (e.g. Quantum Advisory).

2.3 Where applicable, we also collect information about your 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.

3 How and why we use your information

3.1 We use your information for the following purposes:

3.1.1 communicating with you about your benefits and contributions, handling transfer requests, buying annuity policies, allocating death benefits, dealing with complaints, and disclosing information to third parties at your request (e.g. in relation to transfers to other pension schemes);

3.1.2 for general administration of the Scheme, such as: to record and pay benefits; for Scheme audits or reviews conducted for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (e.g. address tracing activities should we be unable to contact you or to prevent fraud);

3.1.3 for meeting our ongoing regulatory, legal and compliance obligations, including assisting with investigations or the prevention of crime;

3.1.4 to test and upgrade our processes, systems, products, services and use of technology, to improve Scheme administration; and

3.1.5 to undertake activities from time to time to help us manage the Scheme in a cost-effective way and ensure good value for members. These activities could include buying annuity policies, Scheme mergers, bulk transfers of benefits to an insurer, master trust or other pension arrangement, including (where relevant) disclosures to advice providers to allow you to obtain financial advice.

3.2 Data protection laws allow us to use your information in the ways described above because it is:

3.2.1 necessary for our legitimate interests in pursuing the purposes set out above or for the legitimate interests of One Stop Stores Limited, part of the Tesco Group (“One Stop”) in prudential management and meeting accounting and regulatory requirements, subject in each case to any overriding privacy interests that you have;

3.2.2 required to meet legal or regulatory responsibilities, such as disclosures to authorities, regulators, courts or government bodies;

3.2.3 in some cases, necessary for the performance of a task carried out in the public interest;

3.2.4 when we use special categories of personal data, necessary for making a determination in connection with eligibility for, or benefits payable under, the Scheme (where authorised under local or EU law), for preventing fraud or other unlawful acts, for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and

3.2.5 in limited circumstances, processed with your consent. We may obtain this from you from time to time, such as when we consider requests by you to access your benefits on the grounds of ill-health (which may require us to consider information - with your consent - about your medical condition), when you ask us to make disclosures or allocate benefits, or where the Scheme rules require you to provide information which cannot otherwise be processed without your consent.

3.3 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 administer your contributions and benefits or to record, calculate or pay your or your beneficiaries' benefits.

4 Sharing your information

4.1 We may share your information with the following recipients:

4.1.1 our suppliers, including:

- (i) Standard Life, who help us to administer the Scheme;
- (ii) our professional advisers to obtain legal, audit, secretarial, medical and investment consultancy advice (e.g. Quantum Advisory, Linklaters and Deloitte); and
- (iii) other providers of services to us and One Stop, such as administrators, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), and printing, communication, IT and hosting, marketing and tracing providers;

4.1.2 One Stop and other members of the Tesco Group, such as for audit purposes, project management services or in relation to corporate transactions initiated by the Tesco Group;

4.1.3 insurance and reinsurance companies (e.g. Legal & General), such as when we carry out the activities referred to in 3.1.5 above;

4.1.4 public authorities, regulators, government bodies or courts, 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

4.1.5 other persons from time to time, when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

5 Transfers of your information overseas

The use and disclosure of our information, including for the purpose referred to in 3.1.5 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 will ensure that the transferred information is adequately protected. For example, by putting in place an appropriate data transfer agreement.

6 How long we keep your information

6.1 We aim to keep all personal data secure and to only hold it for as long as (and to the extent that) we need it. We keep your personal information, and records about you, to meet our legal and regulatory obligations and to be able to administer the Scheme. Therefore, how long we keep this information will vary.

6.2 We may be required to keep some of your personal information for the rest of your life, so that we have the information we need to pay your benefits and to answer queries relating to your benefits (e.g. whether you are still a member of the Scheme).

6.3 We review the personal data held in relation to the Scheme from time to time, to check that what we are doing complies with applicable laws and regulations. If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

7 Your rights

7.1 Under data protection laws, you have rights of access to, rectification and/or deletion 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.

7.2 You also have the right to object to our processing of your personal data, and to tell us that you do not wish to receive marketing information.

7.3 To the extent that the use of your information is based on your consent, you have the right to withdraw your consent.

7.4 If you have any questions or wish to exercise any of the above rights, you may send an email to 0026-Pensions@onestop.co.uk. You can also use this e-mail address if you wish to make a complaint about how we process your information.

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

8 Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as to carry out your request: for a transfer; to retire early on grounds of ill-health; or to receive certain lump sums. We will notify you when further information is required for any such purposes.

9 Status of this privacy notice

This privacy notice was last updated on 21st November 2019. It is non-contractual. We reserve the right to amend it from time to time, and we will take appropriate steps to bring any material amendments to your attention.

One Stop Stores Trustee Services Limited

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