

## **Weidmuller UK Group Pension Plan (the "Scheme") Privacy Notice**

This notice explains how Weidmuller Pension Trustees Limited (the "Trustee") of the Weidmuller UK Group Pension Plan "Scheme" uses and protects the personal data that it holds about members and other beneficiaries of the Scheme. Contact details for the Trustee are set out at the end of this notice. In this notice, the words "we", "us" and "our" refer to the Trustee.

The Trustee is a "controller" for the purposes of the data protection laws. The current data protection laws are set out in the General Data Protection Regulation ("GDPR"), which was effective from 25 May 2018. We refer to the GDPR as the "Data Protection Laws" in this privacy notice.

You should share this notice with your family and dependants where you have provided us with personal data about them. The Trustee considers that Klippon Electricals Limited, HT Electricals Limited and Weidmuller Limited are or have been sponsoring employers "Employer" of the Scheme.

### **What is personal data?**

Personal data broadly means information that identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual.

This includes any information provided to us by or on behalf of you, your Employer or HM Revenue & Customs in relation to your actual, past or potential membership of the Scheme.

### **What types of personal data might we hold about you?**

We will collect and process the information about you that you provide by filling in forms and by corresponding with us or our advisors by telephone, email or otherwise. We will also collect and process information about you that is provided to us by your employer, personal financial adviser or by HM Revenue & Customs.

We may hold and process any or all of the following personal data about you:

- personal details such as your name, gender, age, date of birth, contact details (e.g. your address and postcode, email, telephone and mobile numbers), and identifiers such as your National Insurance number, pension or member reference number and employee number (where applicable);
- details of your family, lifestyle and social circumstances. This could include details about your current marriage or civil partnership, any previous relationships and details of your family and dependants;
- employment details such as your earnings, length of service and employment;
- other financial details such as about any other income, other pension arrangements, bank account details (e.g. to process pension payments) and tax code; and
- information about your physical or mental health (where there is a legal basis for the processing of such data under the Data Protection Laws – see below).



## **Why do we hold this information?**

We hold this information because we need it to administer the Scheme. Without your personal data, we cannot provide you and your dependants with the correct benefits, at the right time. For example, we may need this information to verify your membership of the Scheme, to calculate your pension or to assess whether you are entitled to a specific benefit or how the tax rules apply to you.

We may use unique identifier information, such as your National Insurance number, pension or member reference number and employee number (where applicable) for the purposes of sending communications to you and verifying your identity.

In some instances, we may need to hold and process information relating to your physical or mental health, for example if you are applying for a pension on grounds of ill-health. We will ask for your explicit consent to this, unless there is an alternative legal basis for processing this information under the Data Protection Laws. Once you have given your consent, you can withdraw it at any time by writing to us using the contact details below although this might affect the benefit you are seeking.

## **Using your information in accordance with Data Protection Laws**

Data Protection Laws require us to meet certain conditions before we are allowed to use your personal data in the way described in this privacy notice. The legal basis for our use of your personal data will generally be one or more of the following:

- We rely on a condition that allows us to use your personal data to comply with our legal obligations as Trustee of the Scheme in relation to the Scheme.
- We also rely on a condition known as 'legitimate interests' of administering and managing the Scheme and the liabilities under it calculating, securing and paying benefits; and performing our obligations and exercising any rights, duties and discretions the Trustee has in relation to the Scheme in order to use this information in the way described in this privacy notice. We have a legitimate interest in collecting and processing your personal data as we need this to administer the Scheme and to provide benefits for you and your dependants.
- The processing of your personal data is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract

We will keep the amount of personal data collected and the extent of any processing to the minimum required. We do not provide or sell this information to any parties that have not been authorised by the Trustee to legally process your information for the above purpose.

We will only process 'sensitive' or 'special categories' of personal data under the Data Protection Laws (e.g. information about your health) where you have explicitly consented to this or where there is an alternative legal basis for processing this information under the Data Protection Laws. This may mean that you will be asked to sign consent forms in the future. If you don't consent to our processing this information when asked to do so, it may mean that we are unable to pay benefits to you or your dependants. Once you have given your consent, you can withdraw it at any time by writing to us using the contact details below.

## **What do we do with the information?**

We may use your personal data for a number of purposes relating to the administration of the Scheme, including the following:

- to calculate and pay benefits. This includes providing you with details of your benefits and options under the Scheme and dealing with any queries that you have about these;
- to carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information, benefits and services that you request from us;
- to notify you about services provided to members of the Scheme and any changes to those services or to enable you to access those services;
- for statistical, financial modelling and reference purposes;



- for internal record keeping;
- for risk management purposes, including the insurance or management of longevity risks and related demographic risks;
- complying with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by any relevant regulators, government departments and law enforcement or tax authorities or in connection with any disputes or litigation;
- in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of Weidmuller Limited, the current sponsoring employer's business.

### **How long do we keep your personal data for?**

We will hold your personal data on our systems for as long as is necessary for the Scheme to provide benefits to you or your dependants.

So, for example, if your pension is paid from the Scheme when you retire, we will hold your data for the rest of your life, until your pension ceases on your death. If a pension is payable to any of your dependants after your death, we will continue to hold your data until their pensions cease. We will also continue to hold your data for an appropriate period (to be kept under review) after all benefits payable to you and your dependants have ceased, in case there are any further queries about your membership of the Scheme and to deal with any questions, complaints or claims that we may receive about our administration of the Scheme.

If you cease to be a member of the Scheme (e.g. because you transfer your benefits to another pension arrangement), we will hold your data for as long as you are a member and for so long after you cease to be a member as may be required in case any further queries arise about your membership of the Scheme and to deal with any questions, complaints or claims that we may receive about our administration of the Scheme.

We may also retain your data for a longer period to comply with our legal and regulatory obligations.

### **Who do we share your personal data with?**

We share your data with the Scheme's administrator, which is currently Capita Employee Solutions "Capita".

Where required for the purposes of administering the Scheme, we may also share your personal data with:

- the Scheme's service providers, professional advisers and auditors. This includes the Scheme actuary (which is currently James McCoy and his employer Capita Employee Solutions). It also includes the Scheme's legal adviser, auditor, insurers, investment consultant, investment managers, banks and other organisations which advise the Trustee;
- any financial adviser or other organisation appointed by the Trustee or Weidmuller Limited to advise you about your options under the Scheme or any adviser appointed by you where you have asked us to provide them with details of your benefits under the Scheme;
- Weidmuller Limited (sponsoring employer) and their professional advisers;
- regulators, government departments, law enforcement authorities, tax authorities and insurance companies;
- any relevant ombudsman, dispute resolution body or the courts; and
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of Weidmuller Limited.

Some of these entities may also be controllers under the Data Protection Laws. They may be obliged under the Data Protection Laws to provide you with additional information regarding the personal data that they hold about you and how and why they process that data. Further information may be provided to you in a



separate notice or may be obtained from the advisers and service providers direct, for example, via their websites. However in the first instance you should contact the Trustee using the contact details below if you have any queries.

Whenever one of our advisers or service providers acts as a joint controller with us in respect of your personal data, because we jointly determine the purposes and means of processing it, we will agree with them how we are each going to meet our respective and collective obligations under the Data Protection Laws. If you would like more information about how such an arrangement works, please contact us.

In addition, where we make Scheme investments or seek to provide benefits for Scheme members in other ways, such as through the use of insurance or pension scheme mergers, then we may need to share personal data with providers of investments, insurers and other pension scheme operators. In each case we will only do this to the extent that we consider the information is reasonably required for these purposes.

The advisers, service providers and organisations referred to in the paragraphs above may use personal data to perform their functions as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties (for example, insurers may pass personal data to other insurance companies for the purpose of obtaining reinsurance), to the extent they consider the information is reasonably required for a legitimate purpose.

### **Where we store your personal data**

The data that we collect from you will usually be stored inside the UK or the European Economic Area (EEA).

However, if you live or work outside of the UK or the EEA, we may need to transfer your personal data outside of the UK or the EEA to respond to any queries that you may have. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

We also may transfer personal data outside the UK or the EEA where the Scheme's service providers, professional advisers or auditors host data outside the UK or the EEA. Where we do this, we will ensure that the transfer is to a country covered by a decision of the Commission of the European Union or is otherwise made in circumstances where we have put appropriate safeguards in place to protect your data in accordance with the Data Protection Laws.

### **Your rights in relation to your personal data**

The accuracy of the data that we hold about you is important to us. If any of the personal data that we hold is inaccurate or out of date, please let us know using the contact details set out at the end of this notice.

You have a number of rights under the Data Protection Laws in relation to the way we process your personal data, namely:

- to access your data and obtain a copy of your personal data that we hold about you;
- to have your data rectified if it is inaccurate or incomplete;
- in certain circumstances, to have your data deleted or removed;
- in certain circumstances, to restrict the processing of your data;
- in certain circumstances, to object to the processing of your personal data (for example, you can object to processing your personal data based on the legitimate interest identified above).
- a right of data portability, namely to obtain and reuse your data for your own purposes across different services;
- to object to direct marketing (although we do not carry out direct marketing);
- not to be subject to automated decision making (including profiling), where it produces a legal effect or a similarly significant effect on you (we do not use automated decision making); and

- to claim compensation for damages caused by a breach of the Data Protection Laws.

If you wish to exercise any of these rights, please contact below section on "Contact us". You can obtain further information about these rights from the Information Commissioner's Office (ICO) at: [www.ico.org.uk](http://www.ico.org.uk) or via its telephone helpline (0303 123 1113).

We will respond to any request received from you within one month from the date of receipt of your request. There may be circumstances where we need more time to process your request. If so, we will let you know within one month from your request that we need more time to process your request. Access to your data will usually be provided free of charge, although in certain circumstances we may make a small charge where entitled to do so under the Data Protection Laws.

Please note that we may be unable to delete or remove your data whilst we still need this to administer the Scheme – see the section 'How long do we keep your personal data for?' above.

### **Any complaints?**

If you are not happy with the way in which your personal data is held or processed, please contact us using the details below. You also have the right to complain about data protection matters to the Information Commissioner's Office (ICO). We would appreciate the opportunity to resolve any issues that you might have prior to you contacting ICO although this is your choice.

The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (<https://ico.org.uk/>). The ICO can be contacted by calling 0303 123 1113.

### **Changes to this privacy notice**

This privacy notice is current as at November 2019. We keep our privacy notice under regular review, and may change it at any time. We will tell you about any significant changes.

### **Contact us**

If you have any queries about this privacy notice, or wish to exercise any of the rights above or indeed have any other questions about the Scheme please contact: The Pension Trustee, Weidmuller UK Group Pension Plan, c/o Capita Employee Solutions, PO Box 555, Stead House, Darlington, DL1 9YT or by email to [Weidmuller@capita.co.uk](mailto:Weidmuller@capita.co.uk) or Capita on 01227 773914.

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