

## EATON UK PENSION PLAN (THE "PLAN")

### PRIVACY NOTICE

Eaton UK Pension Plan Trustee Limited, the trustee of the Plan (the "Trustee") is committed to protecting and respecting your privacy. This Privacy Notice explains the types of personal information we collect, how we use that information and who we share it with in order to properly manage and administer the Plan, and also sets out how we protect that information.

Please read the following carefully to understand our practices regarding your personal information and how we protect your rights under data protection law.

#### Who we are

We, the Trustee, are the "data controller" for the purposes of the data protection legislation. Our registered address is 4 Shire Park, Welwyn Garden City, AL7 1TW, registered number 09992203. The Trustee's representative is WTW, the Plan administrator, who may be contacted about any data protection questions you have on [eatonpensions@wtwco.com](mailto:eatonpensions@wtwco.com) or on 01707 607603.

#### Information covered by this Privacy Notice

This Privacy Notice covers all personal information collected and used by us. "Personal data" or "personal information" means information that enables you to be identified as an individual or recognised directly or indirectly.

#### What information do we collect from or about you?

We collect and use the following information about you:

- personal details, such as name, date of birth, gender, postal address, email address, phone number, bank details, HMRC details, identifiers such as national insurance number, passport number and your employee number;
- family, lifestyle and social circumstances such as details about your current marriage, civil partnership or relationship status, marital or relationship history, details of your family, spouse, partner, dependents and potential dependents;
- details of your legal or personal representatives and the executor and beneficiaries of your will;
- records of communications with you (including complaints, and Member Nominated Director ballot votes);
- financial details such as you or your family members' or dependant's income, salary, assets and investments, bank account details to process pension payments, state benefits, grants and insurance details; and
- Plan membership details such as member identification number, pensionable pay, length of service, employment and career history, benefit entitlements under the Plan, and any relevant matters impacting your benefits such as additional voluntary contributions, pension sharing orders (including information in divorce or dissolution certificates) and tax protections.

Some of the personal information you provide may be "special category personal information", such as details about your physical or mental health in the case of ill-health early retirement. In these circumstances, you will be asked to complete a consent form. This will enable the Trustee to process your sensitive personal information for the purposes set out in the consent form.

#### Technical information that we may collect about you

When you visit our website, [www.eatonukpensionplan.co.uk](http://www.eatonukpensionplan.co.uk), we may collect the following:

- technical information, including browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times, and download errors;
- information about your visit, including the websites you visit before and after our website;
- length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers) and methods used to browse away from the page.

You can find more information about the types of technical information that we collect about you in our Cookies Policy which can be found at <https://www.eatonukpensionplan.co.uk/eukpp/cookies.aspx>

### **Information we receive from other sources**

We receive information about you from third parties; for example your current, former or prospective employer.

We may also collect information from anyone entitled to benefit under your membership of the Plan, such as your next of kin or (with your consent) from registered medical practitioners.

We may also obtain your personal information through the use of third party tracing services where we believe that we hold inaccurate data for you. We may also obtain data from a variety of other sources including public databases and government or regulatory bodies.

### **How we use your information**

We use your information for the following purposes:

- a. communicating with you in relation to the Plan, including any changes to your benefits and contributions and provide you with a copy of member newsletter Plan Ahead from time to time;
- b. for general administration of the Plan, including: to record and pay benefits; for actuarial valuations; 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 or to prevent fraud;
- c. to process Trustee nominations;
- d. for meeting our ongoing regulatory and compliance obligations, or to comply with any applicable legal or regulatory reporting or disclosure requirements;
- d. to monitor and 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 Plan; and
- e. when we undertake activities to help us manage the liabilities of the Plan, including (for example):
  - insuring your Plan benefits with one or more insurance companies;
  - sharing data with administrators for liability management exercises (for example, if we decided to offer you transfer values or to exchange future pension increases); and
  - sharing data with advice providers so that you can choose to receive financial advice in relation to liability management exercises.

### **Our legal basis for using your information including how we share it**

Under the data protection laws, data can only be processed if the processing is necessary for one or more specified grounds. Our use of your information as described above is permitted by applicable data protection law because it is:

- necessary for our legitimate interests in pursuing the purposes set out in (a) to (e) above;

- necessary to comply with the Trustee's legal obligations under the Plan's trust deed and rules and under pensions legislation to provide members with their promised benefits or to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below
- when we make the disclosures to a sponsoring employer (i.e. an employer with responsibilities for meeting the liabilities of the Plan – this is typically a company that is part of Eaton Group or is a former member of the Eaton Group) for the audit and corporate transaction purposes referred to below, necessary for that sponsoring employer's legitimate interests in meeting regulatory responsibilities and conducting proper operational management;
- necessary for the performance of a task carried out in the public interest;-
- when we use special categories of personal data:
  - i. necessary for making a determination in connection with eligibility for, or benefits payable under, the Plan (where authorised under local or UK law);
  - ii. for preventing fraud or other unlawful acts
  - iii. for establishing, exercising or defending legal claims; or
  - iv. where the data has been manifestly made public by you; and
  - v. used 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 Plan rules require you to provide information which we cannot otherwise use without your consent.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to record or pay your or your beneficiaries' benefits.

### **Who we share your personal information with**

We share some or all of your personal information with third parties, where it is necessary to administer the Plan and/or comply with contractual obligations relating to it.

We typically share your personal information with the following organisations:

#### **1. The Plan's administrator**

We have appointed WTW as administrator for the Plan. WTW carries out the pensions administration services on behalf of the Trustee and will require access to your personal information in order to calculate and pay benefits under the Plan. It will also perform other activities such as responding to requests or complaints and providing information to members, and so will require access to your contact details and Plan information. WTW will process your personal information on our behalf as our data processor.

#### **2. Eaton Limited as the principal employer of the Plan and other group companies**

Your personal information will only be shared with these entities to the extent that this is necessary for the administration of your pension benefits and for them to meet their legal obligations (including preparing and obtaining a third party audit of their financial statements and fulfilling their commitment to funding the Plan).

#### **3. Other third party service providers**

- (a) We share your personal information with our other service providers who help us administer the Plan, such as WTW (as providers of administration services) and other providers of services to us and them, such as the Plan Secretary (for governance services), payroll providers (to record and pay benefits), and printing, communication, IT and hosting and tracing providers. Where we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure;

- (b) The scheme actuary, WTW (for actuarial calculations). Actuaries are also data controllers and WTW have asked us to include a link to their privacy notice as follows:

<https://www.wtwco.com/en-gb/notices/how-willis-towers-watson-uses-personal-data-for-actuarial-services-to-uk-pension-scheme-trustees>

- (c) Other third party service providers such as auditors, investment consultants, investment managers, legal advisers and insurers may also process personal information on our behalf as data processors or data controllers. We ensure that your information is kept secure by checking that their security measures are adequate and by entering into agreements with such third parties which specify that they must only process personal information on our behalf and according to our instructions.

#### **4. Third parties permitted by law**

- (a) We disclose and share your personal information (in order to comply with legal or regulatory obligations) to:
- (i) local or foreign regulators, governments and law enforcement authorities;
  - (ii) local and foreign courts, tribunals and arbitrators or other judicial committees.
- (b) We may also disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend your rights or those of the public.

#### **5. Third parties connected with business transfers**

We may transfer your personal information to third parties in connection with a reorganisation, restructuring, merger, acquisition, sale or transfer of assets, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Notice.

#### **6. Other third parties**

A person appointed to act on your behalf by The Department of Work and Pensions, by the Court of Protection or under a power of attorney.

Any personal information held by us and any third party will be treated as confidential. We will not sell your personal information to third parties.

#### **Where we store your personal information**

The personal information that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom (UK) (for example, in the USA). It may also be processed by staff operating outside the UK who work for us or for one of our service providers (for example, WTW outsource some processing to Mumbai in India and Manila in the Philippines). We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice and applicable data protection laws as set out below.

#### **How do we keep your personal information secure?**

As part of our security measures, we may sometimes require you to give proof of your identity before we disclose personal information to you.

##### Password protection

Where we have given you (or where you have chosen) a password which enables you to access the ePA (the Fund administrator's online administration site), you are responsible for keeping such password confidential. We ask you not to share the password with anyone. The ePA system has minimum password requirements which you will need to comply with. HM Government's National Cyber Security Programme recommends

making your password stronger by using three random words, and numbers/symbols if needed. Please avoid using the same password for multiple online accounts.

If you are using a computer or terminal in a public location, we recommend that you always log out and close the website browser when you complete an online session for your security.

### Transfers of your personal information

We may transfer, store, or process your personal information at a destination outside the UK. Where the countries to which your personal information is transferred may not offer an equivalent level of protection for personal information to the laws of the UK, we will take reasonable steps to ensure that your personal information is treated securely and in accordance with this data protection policy. This may include entering into data transfer agreements based on 'standard contractual clauses', 'model clauses' or international transfer agreements (IDTA), as approved by the UK data protection regime, to ensure that third parties to whom we transfer personal information in those countries nevertheless commit to ensuring an adequate level of protection for your personal information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the safety of your personal information transmitted to our website; any transmission is at your own risk. Once we have received your personal information, we will use reasonable procedures and security features to try to prevent unauthorised access.

### **Your rights**

You have rights in relation to the personal information we hold about you. You have the legal right to request details of the personal information that we hold about you, to ask us to stop processing your information where you have previously consented to us doing so, to have it corrected or deleted in certain circumstances, and not to be contacted by us if you do not wish to be.

- Your right to access the information we hold about you

You can request access to the information we hold about you by contacting us using the contact details set out below. Our file of your information will usually be made available to you within 30 days, although occasionally we may not be able to give you access to the personal information we hold about you (for example, we may not be able to give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety). Please note that we may apply an administrative charge for providing access to your information in certain circumstances. Any such charge will be reasonable and we will advise you of the charge and obtain your consent before providing you with access to your personal information. Please note that if you request a copy of your data using electronic means (such as email), then we will provide a copy of your information in electronic form unless you ask us to do otherwise.

- Your right to have your information corrected or deleted

If any of the information we hold about you is inaccurate or out of date, such as the information included in your benefit statement, or you would like it deleted, please email your request to [eatonpensions@wtwco.com](mailto:eatonpensions@wtwco.com) and we will consider your request as soon as possible.

- Your right to object to us processing your personal information

Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.

- Your right to restrict processing of your personal data

You have the right to restrict our processing of your personal information where you believe such data to be inaccurate, our processing is unlawful or that we no longer need to process such data for a particular

purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.

- Your right to have your personal information transmitted to another organisation

Where we hold personal information about you that you have provided to us or that has been generated by your activity as a member of the scheme, and we hold this information with your consent, or for the performance of a contract with you, you have the right to ask us to provide you with the personal information we hold about you in a structured, commonly used and machine-readable format and, where technically feasible, to transmit that personal information to another organisation.

- Your right to withdraw consent to your data being processed

If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge.

- Your right not to be subject to automated decision making, including profiling

The Plan does not undertake automated decision-making or profiling with legal or similarly significant effects.

- Your right to complain if your data protection rights are violated

You can complain to your local data protection authority (the Information Commissioner's Office (ICO) in the UK), or to a court of law, if your data protection rights are violated. Contact details for the ICO are set out towards the end of this Privacy Notice. You may be entitled to claim compensation as a result of unlawful processing of your personal information.

Please note that we may apply an administrative charge for providing access to your information in limited circumstances. Any such charge will be reasonable and we will advise you of the charge and obtain your consent in advance.

If you would like to exercise any of your rights described above, please let us know by emailing us at [eatonpensions@wtwco.com](mailto:eatonpensions@wtwco.com).

### **How long do we keep your personal information?**

Your personal information is stored by us and/or our service providers, strictly to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws and other legal or regulatory requirements. In the context of providing pension benefits, this period can be extensive, and may continue for up to 15 years after the Plan is wound up. Any information would be removed from our systems and records or anonymised in accordance with applicable data protection laws and the Trustee's data retention policy, as amended from time to time.

### **Making a complaint**

We would be happy to address any concerns you have directly in the first instance. Should you have a need to escalate your complaint, you have the right to lodge a complaint with the UK data protection authority:

Information Commissioner's Office  
Wycliffe House  
Water Lane, Wilmslow  
Cheshire, SK9 5AF

Tel. +44 303 123 1113

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

## **Changes to this Privacy Notice**

We may update this Privacy Notice from time to time in response to changing legal, regulatory or operational requirements. We will notify you of any such changes (including when they will take effect). Your continued participation in the Plan after any such updates take effect will constitute acceptance of those changes.

## **Contacting us**

If you have any questions or concerns about how we treat your personal information, you wish to ask us to stop processing your personal information, or you would like to request a copy of the personal information we hold about you, please contact us at [eatonpensions@wtwco.com](mailto:eatonpensions@wtwco.com) or by writing to us at:

Eaton UK Pension Plan  
WTW  
PO Box 545  
Redhill  
RH1 1YX

Please include your reply address when you write to us.

14 March 2024