

Trustee of the AT&T ISTEEL Pension Plan: Fair Processing Notice



1 INTRODUCTION

- 1.1 Your privacy is important to us. We will process your personal data in accordance with applicable data protection law and as explained in this 'fair processing notice' (also sometimes referred to as a 'privacy notice').
- 1.2 The data controller in respect of the personal data you submit to us either directly or via the scheme administrator (Capita) or sponsoring employer (AT&T ISTEEL) is the AT&T ISTEEL Pension Trustee Limited (the "**Trustee**" or "**we**") as the Trustee of the AT&T ISTEEL Pension Plan (the "**Plan**"). This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this fair processing notice. We use your personal data to administer and manage your pension and (at the appropriate time) to pay you or any person in respect of you the benefits provided by the Scheme.

2 DATA PROTECTION PRINCIPLES

- 2.1 We will comply with data protection law, which says that the personal information we hold about you must be:
- (a) used lawfully, fairly and in a transparent way;
 - (b) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
 - (c) relevant to the purposes we have told you about and limited only to those purposes;
 - (d) accurate and kept up to date;
 - (e) kept only as long as necessary for the purposes we have told you about; and
 - (f) kept securely.

3 WHY DO WE PROCESS YOUR PERSONAL DATA?

- 3.1 We process the personal data that you provide to us for the purpose of administering and managing your pension and paying you and/or your spouse and dependants benefits.
- 3.2 Therefore, we process your personal data on one or more of the following bases (as relevant to you):
- (a) on the legal basis that the processing is necessary for the performance of the contract of employment between you and AT&T ISTEEL regarding your participation in the Plan;
 - (b) to comply with our legal obligations (including pursuant to the Pensions Schemes Act 2021 and Pensions Dashboards Regulations 2022); and / or

- (c) further to our legitimate interests as Trustee of the Plan (i.e. to effectively operate, administer and audit the Plan; prevent fraud; keep our records up to date and any other legitimate interests that we may identify, provided always that your interests and fundamental rights do not override those interests).
- 3.3 If you do not provide us with the personal data that we specify is required for administration of the Plan, then we may not be able to administer the benefits provided by the Plan.
- 3.4 Please note, in order to comply with our legal obligations in respect of statutory transfers, we may request further personal data from you, such as employment status and history, salary, pension contribution information, tax status and history, overseas residency and history and driving licence identification number (UK or overseas), so that we can establish an employment link to the scheme and/or overseas residence and mitigate the risk the transfer may be part of a pension scam. When complying with this legal obligation, we may also process personal data of certain third parties incidental to providing evidence of an employment link to a transferee scheme or overseas residence.

4 CHANGE OF PURPOSE

- 4.1 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 4.2 Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 WHAT INFORMATION DO WE HOLD ABOUT YOU

- 5.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the person's identity has been removed (anonymous data).
- 5.2 There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health, sexual orientation or criminal convictions.
- 5.3 We will collect, store and use the following categories of personal information about you:
- (a) **Identity Data:** such as first name, last name, maiden name, marital status, date of birth, national insurance number, and gender,
 - (b) **Contact Data:** such as postal address, email address, and telephone number; and
 - (c) **Financial Data:** such as bank account details, past activity relating to the Plan, information relating to contributions or benefits under the Plan, your status as a Plan member, and information relating to your tax band.
- 5.4 We may also collect, store and use special category data such as health data where necessary in the case of ill-health early retirement, ill-health reviews and where incapacity or similar reasons determine the benefits paid out.

6 HOW DO WE COLLECT PERSONAL INFORMATION?

- 6.1 As well as collecting it directly from you, we may receive your personal data from other sources, including, but not limited to:
- (a) from Members and Beneficiaries (or their IFA) directly;
 - (b) from a Member's employer;
 - (c) from expression of wish forms completed by the Member;
 - (d) from information provided in relation to potential beneficiaries on the death of a Member;
 - (e) from track and trace services; and
 - (f) from HMRC and other law enforcement agencies.

7 SENSITIVE PERSONAL INFORMATION

- 7.1 Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or trade union membership, require higher levels of protection.
- 7.2 We have to process that special category data to perform our obligations under employment law and the law relating to social protection. Therefore, we do not expect that we will need your specific consent to process that information (because another legal ground will cover our use of that data for these purposes). However, it might be that we ask you for your specific consent from time to time to process such data. Where we or third parties are processing your personal data on the basis that you have consented to that processing then you are entitled to withdraw your consent. If you do withdraw your consent, we may be unable to administer your pension which may result in you and/or your spouse and dependants not receiving the pension and death benefits provided by the Plan.

8 AUTOMATED DECISION-MAKING

- 8.1 Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:
- (a) where we have notified you of the decision and given you 21 days to request a reconsideration.
 - (b) where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
 - (c) in limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.
- 8.2 If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

- 8.3 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

9 DATA SHARING

- 9.1 To the extent that it is necessary or desirable for the management and administration of the benefits provided by the Plan, we will transfer your data to AT&T ITSEL (the “**Company**”), other employers in its group and their advisers, the Plan’s advisers, service providers and/or partner organisations. We may also disclose your information to third parties in order to operate, administer and audit the Plan responsibly, in the event that the Company undergoes any corporate project in the future which may have an impact on the Plan, in the event that we decide to de-risk or insure any of the benefits provided by the Plan (in which case we may disclose your personal data to the prospective insurer(s) and reinsurer(s)) or where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustee, the members of the Plan, or others. We will disclose or provide your information to the extent required pursuant to the Pensions Schemes Act 2021 and Pensions Dashboards Regulations 2022. This may involve the provision of information to qualifying pensions dashboards services. We do not use your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.
- 9.2 Where third parties (such as the Plan’s advisers) are required to process your personal data in order to assist the Trustee or Company in administering the Plan, those third parties may themselves act as data controllers in respect of the way in which they process your personal data and produce their own fair processing notices (also referred to as ‘privacy notices’). Various third parties may from time to time ask the Trustee to provide you with access to their fair processing notices which explain how they process personal data and meet their compliance obligations under privacy laws.
- 9.3 Your personal data may be processed outside of the United Kingdom where required in order for us (or a third party supplier acting on our behalf) or the Company to provide benefits to or in respect of you. In each instance, we would ensure that the processing of your personal data outside the United Kingdom is governed by the standard contractual clauses approved by the Information Commissioner’s Office (or other appropriate safeguarding mechanism under data protection legislation) or is conducted (under the protection of an appropriate contract between us and the recipient) in circumstances where it is necessary in order to administer an overseas pensions arrangement which you have requested. If any such transfers affect you, you can contact us for more information.
- 9.4 Where third parties (such as the Plan’s advisers) are required to process your personal data in order to assist the Trustee in administering the Plan, those third parties may themselves act as data controllers in respect of the way in which they process your personal data and therefore produce their own fair processing notices (also referred to as ‘privacy notices’). Aon Solutions UK Limited and the Plan Actuary, currently John Sydenham of Aon Solutions UK Limited (together “**Aon**”), are data controllers in respect of personal data that they process in order to advise on the administration of the Plan. They have asked the Trustee to provide you with access to their fair processing notice which explains how they process personal data and meet their compliance obligations under privacy laws. This can be accessed at <https://www.aon.com/unitedkingdom/privacy.jsp>.

10 DATA SECURITY

11 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Additionally, we limit access to your personal information to those parties who have a need to know and who will only process your personal information on our instructions and they are subject to a duty of confidentiality.

11.1 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

12 DATA RETENTION

12.1 We will keep your personal data stored on our systems for as long as it takes us to provide the pension and other benefits provided under the rules of the Plan. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data.

13 YOUR RIGHTS UNDER DATA PROTECTION LAW

13.1 It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

13.2 Under certain circumstances, by law you have the right to:

- (a) **Request access** to your personal information (commonly known as a data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- (b) **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- (c) **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- (d) **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- (e) **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- (f) **Request the transfer** of your personal information to another party.

- 13.3 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Trustee in writing.
- 13.4 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in these circumstances.
- 13.5 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
- 13.6 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Trustee. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

14 WHO TO CONTACT

- 14.1 The Trustee is responsible for overseeing compliance with this fair processing notice. If you have any questions about this fair processing notice or how we handle your personal information, please contact the Trustee:
- (a) Through the Hartlink Online Portal: <https://portal.hartlinkonline.co.uk/atandtistel>;
 - (b) By phone: 01227 774621;
 - (c) By post: Capita Pension Solutions Limited, PO 555, Stead House, Darlington, DL1 9YT.
- 14.2 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) with respect to data protection issues. You can report your concerns by telephoning their helpline on 0303 123 1113 or through their website at <https://ico.org.uk/concerns>.

15 CHANGES TO THIS PRIVACY NOTICE

- 15.1 We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

16 EFFECTIVE DATE

- 16.1 This Fair Processing Notice is effective as of 18 September 2025.