

SEDGEMOOR GROUP PENSION FUND ("the Scheme")

Privacy Notice

What is this? This is a notice concerning information that we hold about you and what we do with it.

Why are you sending it to me? There is a law that came into force on 25 May 2018 that requires us to take certain steps, including providing this notice to you.

What's your role? We are the trustee of the Scheme. Details about who we are and how we may be contacted are in schedule 1 to this notice. Part of our role is to look after information about you that is relevant to the Scheme and ensure that it is used properly.

Does anybody else do that? As we explain below, we share information about you with certain people, to enable the Scheme to be run effectively and to enable others to carry out their functions in relation to the Scheme. Certain of our advisers have particular functions that they are obliged to carry out in relation to the Scheme. Where we share information about you with those advisers, for the purposes of enabling them to carry out their functions, they are obliged to look after information about you and use it properly. This applies to:

- the scheme actuary. The scheme actuary is one of our advisers and they assist us with understanding how much money the Scheme needs to be able to provide the promised benefits and the amount of contributions that should be paid to that end. Sometimes the employer of the scheme actuary will carry out similar work for us and be subject to the same obligations; and
- the scheme auditor. The auditor carries out certain checks in relation to financial matters affecting the Scheme.

Current details of the scheme actuary, the employer of the scheme actuary and the scheme auditor are set out in schedule 2. Those details may change from time-to-time. Please refer to our annual report and accounts for up-to-date details.

Where we share information with the Scheme employers and with regulatory, law enforcement and judicial bodies for the purposes of carrying out their functions in relation to the Scheme, then they are subject to their own obligations to look after information about you and use it properly.

What information do you have about me? A description of the types of information that we hold about you is set out in schedule 3 to this notice.

Where did you get it from? We received information about you from various sources, including your application form to join the Scheme, your Scheme employer and any correspondence with you from time-to-time.

What do you use it for? We use information about you for three purposes:

- enabling us to administer the Scheme, including by making arrangements for the transfer of the value of your benefits out of the Scheme (if ever relevant) or for your Scheme benefits to be secured in an appropriate way outside of the Scheme (if ever relevant) and for dealing with any subsequent enquiries;
- liaising with the Scheme employers and their advisers in respect of matters relating to the Scheme, including working with the employers on decisions that they may be required to take, or may wish to take, in relation to the Scheme; and

- liaising with regulatory, law enforcement and judicial bodies in carrying out their functions, insofar as they relate to the Scheme.

Why can you use my information? We are subject to many legal obligations in relation to the Scheme and the provision of benefits for you under it, including those under pensions, trusts and tax law. A number of these obligations are reflected in the governing documents of the Scheme. There are many others of over-riding effect, which may be found in legislation and court cases, some of which are referred to in guidance from, or on the websites of, the Pensions Regulator, HMRC and the Government. We use information about you where necessary for us to comply with those obligations.

Also, we have a legitimate interest in using your information in connection with the purposes stated above, even where doing so is not necessary for compliance with a legal obligation. That legitimate interest is ensuring the effective administration of the Scheme and is consistent with your interests – to help us provide the right benefits to you at the right time.

Are there any exceptions to that? There are certain special categories of information about you where additional requirements apply. A key example of special categories of data relevant to the Scheme is information about your health. If, for example, you ever wish to retire early on grounds of ill-health, we would need information about your health to be able to decide whether we can pay you a benefit and if so, to make sure we get the details about that benefit right. We may also collect information about your spouse or partner which could infer certain special category information, such as sex life or sexual orientation. In those circumstances, we may approach you for your consent to our use of that information for that purpose. This is so unless, at the time, there is anything under UK law that would enable us to use your information to consider and (if relevant) provide that benefit to you without us having to seek your consent.

How long do you keep information about me? The Scheme is a long-term arrangement and you and other members may have rights under it for many years. We need to make sure that we can continue to pay you and others the right benefits at the right time and otherwise administer the Scheme properly. Information about you will be relevant even after:

- your death, as it will be relevant to benefits payable to others as a result; or
- payment of any transfer value in respect of you out of the Scheme, or your Scheme benefits being otherwise secured outside of the Scheme, as you or your receiving scheme or arrangement may later have questions in relation to the benefits you built up under the Scheme.

Accordingly, our policy is to retain information about you for an unlimited period. In the circumstances stated in the two bullet points above, we only retain such information as is necessary for us to achieve the purposes concerned. If it were to become clear, at any time, that the information retained about you is no longer necessary to either purpose, it would then be destroyed securely.

Do you share information about me with anyone? To be able to run the Scheme effectively, we need help from a number of advisers; these include people who carry out day-to-day administration tasks in relation to benefits and help us with matters like how much money the Scheme needs to have to be able to provide the promised benefits, where the money is invested, accounts for the Scheme and legal issues arising. We need to share information about you with these advisers, so that they can give us the help we need to be able to administer the Scheme effectively. We also share information about you with insurers, in order to insure Scheme benefits with them. The information is shared on the basis that the recipients will look after it and use it properly.

As explained above, we may also share it with the Scheme employers and their advisers and with regulatory, law enforcement and judicial bodies.

The government has created a framework for pensions dashboards, designed to help people access information about their pensions online in a single, secure place. As part of this, we were required by law to connect to the pensions dashboard architecture which involved preparing our member data so that our systems would connect to the ecosystem. As part of the dashboards, we are receiving information about individuals and matching it against the data we hold about members on our systems (to verify if a person has a pension with us). Once a match has been achieved, we will be making certain pensions data available to the specific individual.

In light of a 'possible match' we may carry out further data processing to verify whether you have a pension with us.

If you use the pensions dashboards to access information about you, you will be providing certain information (including your name, date of birth and address) to the dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service).

These activities may involve sharing member data with entities within the dashboards ecosystem, non-commercial dashboards and commercial dashboards and with the integrated service provider(s) that our administrator has in place to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboards duties.

As part of these dashboards duties, we may also need to report information (which could potentially include personal information) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.

A list of the types of people with whom we may share information about you, including details of our current advisers, are contained in schedule 2 to this notice. The details may change from time-to-time. Please refer to our latest annual report and accounts for up-to-date details of our advisers.

How is information about me protected? We have taken legal advice about our data protection obligations and put in place arrangements to keep information about you safe; we require our advisers to have appropriate arrangements in place, too.

The professional trustee on our board of directors, Vidett Trust Corporation Limited, has put in place a security control framework that is aligned to the ISO27001:2013 standard and produced a data security statement recording the steps it takes to keep information safe. Where our directors work for a Scheme employer or other company, they benefit from the data security arrangements that it has put in place.

We and our advisers have policies on the retention and destruction of information and on what should happen in the event that there is any breach of the data security arrangements.

Retiring directors are asked to return or destroy all Scheme information that they hold.

When we transfer data to another party, measures are in place to ensure that the transfer is made in a manner that keeps the data secure.

What rights do I have? You have a number of rights in relation to information that we hold about you, namely:

- to ask us to provide access to (including copies of) the information that we hold;
- to have any inaccurate information corrected;
- to restrict what we do with your information, if there is any dispute over the accuracy of your information or whether we are using it lawfully, but unless you then let us use that

information, it may mean that we would not be able to provide the benefits promised to you under the Scheme;

- to withdraw your consent (where we are relying on your consent to use your information);
- to object to how we use your information; and
- to make a complaint to us about how your personal data has been handled

You have certain other rights, including rights, in certain circumstances, to have all information about you erased, to have information provided in a portable format and to object to automated individual decision-making. These rights are unlikely to apply in relation to the information we hold about you and how we use it in connection with the Scheme.

If you wish to exercise any of these rights, please contact the scheme secretary using the contact details below. We will acknowledge receipt of any data protection complaint within 30 days, and we also aim to acknowledge all other requests within this timeframe. Access to your data will usually be provided free of charge.

What happens if something goes wrong? If you have any issues or concerns in relation to the information we hold about you and what we do with it that we do not answer to your satisfaction, you may raise the matter with the relevant regulator, which is the Information Commissioner's Office (www.ico.org.uk). Their helpline currently is 0303 123 1113 and their address currently is Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

Is there anything else that I should know? We and others are not allowed to use or transfer information about you outside of UK or the EEA (the European Union plus Norway, Iceland and Liechtenstein) unless certain conditions apply. These conditions are that either the UK has taken a decision that the relevant country has adequate data protection laws of its own or that appropriate safeguards are in place, such as suitable contractual arrangements.

Where information is transferred to and used outside the UK and the EEA, this will usually be done pursuant to model contractual clauses.

Where can I get further information? We have a data protection policy and a data record, showing the information we share about beneficiaries of the Scheme, which are available on request to the secretary to the trustee. Please contact the scheme secretary by email at Team-Sedgemoor@lcp.uk.com or by post at Scheme Secretary, Sedgemoor Group Pension Fund, Lane Clark & Peacock LLP, St Paul's House, St Paul's Hill, Winchester, SO22 5AB.

Trustee of the Sedgemoor Group Pension Fund
June 2026

SCHEDULE 1

Details of current data controllers

The Trustee

Sedgemoor Group Pension Trustees Limited
(company registration number: 02204182)
2 Chancellor Court
Occam Road Surrey Research Park
Guildford, Surrey
GU2 7AH

Details of (i) the scheme actuary, (ii) the employer of the scheme actuary, (iii) the scheme auditor, (iv) Scheme employers (v) the buy-in insurer and (vi) relevant regulatory, law enforcement and judicial bodies are in the next schedule.

SCHEDULE 2

People we share information with

Adviser/entity	Address	Company registration number	Role
Lane Clark & Peacock LLP	95 Wigmore Street, London, W1U 1DQ	OC301436	Scheme Administrator
Helen Howell FIA	c/o Lane Clark & Peacock LLP, 95 Wigmore Street, London, W1U 1DQ	n/a	Scheme actuary
Lane Clark & Peacock LLP	95 Wigmore Street, London, W1U 1DQ	OC301436	Other Actuarial Services
Hillier Hopkins LLP	Radius House, 51 Clarendon Rd, Watford WD17 1HP	OC303707	Auditor
Winston Taylor International LLP	5 New Street Square, London, EC4A 3TW	FC043202	Legal Adviser
Lane Clark & Peacock LLP	95 Wigmore Street, London, W1U 1DQ	OC301436	Scheme Secretary
Just Retirement Limited	Enterprise House, Bancroft Road, Reigate, Surrey, England, RH2 7RP	05017193	Buy-in insurer and prospective buy-out provider
Lane Clark & Peacock LLP	95 Wigmore Street, London, W1U 1DQ	OC301436	Buy-in and buy-out broker / adviser
The Prudential Assurance Company Limited	Laurence Pountney Hill, London, EC4R 0HH	00015454	AVC provider
HSBC UK Bank plc	1 Centenary Square, Birmingham, B1 1HQ	9928412	Trustee Bank Account Provider
discoverIE Group plc	2 Chancellor Court, Occam Road Surrey Research Park, Guildford, Surrey, GU2 7AH	02008246	Limited Funding Guarantor
Sedgemoor Limited (and advisers to it)	2 Chancellor Court, Occam Road Surrey Research Park, Guildford, Surrey, GU2 7AH	00288011	Scheme Employer
Gothic Crellon Limited (and advisers to it)	2 Chancellor Court, Occam Road Surrey Research Park, Guildford, Surrey, GU2 7AH	00844481	Scheme Employer

Adviser/entity	Address	Company registration number	Role
Townsend-Coates Limited (and advisers to it)	2 Chancellor Court, Occam Road Surrey Research Park, Guildford, Surrey, GU2 7AH	00690635	Scheme Employer
Radiatron Components Limited (and advisers to it)	2 Chancellor Court, Occam Road Surrey Research Park, Guildford, Surrey, GU2 7AH	00964836	Scheme Employer
Stortech Electronics Limited (and advisers to it)	2 Chancellor Court, Occam Road Surrey Research Park, Guildford, Surrey, GU2 7AH	02217300	Scheme Employer
Amega Group Limited (and advisers to it)	2 Chancellor Court, Occam Road Surrey Research Park, Guildford, Surrey, GU2 7AH	02158386	Scheme Employer
Vertec Scientific Limited (and advisers to it)	2 Chancellor Court, Occam Road Surrey Research Park, Guildford, Surrey, GU2 7AH	01677833	Scheme Employer
Acal Electronics Limited (and advisers to it)	2 Chancellor Court, Occam Road Surrey Research Park, Guildford, Surrey, GU2 7AH	01882927	Scheme Employer
The Pensions Regulator	Napier House, Trafalgar Terrace, Brighton BN1 4DW	n/a	Regulatory Body
HM Revenue & Customs	100 Parliament St, Westminster, London SW1A 2BQ	n/a	Regulatory Body
The Pensions Ombudsman	10 South Colonnade, Canary Wharf, London E14 4PU	n/a	Regulatory Body
Pension Protection Fund	12 Dingwall Rd, Croydon CR0 2NA	n/a	Regulatory Body
The Police	Various	n/a	Law Enforcement Body
HM Courts & Tribunals Service	Various	n/a	Judicial Body

SCHEDULE 3

Types of information we hold, use and share

- name
- sex
- date of birth
- address (including email address)
- national insurance number, passport details and / or utility bill details
- driving licence identification number (UK or overseas);
- marital status and the date of birth of any spouse, civil partner or co-habitee
- Scheme employer
- employment status and history in relation to transfers out;
- periods of pensionable service
- pensionable salary and final pensionable salary details
- normal retirement date
- membership status
- date of actual retirement or commencement of pension, transfer out of the Scheme or death (as applicable)
- the benefits and amount of benefits payable or in payment, or the amount of transfer value payable or paid
- details of any transfer payment received by the Scheme
- details of any contributions paid
- bank account details (shared only with people who need to make payments to you)
- details of any arrangements affecting Scheme benefits as a result of divorce
- details relevant to any HMRC limits or allowances or other tax matters
- overseas residency and history.