

REEBOK UK RETIREMENT BENEFITS SCHEME

Privacy Notice

Introduction

We, the Trustees of the Reebok UK Retirement Benefits Scheme (the "Scheme") need to hold personal information relating to you, a member or beneficiary in receipt of benefits, in order to administer your pension and/or death benefits payable from the Scheme. This Notice sets out details of the personal information we hold, why we hold it and what we do with it.

This Notice is being sent to the members of the Scheme and those beneficiaries who are in receipt of a benefit from the Scheme.

Personal information and what we do with it

As noted above, as Trustees of the Scheme, we need personal information about you to run the Scheme. Similarly, other parties involved in running the Scheme will sometimes need to make decisions independently from the Trustees about how your personal information will be used. In particular this will include the Scheme Actuary who is currently Matt Farraker of Mercer Limited ("Mercer").

In legal terms, the Trustees and the Scheme Actuary are both 'data controllers' and are separate and distinct from each other.

In this Notice, you will see information about what the Trustees do with your personal information.

What personal information we have

The Trustees normally hold some or all of the following types of personal information:

- Your name and previous or alternate names, sex, date of birth, national insurance number ("**NINO**") and/or partial or "dummy" NINO and bank account information.
- Contact details (including your address, former address, phone number and email address).
- Details of benefits under the Scheme, including contributions paid, service dates and projected benefits.
- Your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information we might need to pay any benefits due in relation to you.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.
- Electronic "pension identifiers" for pensions dashboards (explained below).

The Trustees may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme, or details about personal relationships to determine who should receive benefits on your death. The Trustees might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

Pensions Dashboards

The government has created a framework for pensions dashboards, designed to help people access information about their pensions online in one place. As part of this, we are required by law to match certain members (who search on dashboards) with their pensions under the Scheme. We must also provide certain pensions information to the dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service) so that it can be displayed when certain members ask to see it on a dashboard.

These activities may involve sharing member data with entities within the dashboards ecosystem, non-commercial dashboards and commercial dashboards and with the provider(s)/the integrated service provider(s)/administrator we appoint 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.

Where we get personal information from

Some of the information the Trustees have comes directly from you. In addition the Scheme administrators may have obtained information from you and passed it to the Trustees. The Trustees may then in turn pass information about you to the Scheme Actuary or may instruct the administrator to do so. The Trustees are the source of the personal information which the Scheme Actuary has about you.

Sometimes the Trustees get information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another scheme if you have transferred benefits from that scheme; from government departments such as HMRC and DWP; and from publicly accessible sources (e.g. the electoral roll) if the Trustees have lost touch with you and are trying to find you. Again, the Trustees may in turn pass this to the Scheme Actuary.

If the Trustees ask you for other information in the future (for example, about your health), they will explain whether you have a choice about providing it and the consequences for you if you do not do so. Some of your personal information may be collected indirectly through the pensions dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service). Where we obtain personal information from the dashboards ecosystem, or during the process of matching members with their Scheme benefits for dashboards purposes, we may retain that data to help demonstrate how and why we concluded that the person is a member entitled to receive information about their benefits on dashboards and to help us administer the Scheme.

Why we hold personal information and how we share it

The Trustees must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to the running of the Scheme.

The Trustees will use your personal information to comply with these legal obligations, to establish and defend their legal rights, and to prevent and detect crimes such as fraud. The Trustees may need to share your personal information with other organisations for this reason, such as courts and law enforcement agencies.

Pensions dashboards regulations impose a legal obligation on us to match certain members with their pensions and provide information on their pension benefits. Testing data and getting ready for pensions dashboards compliance can also be part of our legal obligations.

The Trustees have a legal responsibility to administer the Scheme properly. This includes paying benefits as they fall due, purchasing insurance contracts; communicating with you, testing data and getting ready for pensions dashboards compliance can also be part of our legitimate interests; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance). We can only do this by using your personal information which is part of the Trustees' legitimate interests. In order to achieve this, the Trustees may share your personal information with:

- the Scheme's administrator. The administrator uses the information to administer the Scheme, including to calculate and pay benefits;
- the Scheme's professional advisers (including but not limited to the Scheme Actuary and the Scheme's legal advisers) and auditors. These organisations use the information when advising the Trustees and carrying out their respective professional obligations;
- the Scheme's insurers and annuity providers (and other insurers or brokers for the purpose of obtaining quotations relating to the Scheme or its benefits), investment managers, banks and other service providers;
- any financial adviser or other organisation appointed by the Trustees or the employer 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;
- any other person who is authorised to act on your behalf;
- companies within the employer's group and their professional advisers;
- regulators, government departments, law enforcement authorities, tax authorities and insurance companies;
- any new trustees;
- any relevant ombudsman, dispute resolution body or the courts;
- IT, data storage and any other service providers;
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in the employer's business; and
- internet service providers (relevant to pensions dashboards compliance, as described above), pensions dashboards ecosystem (as described above), non-commercial dashboards and commercial dashboards.

If your benefits are transferred to another scheme, the Trustees will also need to provide the administrators of that scheme with information about you.

The entities listed above may also share personal data with their own business suppliers, for example in relation to the operation of IT systems or where they outsource part of their services.

Some of these entities may also be controllers under the relevant data protection laws. However, in the first instance, you should contact the Trustees using the contact details below if you have any queries about how they use your personal information.

Please note that some of the Scheme's former service providers may continue to hold information about you for their own record keeping purposes once they have ceased to be involved with the Scheme.

If the Trustees need to use information about your health (or other very personal information), we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable the Trustees to use this information without consent, and we will do so where that is necessary to run the Scheme in a sensible way. You can withdraw your consent at any time by contacting the Trustees using the contact details given below. This may affect what the Trustees can do for you, unless they have another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to us processing your health data for that, but then you withdraw that consent, we will usually be unable to consider your application. If you withdraw consent after

our processing, this will not retrospectively affect the processing that has already happened.

Sometimes we need to use your special categories of personal data (examples as above) in order to establish, exercise or defend legal claims.

The Trustees may also share your personal information with another party where you have given your consent. For example, where you transfer your benefits out of the Scheme.

The Scheme's employers may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustees may share your personal information with the employers and their advisers so that they can contact you for that purpose. If you would like advice from an independent financial adviser (IFA) about your entitlements under the Scheme, we'd need to share some of your personal information with them and we'd do that based on your consent (this means we'd ask you to opt-in to allow the sharing) or for our legitimate interests in running the Scheme (this means we'd give you an opportunity to opt-out from the sharing). You'd know which lawful basis applies because we'd explain that in our correspondence with you, whether that's when you're nearing your planned retirement age or when the employer is offering to pay for impartial advice for members at other times (such as when there are additional options available, as mentioned above).

The Trustees may need to share personal data with insurers in relation to the purchase and pricing of insurance contracts called 'annuities' (unless that can happen based on anonymized data). Insurers will use that data to verify the assets and liabilities of the Scheme. The Trustees may write to you before purchasing an annuity to ask for up-to-date information about your spouse/partner/children/other dependants, for this purpose.

The Trustees will share your personal data when we purchase the annuity, and at that stage the insurer will typically share information with its chosen re-insurer. Sometimes the insurer's privacy notice will mention who its re-insurer is and how to see its privacy notice (either giving you a link to it online or explaining where it can be seen or by providing a copy of it). The Trustees will usually need to write to members to explain about the particular annuity and who the insurer is. In this way you can know who holds your personal data and how to exercise your rights against them. The following categories of personal data would typically be shared with insurers: Scheme membership ID number; marital status and details about spouse/partner; date of birth; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement date.

The Trustees may also share your personal data with the sponsoring employer of the Scheme for record keeping purposes if in future the Scheme is wound up. The employer would retain all the personal data for as long as that is necessary to make sure it is able to answer questions about the benefits you've built up in the Scheme before you move over to e.g. an insurer as provider of your pension benefits if that happens in the future (you can find out from the section below how long that is and it's a lengthy retention period because that's needed even when the employer has all the records).

Scheme Actuary

The Scheme Actuary is appointed by the Trustees to value the Scheme benefits and, together with Mercer, carry out other calculations in relation to your Scheme benefits. They will use your personal information for this purpose and have a legitimate interest in doing so. They will also use your personal information to comply with their own legal obligations, and may need to share your details with other organisations for legal reasons, such as courts and law enforcement agencies. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

The Scheme Actuary processes your personal information, separately from the Trustees, for the legitimate reasons above and, for compliance with their own legal obligations as an advisor to the Trustees of the Scheme.

You can find more information about what the Scheme Actuary and Mercer do with your personal information at <https://www.mercer.com/en-gb/footer/data-protection/>.

Sometimes, your information may be used by the Trustees and the Scheme Actuary for statistical research, but only in a form that no longer identifies you personally. In some circumstances the Scheme Actuary may also be able to fulfil the purpose mentioned above using information which the Trustees have anonymised before sharing with them.

How to contact the other people we give your personal information to

Some of the people mentioned above just use your personal information in the way the Trustees tell them. However, others (including the Scheme Actuary) may make their own decisions about the way they use this information to provide their services, perform their functions, or comply with their regulatory requirements. In such a case, they have responsibilities as data controllers in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them, too.

You should contact the Trustees if you wish to exercise rights against the Scheme Actuary. The Scheme Actuary and the Trustees have agreed how to deal with such requests in their contractual arrangements. If you want any more information from the Scheme Actuary or from any other third party who receives your personal information from us, or to exercise any rights in relation to the information they hold, please contact the Trustees (details below) and they will put you in touch with them as appropriate.

How long we keep your personal information for

We need to keep your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Scheme (including if your data originated from the pensions dashboards ecosystem and if you were matched up with the Scheme through that) and pay any benefits due to or in respect of you.

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the majority of the personal information that we hold will be kept for a period of up to 75 years from the end of the Scheme year in which the last payment from the Scheme is made to or in respect of you.

We may need to keep this information for this long so that we can deal with any future queries or complaints. These may arise from you or your beneficiaries, or any other persons.

Data from the pensions dashboards ecosystem is generally kept for a minimum of 6 years after we receive a find request, if there isn't any match resulting from that find request, because we may need this data to meet our reporting requirements.

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant.

To exercise these rights, please use the Trustees' contact details, which are set out below. The Trustees can also supply more information about these rights to you, on request.

If you would like more information from the Scheme Actuary, or to exercise your rights against the Scheme Actuary, please contact the Trustees via the Scheme secretary (details below) in the first instance.

Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Queries and further information

If you want more information about what we do with your information and what your rights are, please contact the Trustees via the Scheme secretary using the following contact details:

Sanderson Law Pensions Management
Lodge Park
Lodge Lane
Langham
Colchester
Essex
CO4 5NE

If you have concerns about the way we handle your personal information, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.

The Trustees of the Reebok UK Retirement Benefits Scheme

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