

2Care Pension Scheme

Privacy Notice for the 2Care Pension Scheme (the “Scheme”)

March 2026

At the date of this notice, the Trustees of the Scheme (“**Trustees**”) act as the data controller for the personal data processed in connection with the Scheme. In doing so, the Trustees must comply with data protection legislation. This notice explains how your data in relation to the Scheme is used.

Trustee address:

Zedra Governance, Park House, Park Square West, Leeds, LS1 2PW.

For enquiries relating to the Scheme’s administration please contact the Scheme administrator:

Broadstone Corporate Benefits Limited, 221 West George St, Glasgow, G2 2ND.
(adminglasgow@broadstone.co.uk)

What we do with your data

As data controller, the Trustees collect and process your personal data for the purpose of administering the Scheme and complying with their legal duties. This includes:

- Calculating, administering and paying benefits under the Scheme before or after a member’s death
- Processing ill-health retirement applications
- Dealing with queries or complaints regarding benefits or membership
- Carrying out actuarial valuations and managing the Scheme’s funding
- Managing investment of Scheme assets
- Complying with legal, regulatory and governance obligations
- Risk management activities and insurance of Scheme liabilities
- Communicating with members about Scheme benefits and options

The Trustees must have a legal reason (often called the legal basis) to hold and use your personal information. The legal basis for processing personal data is primarily to comply with the Trustees’ legal obligations in administering the Scheme and to pursue the legitimate interests of the Trustees in ensuring that the Scheme is properly administered.

Beneficiaries

The Trustees may also receive information from members about their family or personal circumstances, such as marital status, details of spouse/civil partner, dependants, other family members and death benefit nominated beneficiaries. Where such information is provided, we assume that you have the consent of the relevant individual to provide this information for the Trustees and that you will share a copy of this notice with them.

What data is processed?

The personal data we hold about you (and your beneficiaries) may include:

Personal information, such as:

- Name, gender, age and date of birth
- National insurance number or other identification numbers
- Contact details such as postal address, telephone numbers and email address

Financial information

- Salary and pensionable pay
- Tax information
- Pension entitlements and benefits
- Bank account details for payment of benefits

Employment information

- Employment history
- Dates of employment and pension scheme membership
- Job title and employment status
- Length of service

Family and beneficiary information

- Marital status
- Information about spouses, partners, dependants or beneficiaries

Other supporting documentation

- Information contained in documents such as birth certificates, death certificates or other identification documents.

Sensitive personal data

The Trustees may also process special category data or “sensitive” personal data about some members for limited and specific purposes (such as in relation to determining ill-health early retirement applications or for the payment of discretionary death benefits). The Trustees will usually only process such data with your explicit consent. Where the Trustees are relying on your consent to process sensitive data you may withdraw this at any time. Where it is not possible or practical to obtain consent, the Trustees will only hold such data where it is necessary in order to determine the benefits payable. . This data will be processed where permitted by law, including where necessary for legal claims or to comply with obligations relating to social security and employment law.

How we collect personal data

We collect personal data from a number of sources including:

- Members themselves
- Employers participating in the Scheme
- The Scheme administrator
- Payroll providers and other service providers
- HM Revenue & Customs (HMRC), the Department for Work and Pensions (DWP) and regulatory bodies
- Tracing agencies
- Members' beneficiaries or dependants
- Medical practitioners (with consent where required)

This information is provided to us by telephone, email, post, electronic systems or through third-party service providers involved in administering the Scheme.

Who we share your data with

In order to administer the Scheme, personal data may be shared with third parties involved in operating the Scheme. These may include:

- the Scheme administrator (currently Charterhouse Consultancy Limited)
- actuarial consultants and Scheme actuary
- legal advisers
- auditors and professional advisers
- the Scheme sponsoring employers and associated companies
- insurers and annuity providers
- tracing agencies and medical advisers
- printers and communication providers
- regulators including HMRC, the Pensions Regulator and other governmental bodies
- courts, tribunals or law enforcement agencies where required by law

The Trustees may disclose your personal data to these third parties in connection with their services provided to the Trustees. Those third parties may also disclose your personal data to any sub-processors that they engage in respect of these services. The Trustees may also, where appropriate, share your personal data with the employers in relation to the Scheme, and to their advisers, for example to assist the employers with determining the Scheme's benefits and liabilities.

Your personal data may also be shared with other organisations in connection with corporate transactions involving the sponsoring employer or in connection with transfers to other pension schemes.

The Trustees may also disclose your personal information to third parties in the following types of situations:

- In considering entering into a buy-in or buy-out of any of the benefits under the Scheme, in which case the Trustees may disclose your personal data to any prospective counterparty (and any reinsurer) to such a transaction;
- If the Trustees are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirement.

If you required further details about the disclosure of personal data, please contact the Trustees (contact details below).

International transfers

Wherever possible, the Trustees will process your data only within the United Kingdom or European Economic Area (EEA). Certain countries outside of the EEA have been approved as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export personal data to these jurisdictions. The Trustees do not generally, and have no intention to, transfer or process the personal data that is collected about you outside the EEA, but if it is necessary to do this the Trustees will ensure that adequate safeguards in respect of the security of the information are in place.

How long we keep your data

Pension benefits are often payable over many years. The Trustees therefore retain personal data for as long as necessary to administer your benefits and to maintain records of compliance with their obligations under the Scheme. Inevitably, this means that data may be retained by the Trustees for extremely long periods of time, including after you have ceased to be entitled benefits under the Scheme.

Typically:

- Data will be retained for the duration of your membership and payment of benefits, and
- For a reasonable period afterwards to resolve queries or legal matters.

Some data may be retained longer where necessary to ensure benefits are correctly paid or where required by law.

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine trust-related need to know it. Those processing your information will only do so in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Your rights

Under the UK GDPR you have a number of rights regarding your personal data, including the right to:

- Access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- Require us to correct any mistakes in your information we which we hold;
- Request erasure of your personal data in certain circumstances;
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit such data to a third party in certain situations;
- Object at any time to the processing of your personal information concerning you for direct marketing;
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- Object in certain other situations to our continued processing of your personal information;
- Otherwise restrict our processing of your personal information in certain circumstances.

To exercise your rights, please contact the Scheme administrator using the contact details above.

More information regarding your rights can be found at the website of the Information Commissioners Office (www.ico.org.uk).

Keeping your information up to date

Please inform the Scheme administrator as soon as possible if your personal details change (for example a change of address or nominated beneficiary) so that Scheme records can be kept accurate.

Complaints

If you have concerns about how your personal data is being handled, please contact the Trustees or the Scheme administrator first.

If you are not satisfied with the response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

ICO contact details:

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Telephone: 0303 123 1113

Website: www.ico.org.uk

Changes to this notice

The Trustees may update this privacy notice from time to time to reflect changes in legal requirements or Scheme administration.