

PRIVACY NOTICE FOR GRAHAM ASSET MANAGEMENT PENSION AND LIFE ASSURANCE SCHEME

The Trustees of the Graham Asset Management Pension and Life Assurance Scheme ("the Scheme") hold and process personal data about our members and their beneficiaries in order to run the Scheme. In doing so, we comply with the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018 and other relevant UK legislation. The Trustees are a data controller in their own right and, in addition, will be a joint data controller with the Scheme Actuary, Diane Cadden, in respect of certain activities. This privacy notice is issued by the Trustees and covers processing carried out by them when acting as a data controller (in their own right or jointly with the Scheme Actuary. In some circumstances, other professional advisers appointed by the Trustees may be considered data controllers, including the Scheme's auditors or legal advisers; they will have their own privacy notices explaining how they process your personal data.

We describe in this Notice the personal data which we collect about you and other individuals (for example, your spouse or beneficiaries), what your personal data is used for, and what your rights are. Personal data means any information relating to an identified or identifiable individual.

What is your personal data used for?

The Trustees collect and process your personal data for the purposes of complying with their legal duties to administer the Scheme and for other legitimate purposes in relation to the ongoing operation and management of the Scheme. This includes:

- Communicating with members in relation to their benefits, responding to requests and queries;
- General administration of the Scheme, including calculating, recording and paying benefits;
- Meeting the Trustees' ongoing regulatory, legal and compliance obligations;
- Risk management purposes such as longevity modelling, managing Scheme assets, insurance solutions, member option exercises (including pension increase exchange and transfer value exercises);
- Improving our processes and use of technology, including testing and upgrading of systems

The Scheme Actuary, Diane Cadden, processes your personal data to undertake various tasks, primarily around scheme funding.

What personal data do we hold?

We may collect, use or otherwise process the following types of personal data about you and, in some circumstances, your spouse, civil partner, partner or dependants:

- name, gender, address, date of birth, NI number, contact details, employee ID, marital status,

dependant details (if applicable), salary information, contribution history, details of pension sharing orders/earmarking orders;

- bank account details and tax information in relation to your pension benefits;
- information about your membership of the Scheme (for example service dates and benefit amounts);
- information about any other pension arrangements you have.

The Trustees may also hold some special categories of personal data for the purposes of administering the Scheme, for example in relation to ill-health or death benefits.

Where we hold special categories of personal data, we will explain to you at the time why we need it and how the information will be used. We will only process special categories of personal data where we need to do so to establish a right to a benefit.

Should legislation require us to obtain your explicit consent to process special categories of personal data (e.g. health data), we will seek your consent at the appropriate time.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by Graham Asset Management Limited, a family member (if they choose to nominate you for the death benefits that may be due on their death), personal representatives, persons acting on your behalf and other organisations, such as HMRC, DWP, other pension schemes, regulatory bodies, public registers and tracing organisations.

We also receive information from members about their beneficiaries, who may be eligible to receive benefits on the member's death.

Who do we share your personal data with?

To comply with our legal duties and for the purposes of Scheme administration, the Trustees may share your information with:

- the Scheme's administrator who process information to run the Scheme;
- the Scheme's professional advisors, including the Scheme Actuary, auditor, legal advisor, and any other financial advisor or other organisation appointed to advise you in regard to your options under the Scheme;
- the Scheme's insurers and annuity providers, investment managers, banks or other service providers;
- the Company and their professional advisors;
- statutory and regulatory bodies, including but not limited to HMRC, DWP and tracing organisations; and
- service providers who support the operation and security of the Scheme, including communications consultants, payroll agents, data cleansing and tracing providers, IT and data storage providers.
- Any other person who is authorised to act on your behalf.

Certain advisers (including the Scheme Actuary, auditors and lawyers) may act as controllers in their own right and may issue their own privacy notices.

What is our lawful basis for processing your personal data?

Under data protection legislation, we need to have a lawful basis each time we use, share or otherwise process your personal data.

The Trustees have certain duties and powers which are conferred on it by law or by the Scheme's Trust Deed and Rules. In most cases, the processing of your personal data is necessary so that the Trustees can perform those duties and exercise those powers (for example, to pay your benefits).

Certain uses of your personal data, or other processing activities, may not be strictly necessary for the Trustees to perform their legal duties and regulatory responsibilities, or to exercise its powers. However, it may be that certain uses of your personal data are necessary for the purposes of the Trustees' legitimate interests.

When we say "legitimate interests", we mean the Trustees' interests in operating the Scheme as properly, efficiently and securely as possible. For example, to manage matters associated with the provision of your benefits under the Scheme, including offering you choices as to the form or timing of those benefits. Where we rely on legitimate interests, you have the right to object. Where processing involves special category data, we will rely on the appropriate conditions under data protection law, or seek your explicit consent where required.

Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years.

Our policy is therefore to retain personal data about our members and their beneficiaries until after their membership of the Scheme ends, and for such longer period as is necessary to enable us to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

International transfers of your personal data

In certain circumstances your personal data may be processed outside of the UK; for example, by our third party service providers. Where this happens, we will ensure your data is protected in accordance with UK law by using one or more of the following:

- UK adequacy regulations;
- UK-approved standard contractual clauses (including the International Data Transfer Agreement or the UK Addendum to the EU standard contractual clauses) together with transfer impact assessments and any necessary supplementary measures; or
- other appropriate safeguards where applicable.

Further details on the steps we take to protect your personal data in these cases are available from us on request by using the contact details below.

Your rights

You have the following rights in relation to your personal data. You can ask us for more information about any of these rights by contacting us using the details at the end of this notice:

- Right of access. You have a right of access to any personal data we hold about you, including asking us for a copy of your personal data;
- Right to update your information. You have a right to request an update to any of your personal data which is out of date or incorrect;

- Right to delete your information. You have a right to ask us to delete any personal data which we are holding about you in certain specific circumstances;
- Right to restrict use of your information: You have a right to ask us to restrict the way we process your personal data in certain circumstances;
- Right to data portability: You have a right to ask us to provide your personal data to a third party provider of services in certain circumstances;
- Right to object. Where we process your personal data on the basis of our, or another person's, legitimate interest, you have a right to ask us to consider any valid objections which you have to our use of your data.

If you want to exercise these rights, please contact the Scheme administrator using the contact details provided at the end of this notice. When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity.

We will consider all requests from you to exercise your rights (including whether they apply in a particular case) and provide our response within one month of your request, unless we tell you we are entitled to a longer period.

Please note that certain personal data may be exempt from such requests, for example if we need to keep using the information to comply with our own legal obligations. If an exception applies, we will tell you this.

However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

How do we keep your personal data secure?

The main risk of our processing your personal data is if it is lost, stolen or misused. For these reasons, we are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and to take all reasonable precautions to safeguard the confidentiality of personal data.

Although we make every effort to protect the personal data you provide, the transmission of information over the internet is not completely secure. As such, you acknowledge that we cannot guarantee the security of personal data transmitted to us in this way.

Once we have received your personal data, we will use appropriate procedures and security features to prevent

unauthorised access, and take steps to ensure that any third parties with whom we share personal data do the same.

Contact details

If you have any questions about this Notice or would like to exercise your rights in respect of your data, please contact our pension administration team using the following contact details:

Isio Group
PO Box 163
Blyth
NE24 9GS

+44 333 016 5303
GAMPensions@isio.com

What if you have a complaint?

If you would like to make a complaint about how we have handled your information, please contact us using the details provided above.

If you are not satisfied with our response to your complaint or believe our processing of your data does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

The ICO's contact details are:

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

0303 123 1113

Changes to this privacy notice

The Trustees may change this Notice from time to time and we will notify you of any material changes.

This privacy notice was last reviewed and updated in March 2026.