

# GENERAL PRIVACY NOTICE

In order to run the Scheme, the Scheme's Trustee needs some personal data about you (such as your name, address, and date of birth). This privacy notice explains more about the information we hold, how we use it and what your rights are.

## Who we are

TI Pension Trustee Limited ('the Trustee' or 'we') holds certain personal information (known as 'personal data') about Scheme members and their dependants and beneficiaries, where applicable. Personal data is information from which you, as an individual, can be identified.

## What information do we collect about you?

Depending on the circumstances and the stage of your membership, we may hold some or all of the following about you:

- your name and date of birth
- your address
- your gender
- your marital status
- your National Insurance number
- details of your bank account and tax status (to pay benefits)
- details about your dependants and/or beneficiaries so that we can pay benefits following your death
- information from your Smiths Group employer about your salary
- medical and other details about your health that you have given us if you apply to receive benefits on these grounds or if these details are collected for statistical purposes
- any other information you provide directly to us in connection with the Scheme.

## How do we use that information?

The Trustee holds and processes information about you to administer the Scheme and to calculate and pay benefits. In legal terms, this means that we have a legitimate interest in processing the information. For more information on this, please see Appendix 1.

We also keep this information to comply with our obligations towards members under the Scheme's governing documents, as well as under relevant legislation. We will not collect any personal data from you unless it may be needed.

Personal data relating to the Scheme is held on paper and on computer systems. As the 'data controller', the Trustee must process this information fairly and

lawfully. In some contexts, companies in the Smiths Group and the Scheme Actuary may also be a 'data controller' (i.e. where they decide the purposes for and the means by which personal data is processed). They must also process the information fairly and lawfully. Some of these data controllers have provided us with details as to how they will meet these requirements - please see Appendix 2 for links to their own privacy notices.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as 'sensitive personal data'). Under the data protection legislation, sensitive personal data includes details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation, political affiliations and criminal records. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. For example, this could be relevant for Scheme members who apply for ill-health retirement.

## Who do we share your data with?

We are not allowed to disclose personal data about you to other organisations and people, unless the law allows us to or you have given your consent. As we need to share information with others to provide your benefits, there is a legitimate interest in the Trustee sharing this information. We may also need to share it to meet contractual and other legal obligations.

We share personal data with the following people and organisations:

- the Scheme's administrator (currently Aptia)
- the Scheme's consultant for data projects (currently Independent Transition Management Limited)
- the Scheme's consultant for tracing members and verifying member data (currently The Tracing Group)
- other third parties who assist with the day-to-day administration of the Scheme on behalf of the Trustee
- companies in the Smiths Group, where appropriate
- Smiths Pensions Limited in their role of support to the Trustee
- the Scheme Actuary (currently Keith Poulson of Aon)
- the Scheme's actuarial and risk settlement advisers (currently Aon)
- the Scheme's auditor (currently Crowe UK LLP)

- the Scheme's legal advisers (currently Mayer Brown International LLP and Sackers LLP)
- other professional advisers providing services to the Trustee
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- the consultant (currently Wordshop) and printers who help us prepare various communications we send to you, such as the annual newsletter
- our appointed insurance company or companies for the purposes of buy-ins, death benefits and additional voluntary contributions (currently Rothersey Life, Pensions Insurance Corporation, Legal & General and Aviva who are all bulk annuity providers, and Legal & General, Prudential and Phoenix who invest members' additional voluntary contributions)
- financial services providers – depending upon how we pay benefits, we may have to supply personal data to effect a BACS transfer in the UK and/or a payment when benefits are being paid overseas
- our annuity adviser (currently Hargreaves Lansdown)
- our provider for member advice (currently UK Workplace Solutions).

This list of recipients is not exhaustive and from time to time we may need to share personal data with other third parties in order to administer the Scheme and pay benefits, for example, if we engage a different service provider.

### International transfers of personal data

From time to time, the people or organisations with whom we share personal data may request that we transfer personal data to their operations outside the UK. On a case-by-case basis, we may agree to such transfers of personal data to operations in countries which have data protection laws deemed acceptable by the UK. For other countries, we will only agree to such transfers of personal data where we are satisfied that the personal data will be sufficiently protected through measures in place between the data exporter and the data importer. Any standard contractual clauses which we put in place for export of the personal data will be available from the Scheme administrator identified below.

### How long do we keep personal data for?

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of six years. However, given the nature of pension schemes, the Trustee may be required to keep some of your personal

information for the rest of your life so that we have the information we need to pay benefits and to answer queries about your benefits.

We review the personal data held in relation to the Scheme on a regular basis in accordance with our data protection policy (as amended from time to time).

If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

### Your rights

- You have the right to see the personal data that is held about you and have a copy provided to you, or someone else on your behalf, in a machine-readable (digital) format. This right always applies. However, there are some exemptions which mean you may not always receive all of your personal data that we process
- If at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected. This right always applies
- You can request the transfer of your personal data which you have given to us to another party. This right only applies where we rely on your consent to process your personal data
- You can require the Trustee to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- You can object to your personal data being processed where we rely on a legitimate interest as a legal basis for processing your personal data (unless we have compelling legitimate grounds for the processing)
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see 'Who to contact' below)
- In certain circumstances, you can request that your personal data is deleted if there is no legitimate reason for its continued processing.

You should be aware that taking any of the above steps could impact on the payment of your benefits and our ability to answer questions relating to your benefits. Please note that in certain circumstances, the Trustee can override your request to take the above steps to object to processing, withdraw consent and delete personal data.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

### Who to contact about your personal data

If you wish to see your personal data, exercise any of the rights mentioned above or make a complaint about how we have handled your personal data, please contact the Scheme administrator, Aptia at [personuk.aptia-group.com](mailto:personuk.aptia-group.com) or 0121 452 3739.

## Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office on 0303 123 1113.

## Updates to this notice

This notice is the latest version as at September 2024. It will be updated from time to time and you can see the current version at any time on the Scheme's website at <https://pensions.smiths.com/ti-group-pension-scheme/privacy-statement>. Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see 'Who to contact' above).

**The Trustee of the TI Group Pension Scheme  
September 2024**

# Appendix 1

## The purpose and legal basis for processing your information

The purposes for which we may process non-sensitive Personal Data and the legal basis on which we may perform such processing is set out below:

Processing purpose	Types of personal data	Legal basis for processing
Calculating and paying your pension benefits	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in paying the correct benefits on time to the correct recipients in accordance with the Rules of the Scheme
Management of any pension savings (Defined Contribution) benefits you hold	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• length of employment</li> <li>• other relevant information provided to us (such as your investment instructions)</li> </ul> <p>Information provided by employers and third parties:</p> <ul style="list-style-type: none"> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legal obligation to</b> manage any pension savings benefits you hold in accordance with the provider's policy and the Rules of the Scheme
Communicating with you in relation to the Scheme and your benefits	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> </ul>	We have a <b>legitimate interest</b> in communicating with you in relation to the Scheme and your benefits

	<ul style="list-style-type: none"> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	
<p>Administering the Scheme in accordance with its Rules and applicable law</p>	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	<p>We have a <b>legitimate interest</b> in administering the Scheme in accordance with its Rules and applicable law</p>
<p>Complying with applicable Government bodies regulations and guidance</p>	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information</li> </ul>	<p>We have a <b>legitimate interest</b> in administering the scheme in accordance with applicable regulations and guidelines.</p>

	<p>provided to us</p> <p>Information provided by employers and third parties:</p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	
<p>Establishing, exercising and defending our legal rights</p>	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	<p>We have a <b>legitimate interest</b> in establishing, exercising and defending our legal rights</p>
<p>Sharing Personal Data with third parties</p>	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your</li> </ul>	<p>We have a <b>legitimate interest</b> in sharing Personal Data with third parties in order to administer the Scheme</p>

	<p>employment, salary, contributions and benefits</p> <ul style="list-style-type: none"> <li>• other relevant information provided to us</li> </ul>	
Insuring benefits with third parties	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in sharing Personal Data with insurance companies in order to take out appropriate insurance of liabilities.
Maintaining Scheme's records	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in maintaining Scheme records in order to establish entitlement to benefits under the Scheme
Considering any potential beneficiaries of death benefits under the Scheme	<p>Personal data of potential beneficiaries:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> </ul>	We have a <b>legitimate interest</b> in selecting beneficiaries of your death benefits under the Scheme

	<ul style="list-style-type: none"> <li>• marital status</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul>	
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We may also process Sensitive Personal Data for the following purposes and under the following legal bases:

<b>Processing purpose</b>	<b>Types of personal data</b>	<b>Legal basis for processing</b>
Considering your eligibility to receive an incapacity pension under the Scheme and to assess your continued eligibility from time to time	<ul style="list-style-type: none"> <li>• health information</li> </ul>	We have obtained your <b>explicit consent</b> to process your ill-health request
Considering your eligibility to receive a serious ill-health lump sum	<ul style="list-style-type: none"> <li>• health information</li> </ul>	We have obtained your <b>explicit consent</b> to process your ill-health request
Holding an expression of wish form completed by you in respect of any lump sum benefit payable on your death	<ul style="list-style-type: none"> <li>• sexual orientation</li> </ul>	We have obtained your <b>explicit consent</b> to process any information which reveals your sexual orientation

Further information in relation to the processing of data are available on request.



## TI Group Pension Scheme ('the Scheme')

# Appendix 2

Some of the third parties appointed by the Trustee and the organisations that support the Scheme are, for the purposes of the data protection laws, data controllers in their own right (i.e. where they decide the purposes for and the means by which personal data is processed). They must process the information fairly and lawfully.

In order to provide more detail about the information these data controllers hold, how they use it and your rights in respect of it they have produced their own privacy notices.

Please see the respective links below.

### Aon Solutions UK Limited

The Trustee has appointed Aon Solutions UK Limited ("Aon") to provide help and assistance in running the Scheme. Certain personal information about members of the Scheme is shared with Aon from time to time in order for it to carry out this appointment. Aon has advised the Trustee that, under the new regulations, it will be acting as a 'data controller' in relation to this personal information, which means it will decide the purposes for and the means by which this personal information is processed. Aon must process this information fairly and lawfully. It has provided the following summary of its formal privacy notice which sets out more about the information it holds and how it will use it.

### Aon Solutions UK Limited "QUICK READ" PRIVACY NOTICE

Aon Solutions UK Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the TI Group Pension Scheme ("the Scheme"). In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions and your retirement age. In some limited circumstances Aon may be provided with information about your health (to assist in the calculation of a benefit or in assessing its actuarial value) in order to be able to provide these services. The purposes for which Aon uses personal information may include the provision of advice to the Scheme Trustee to assist in the management of the Scheme, Scheme funding (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the benefits for the members who are party to it), providing advice on the different ways benefits could be determined and drawn, Scheme Actuary duties (which include assessing benefits and options for individuals who are members and assessing the amounts and timing of benefit payments to manage the Scheme appropriately),

regulatory compliance, process and service improvement and benchmarking.

Aon may pass your personal information to third parties such as insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at

<https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>, or you can request a copy by contacting Aon, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH

**Aon Solutions UK Limited – March 2024**

### Legal & General

The Trustee has appointed Legal & General Assurance Society (L&G) as a bulk annuity provider. In respect of certain members of the Scheme, some personal information about members of the Scheme is shared with L&G in order for them to carry out this appointment.

<https://www.legalandgeneral.com/privacy-policy/>

### Pension Insurance Corporation

The Trustee has appointed Pension Insurance Corporation ("PIC") as a bulk annuity provider. In respect of certain members of the Scheme, some personal information about members of the Scheme is shared with PIC in order for them to carry out this appointment.

<https://www.pensioncorporation.com/privacy-policy/>

### Rothsay Life

The Trustee has appointed Rothsay Life as a bulk annuity provider. In respect of certain members of the Scheme, some personal information about members of the Scheme is shared with Rothsay Life in order for them to carry out this appointment.

[www.rothesaylife.com/policyholder/data-protection](http://www.rothesaylife.com/policyholder/data-protection)

### Prudential

If you hold Scheme benefits with Prudential, one of the Scheme's providers, they will hold some personal information about you in order to administer these.

<https://www.pru.co.uk/mydata-bapn/>

## Aviva

Some benefits under the Scheme are insured or invested with Aviva who will hold some personal information about members of the Scheme whose benefits are insured or invested with it.

[www.aviva.co.uk/privacypolicy](http://www.aviva.co.uk/privacypolicy)

**The Trustee of the TI Group Pension Scheme  
September 2024**