smiths

Smiths Industries Pension Scheme ('the Scheme')

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

S.I. Pension Trustees 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
- if you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, a "pensions identifier", which is a string of characters used to identify your specific benefits under the Scheme
- any other information you provide directly to us in connection with the Scheme.

How do we gather information about you?

Your personal data will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from the Scheme, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death.

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
- to the extent required to comply with our duties in relation to individuals using pensions dashboards. This includes "matching", where we use personal data that a user has provided to search our Scheme records to check whether that user is a member of the Scheme, and where we collect further personal data from that user in the event of a "possible match".

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, the Scheme Actuary, the Scheme's legal advisers, and insurers 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, biometric data, 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 or wish to verify their identity online.

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 Lumera)
- 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 Roger Moring of Aon)
- the Scheme's actuarial and risk settlement advisers (currently Aon and Hymans)
- 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 Canada Life, Pension Insurance Corporation and Prudential who are all bulk annuity providers and Legal & General, Phoenix and Prudential who invest members' defined contributions and 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)
- third parties who are involved with providing pension dashboards (for further information please refer to the Money and Pension Service website - https://maps.org.uk/en/our-work/pensions#Pensions-Dashboards.

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. Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction.

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. In particular, in the limited circumstances that biometric data is collected, our expectation is that it will be appropriate for it to be destroyed immediately after use.

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, or exercise any of the rights mentioned above
please contact the Scheme administrator, Aptia online at pensionuk.aptia-group.com or 0121 816 1889.

Our data protection complaints process

As the "data controller" in relation to the Scheme, the Trustee is required to have a process in relation to data protection complaints. The ICO expects you to have gone through our internal complaints process before contacting it with a data protection complaint.
This section sets out the Trustee's process in relation solely to **data protection complaints**. If your complaint relates to any issues regarding your pension benefits (e.g. how your benefits have been calculated, communicated or paid) or about the administration of the Scheme more generally, you should use the Scheme's internal dispute resolution procedure (or IDRP), a copy of which is available by contacting Aptia (see 'Who to contact about your personal data' above).

Who can make a complaint?
You can make a complaint if:

- the Trustee or those acting on its behalf control or process personal data relating to you, **and**
- you consider that data protection legislation has been infringed because of the way your personal data has been handled.

If you prefer, you can nominate a representative to make the complaint on your behalf. The representative may be a legal adviser, a financial or other adviser or a family member or friend.

How do I make a complaint?
If you have a data protection complaint, please write to:
The Secretary to S.I. Pension Trustees Limited
c/o Smiths Pensions Limited
Level 10, 255 Blackfriars Road
London
SE1 9AX

Email: trustee@smiths.com
Tel: 07823 327438

Please include your full name and address and date of birth with your complaint. Please provide as much detail as possible about the complaint and any relevant documentation. Please also state what remedy or step you would like to be granted or taken in response to the complaint. If you are nominating a representative to deal with the complaint on your behalf, then you will need to include evidence that your representative has been authorised by you.

The Trustee will acknowledge receipt of your complaint within 30 days of receiving it. If you have not received an acknowledgement by that time, please contact Smiths Pensions Limited to check your complaint has been received.

What happens next?
Following receipt of the complaint, we will make appropriate enquiries. This may include seeking further information from you.
We will inform you of the outcome of our investigation as soon as we are able but we cannot give a specific timeframe, as some complaints may take longer than others to investigate. Where an investigation is taking more time, we will provide you with updates about its progress.

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to your data protection complaint then we are happy to discuss it further with you. You are also able to complain to the Information Commissioner's Office. The ICO's contact details are:

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

Telephone: 0303 123 1113.

Make a complaint | ICO (this is a web based complaints form)

Updates to this notice

This notice is the latest version as at May 2026. 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/smiths-industries-pension-scheme/privacy-statement
Alternatively, if you would prefer to receive a hard copy of the notice, please request this from Aptia (see 'Who to contact about your personal data' above).

The Trustee of the Smiths Industries Pension Scheme
June 2026

Smiths Industries Pension Scheme ('the Scheme')

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	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a **legitimate interest** 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	Information provided by you: • name • date of birth • length of employment • other relevant information provided to us (such as your investment instructions) Information provided by employers and third parties: • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a **legal obligation to** 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	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a **legitimate interest** in communicating with you in relation to the Scheme and your benefits
Administering the Scheme in accordance with its Rules and applicable law	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a **legitimate interest** in administering the Scheme in accordance with its Rules and applicable law
Complying with applicable Government bodies regulations and guidance (including in relation to providing information for pensions dashboards)	Information provided by you: • name • date of birth • gender • marital status	We have a **legitimate interest** in administering the scheme in accordance with applicable regulations and guidelines.

	• bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	
Establishing, exercising and defending our legal rights	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a **legitimate interest** in establishing, exercising and defending our legal rights
Sharing Personal Data with third parties	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information	We have a **legitimate interest** in sharing Personal Data with third parties in order to administer the Scheme

	provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	
Insuring benefits with third parties	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a **legitimate interest** in sharing Personal Data with insurance companies in order to take out appropriate insurance of liabilities.
Maintaining Scheme's records	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status	We have a **legitimate interest** in maintaining Scheme records in order to establish entitlement to benefits under the Scheme

	information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	
Considering any potential beneficiaries of death benefits under the Scheme	Personal data of potential beneficiaries: • name • date of birth • marital status • contact details • other relevant information provided to us	We have a **legitimate interest** in selecting beneficiaries of your death benefits under the Scheme

We may also process Sensitive Personal Data for the following purposes and under the following legal bases:

Processing purpose	Types of personal data	Legal basis for processing
Considering your eligibility to receive an incapacity pension under the Scheme and to assess your continued eligibility from time to time	health information	We have obtained your **explicit consent** to process your ill-health request
Considering your eligibility to receive a serious ill-health lump sum	health information	We have obtained your **explicit consent** 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	sexual orientation	We have obtained your **explicit consent** to process any information which reveals your sexual orientation
Verifying your existence through online verification tools	biometric data	We have obtained your **explicit consent** to process any biometric provided for the purposes of validating your existence

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

Smiths Industries 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 Smiths Industries 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

Canada Life

The Trustee has appointed Canada 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 Canada Life in order for them to carry out this appointment.

https://www.canadalife.co.uk/data-protection-notice

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/

Prudential

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

https://www.mandg.com/assets/shared/documents/en/genm101312608.pdf covers bulk annuity benefits and **https://www.mandg.com/assets/shared/documents/en/genm894002.pdf** covers AVC benefits.

Sacker & Partners LLP

Sacker & Partners LLP are the legal advisers to the Scheme, and in certain circumstances will be data controllers. See their privacy notice for pension scheme members, beneficiaries and client's employees online at **https://www.sackers.com/more/privacy-notice/pension-scheme-members-beneficiaries-and-clients-employees/**

The Trustee of the Smiths Industries Pension Scheme
June 2026