Volvo Construction Equipment Pension & Life Assurance Plan - Privacy Notice

This Privacy Notice has been issued by the Trustee and Scheme Actuary of the Volvo Group UK Pension Scheme (the Scheme) to comply with the United Kingdom General Data Protection Regulation ("UK GDPR"). The UK GDPR replaced its predecessor, the EU GDPR after Brexit. This document replaces any Fair Processing Notice issued under the Data Protection Act 1998.

Data controllers

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustee and Scheme Actuary, Ryan Markham of Hymans Robertson LLP, are considered "Joint Data Controllers" (the holders, users and processors of personal data) for the purposes of the UK GDPR. It is possible that in some circumstances other professional advisers appointed by the Trustee may be considered to be Data Controllers. This might include the Scheme's auditor or legal advisers.

The Scheme's administrator is Aptia. As Aptia processes the personal data on behalf of the Data Controllers, they are the "Data Processors".

The Joint Data Controllers can be contacted as follows:

The Trustee of the Volvo Construction Equipment Pension & Life Assurance Plan
c/o Vidett Trust Corporation Limited
Forbury Works
37-43 Blagrave Street
Reading
RG1 1PZ

Email: vct@vidett.com

Telephone: 0118 207 2905

Use, transfer and storage of personal data

In the course of running the Scheme, we may require information from you in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner's) health. Such information will be used by the Scheme's administrators to determine the benefits payable to you and your beneficiaries.

In addition, we may hold any or all of the following items of personal information about you to the extent they may be relevant to the calculation and payment of benefits from the Scheme to you or to your dependants / beneficiaries:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Copies of identification documents such as passport and drivers licence.
- Descriptions relating to your physical and mental health.
- Salary and data relating to investments and pension assets held outside of the Scheme.
- Employment history, including employment dates and historic pay and salary records.
- Bank account details for payment of benefit instalments, and HMRC tax code.

- Any information you have provided about who you would like to receive benefits due on your death. This could be your spouse or civil partner, your child or other dependent, and it could include birth, adoption details of children, marriage certificate details, and change of name details.

Your personal data is provided to the data controllers by the principal and/or participating employer of the Scheme or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Scheme. We will keep your personal information for as long as we have a relationship with you or your dependents. When deciding how long to keep your personal information after that relationship ends, we take into account our legal obligations and regulators' expectations.

The Trustee shares your data with the Scheme's administrator, Aptia, Scheme Actuary, the sponsoring employer and AVC providers. They may also share data with the Trustee's other professional advisers (including the legal adviser, Scheme Auditor, insurers and pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator), IT and data storage providers, and other service providers such as tracing agencies we use if you are not at the address we have on record, and also mailing companies who print and post letters and documents to you on our behalf. Under the UK GDPR, we are required to process personal data securely by means of appropriate organisational and technical measures. As Data Controller, we have put measures in place to protect your personal data including if we need to share your personal data with the Scheme administrator or other data processors; if this is required, we will make sure that they too have the necessary organisational and technical measures in place to protect your personal data.

Your data may be shared by the Scheme's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. In such circumstances, the Scheme administrator will ensure appropriate organisational and technical safeguards are in place.

The Scheme administrator, on behalf of the Trustee, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustee's **legal obligation** to run the Scheme in accordance with the Trust Deed and Rules. This may include passing personal data to third parties at your request for example where you are considering transferring your pension to another authorised pension arrangement or provider. In this case we will assume that you have satisfied yourself that the third party has appropriate organisational and technical measures in place to safely process your personal data.

The Trustee and / or administrators may contact you directly in order to provide relevant information, pay benefits, or to deal with your queries.

In addition, it is in your and the Trustee's **legitimate interests** to use your personal information to:

- Keep up to date and accurate records about your membership of the Scheme so that the correct benefits can be paid
- Undertake risk-management exercises so that the risk your benefits are not paid is reduced

- Comply with the law, including regulations and guidance issued by the Pensions Regulator so that you, the Trustee and the Scheme advisers are not subject to legal sanctions which may impact benefits
- Efficiently manage the impact of any change to the legal status of the sponsoring company so that your benefits are not adversely affected for example by a sale or company merger

The Scheme Actuary uses your personal data to advise the Trustee on the financial management of the Scheme. This will include the carrying out of actuarial, statistical and financial modelling to advise on liability, funding and investment matters. This advice helps to ensure the Trustee is able to meet its obligations to pay members' benefits and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary will share your personal information with the Trustee and the Scheme Administrator but will not pass your personal data to any other third party without the prior agreement of the Trustee.

In certain circumstances your personal data may be processed in countries outside the European Economic Area (EEA), which are not covered by the UK GDPR. For example, third party providers may store certain data in a country outside the UK and the EEA. In such circumstances we will ensure appropriate safeguards are in place in accordance with the applicable laws. Further details on the steps we take to protect your personal data in these cases are available from the Data Controller at the address above.

Your rights in relation to your data

Individuals have the right to be informed about the collection and use of their personal data. The purpose of this Privacy Notice is to fulfil your right to be informed about the collection and use of your personal data. In addition:

- You have the right to access your personal data, i.e. request to see the personal data held about you.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to request that your personal data is deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to lodge a complaint about the Data Controller with the ICO.

If you would like to discuss or exercise any of these rights, please contact the Data Controller at the address above.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustee may not be able to perform their duties in relation to the Scheme, and your benefits could be affected.

If you have any concerns about how we use your personal data, you may raise a complaint with us using the contact details set out on page 1. We will investigate and respond in accordance with our complaints handling process. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters.

Further details about UK GDPR and your rights under UK GDPR can be found on the ICO's website at https://ico.org.uk/

Lawful Basis

The Trustee as Data Controller must have a valid 'lawful basis' in order to process personal data. There are six available lawful bases for processing. This Privacy Notice is required to inform you of the lawful basis of processing your personal data and these are:

"Legal Obligation". The Trustee has a legal obligation to process your personal data to comply with the law. In relation to the Scheme, this means pensions law, regulations and statutory guidance issued by Regulators.

"Legitimate interests". The Trustee has a legitimate interest in processing your personal data to achieve the proper administration of the Scheme and payment of benefits as they fall due. There are three elements to the 'legitimate interests' test and we confirm these have been met.

Issued jointly by:

The Trustee and Scheme Actuary
Volvo Construction Equipment Pension & Life Assurance Plan
Dated April 2026