Canada Life UK Division Staff Pension Fund

Privacy Notice - personal information and what we do with it

This Privacy Notice has been prepared by Canada Life UK Staff Pension Trustee Limited (the "Trustee"), as Trustee of the Canada Life UK Division Staff Pension Fund (the "Fund"). Throughout this Privacy Notice, "we", "us" and "our" refers to the Trustee.

We need personal information about you to run the Fund and pay benefits.

In legal terms, we are the data controller in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

In this notice, you will see information about what we do with your personal information. We will also explain who to contact if you wish to exercise your rights under data protection laws in relation to the use we make of your information.

What personal information we have

We normally hold some or all of the following types of personal information:

- Your name (and previous or alternate names), date of birth, national insurance number (NINO) and/or partial or "dummy" NINO, and bank account information (where benefits are in payment).
- Contact details (including your address, phone number and email address).
- If your benefits from the Fund derive from your employment, details of your employer when you were building up benefits in the Fund, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information we might need to pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Fund form part of a divorce settlement, details of that settlement.
- Electronic "pension identifiers" for pensions dashboards (explained below).
- "Value data" for pension dashboards, which includes details of how much pension you have built up and how much you may have when you retire, and other view data relating to you for pensions dashboards.

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Fund, or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Fund benefits.

Where we get personal information from

Some of the information we have comes directly from you. In addition, Hymans Robertson, who administers the Fund on behalf of the Trustee, may have obtained information from you and passed it to us. We may then in turn pass information about you to our professional advisers or may instruct the administrator to do so. The Trustee is the source of the personal information which our professional advisers have about you.

Sometimes we get information from other sources: for example, from your Fund employer (for information such as your salary and length of service); from pensions dashboards (details as below); from another scheme if you have transferred benefits from that scheme; from government departments such as HMRC and DWP; or from publicly accessible sources (e.g. the electoral roll) if we have lost touch with you and are trying to find you. We may in turn pass this on to our professional advisers.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Why we hold personal information and how we share it

We must by law provide benefits in accordance with the Fund's governing documentation and must also meet other legal requirements in relation to the running of the Fund.

We will use your personal information to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud. For these reasons we may need to share your personal information with other people, such as courts or law enforcement agencies.

The Trustee also has a legitimate interest in properly administering the Fund. This includes: paying benefits as they fall due; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Fund governance are met (including standards set out in Pensions Regulator guidance). In certain circumstances, we may also process your personal data because it's necessary for a 'recognised legitimate interest'. This means a purpose recognised as legitimate under the data protection laws, such as: detecting, investigating or preventing crime, including fraud; sharing information with a public authority that needs it to carry out its functions; or safeguarding a vulnerable individual.

In order to achieve this, we may share your personal information with various people, including: trustee directors; pensions dashboards (details as below); the Fund employers; the Fund administrator; our professional advisers, auditors and insurers; HMRC; the Pensions Ombudsman; IT and data storage providers and other service providers. If your benefits are transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

When we need to use information about your health (or other very personal information), we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use this information without consent, and we will do so where that is necessary to run the Fund in a sensible way. You can withdraw your consent at any time by contacting us using the contact details below. This may affect what we can do for you, unless we have another lawful reason for using your information.

The Trustee may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Fund.

The Fund's employers may also have a legitimate interest in contacting you about your benefits under the Fund, and any additional options which may be available to you in relation to those benefits. In such circumstances, we may share your personal information with the employers so that they can contact you for that purpose.

Pensions Dashboards

The Pensions Dashboard Programme (PDP) is a government initiative that will enable people to view their pension information securely in one place online through the 'pensions dashboard'. The Trustee is legally required to make certain member data available to support this service. This means your pension information will be shared securely to the 'dashboards ecosystem'. The dashboards ecosystem is the secure network of systems and organisations that will enable pensions dashboards to operate. It helps to verify your identity, locate your pension benefits and display information about you when you choose to access the pension dashboard. The PDP is currently being developed and tested, with pension schemes and providers connecting to the dashboards ecosystem before the service is made available to the public.

As the Fund's administrator, Hymans Robertson will manage the necessary data uploads on behalf of the Trustee using secure encrypted methods in compliance with UK data protection law and the technical and security standards set by the PDP. Hymans Robertson will use an integrated service provider for this who we appoint (via Hymans Robertson) to help us connect to the dashboard ecosystem, match people with their pensions and comply with our other dashboard duties.

We must also provide certain pensions information and member data to the dashboards ecosystem (which includes an identity service, a pension finder service, and a consent and authorisation service) so that it can be displayed when members ask to see it on the dashboard.

We may also need to report information (which could potentially include personal data) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.

Some of your personal data may be collected indirectly through the dashboards ecosystem. Where we obtain personal data from the dashboards ecosystem, or during the process of matching members with their Fund benefits for dashboards purposes, we will retain that data as part of the member record. This will help demonstrate how and why we concluded that the person is a member entitled to receive information about their benefits on dashboards and to help us administer the Fund.

Pensions dashboards regulations impose a legal obligation on us to match members with their pensions and provide information on their pension benefits. From a data protection law perspective, this justifies our use of data for complying with those regulations. Testing data and getting ready for pensions dashboards compliance can also be part of our legal obligations.

How to contact the other people we give your personal information to

Some of the people mentioned above just use your personal information in the way we tell them. However, others, including the professional advisers, may make their own decisions about the way they use this information to provide their services, perform their functions or comply with their regulatory requirements. In such a case, they have responsibilities as data controllers in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them too.

If you want information from any of the people who receive your personal information from us, or to exercise your rights in relation to the information they hold, please contact Hymans Robertson using the contact details below.

How long we keep your personal information for

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Fund and pay any benefits due to, or in respect of, you.

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the majority of the personal information that we hold will be kept for 75 years from the end of the Fund year in which the last payment from the Fund is made to, or in respect of, you.

Data on the pensions dashboards ecosystem is kept for the life of your member record if we do find a match (i.e. if you are a member of the Fund). If we don't find a match (i.e. if you're not a member of the Fund), none of your data will be recorded. If we find a potential match, we will keep the data from the dashboard for 30 days in a token form - this is a security step. During that 30 days we will determine whether there's a positive match or no match. We will delete the data (i.e. the token) after 30 days if there is no match or no follow up contact from you to support our determining of the match. We will keep the data for the life of your member record if we do find a match within 30 days.

It's possible that some of the Fund's former service providers may continue to hold information about you for their own record-keeping purposes once they have ceased to be involved with the Fund. If they do they will be data controllers in their own right and their own privacy notices will apply to what they retain.

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you; and
- make a complaint to the Trustee as your data controller (more on this below).

You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant. To exercise these rights, please use the Fund administrator's contact details, which are set out below. The Fund administrator can also supply more information about these rights to you, on request.

If the Trustee makes the automated decisions mentioned in the list of rights above, the Trustee is required to ensure that safeguards for your rights, freedoms and legitimate interests are in place, including measures which:

- provide you with information about such decisions taken in relation to you; and

- give you the opportunity to make representations, obtain human intervention and enable you to contest such decisions.

The Trustee does not currently make these automated decisions. If that changes we will update this section.

Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

We would make sure that appropriate safeguards are in place. We would require the Fund's administrator and other service providers to do the same. These safeguards may include using:

- Standard data protection clauses approved under UK data protection laws (the UK addendum to the EU standard contractual clauses), or
- Binding corporate rules approved by the ICO (defined below).

In addition, a risk assessment (called a data protection test) would need to be carried out to assess and put in place measures to reduce any identified risks.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Queries, data protection complaints, and further information

If you would like more information about how we use your personal information, this Privacy Notice or your rights under data protection law, please contact the Trustee via the Fund administrator using the contact details below.

If you are not happy with the way in which your personal information is held or processed, or believe that your data protection rights have been infringed, you have the right to raise a complaint with us.

If you make a data protection complaint, we will acknowledge your complaint within 30 days of receiving it. We will then take appropriate steps to investigate and respond to your complaint without undue delay, taking into account the nature and complexity of your complaint. We will also tell you the outcome of our investigation. If you make a data protection complaint within a pensions-related complaint through our internal dispute resolution procedure (IDRP) for the Fund – we will separate it out because different timings apply to IDRP.

What to include in your data protection complaint:

- your name and contact details;
- what happened and why you feel it is wrong;
- key dates, such as when the issue started and what happened along the way;
- any supporting information you can provide; and
- what outcome you want (for example, a correction, an explanation, or a change in how we use your data).

We will tell you if we need more detail.

You can ask someone to act for you. We may need proof they can do this, to protect your privacy. We may also need proof of their identity to be sure of who they are. Proof we might ask for includes an assigned letter of authority from you or a power of attorney.

We may sometimes need to ask you to confirm your identity (for example, if you are a member we have lost touch with). We will only ask you for what we need. This is to ensure we can protect you and your information.

Here is what we will do when we receive your complaint:

<u>Step 1 – Acknowledgment</u>

You should expect to receive an acknowledgement from us within 30 days from receipt of your complaint. This acknowledgment will tell you if we need any more documents from the person representing you, if relevant, or if we need any more details from you in order to deal with your request.

Step 2 – Find out if anything went wrong
We will look at the facts of your complaint carefully and gather any information we need to understand your concern. We may ask you follow up questions if we need to. We will then take steps to deal with your complaint without undue delay.

Step 3 – Tell you the outcome
We will respond to your complaint and explain to you what we found, what we did about it (if any action is needed) and what happens next.

If you wish to exercise any of your rights in relation to your personal information, make a data protection complaint, or have any other questions about the Fund, please contact the Trustee via the Fund administrator:

Hymans Robertson
Canada Life UK Division Staff Pension Fund
PO Box 27170
Glasgow
G2 9NF

Tel: 0141 227 9743

Email: canadalifepensions@hymans.co.uk.

If you are not happy with our response, you can raise a complaint with the Information Commissioner's Office, soon to be replaced by the Information Commission (ICO). The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (https://ico.org.uk/). The ICO can be contacted by calling 0303 123 1113 or via its website at https://ico.org.uk/make-a-complaint/data-protection-complaints/.

This DPN can also be accessed on our website, www.canadalifepensions.co.uk or is available upon request.

This DPN is dated 19 August 2026.

Scheme Actuary

The Scheme Actuary is appointed by the Trustee to value the Fund benefits and carry out other calculations in relation to your Fund benefits. The Scheme Actuary will use your personal information for this purpose and has a legitimate interest in doing so. The Scheme Actuary will also use your personal information to comply with their own legal obligations and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. The Scheme Actuary may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

Sometimes, your information may be used by the Trustee and the Scheme Actuary for statistical research, but only in a form that no longer identifies you. In some circumstances the Scheme Actuary may also be able to fulfil the purpose mentioned above using information which the Trustee has anonymised before sharing with them.

The Scheme Actuary has provided further details on their use of your personal data below.

Hymans Robertson (and, where appointed, the Scheme Actuary - together "Hymans Robertson") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension fund. In doing so, Hymans Robertson will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which Hymans Robertson use personal information will include management of the pension fund and your membership within it, funding the pension fund (i.e. helping to ensure that the funds within the pension fund are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension fund), Scheme Actuary duties (which include assessing individuals who are members of the pension fund and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension fund appropriately), regulatory compliance, process and service improvement and benchmarking.

Hymans Robertson may pass your personal information to third parties such as financial advisers and benefits providers, 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 Hymans Robertson'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 **www.hymans.co.uk/trust-centre** or you can request a copy by contacting us, including reference to the fund name, at: Data Protection Officer, Hymans Robertson, PO Box 27170, GLASGOW, G2 9NF.