Bridon Group (2013) Pension Scheme (“the Scheme”) Updated Data Privacy Notice

Please read this privacy notice carefully as it contains important information about who we are, what personal data (information) we hold about you, how and why we collect, store and use it, how we may share this information and your rights in relation to your personal information.

Who we are

Capital Cranfield Pension Trustees Limited as the Trustee of the Bridon Group (2013) Pension Scheme ("the Scheme") collect and use certain personal information about you. When we do so, we are subject to the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018. We are responsible as ‘controllers’ of that personal information for the purposes of those laws. As controllers, we must provide you with the information contained in this privacy notice.

Capital Cranfield Pension Trustees Limited (Company Number 05125293) has its registered office at 42 New Broad Street, London, England, EC2M 1JD.

Personal data we collect about you

Personal data is any information relating to an identified or identifiable individual.

We hold the following personal data about you in the course of acting as Trustee of the Scheme, including:

- personal details such as your name, date of birth, gender, contact details (i.e. address, home and mobile phone numbers, email address) and national insurance number;
- employment details such as your employment history (including any breaks in service or where service has been transferred in), pensionable service records, salary information, contribution records;
- details about your family and personal circumstances, such as your marital status, details of your spouse/civil partner, dependants, other family members and death benefit nominated beneficiaries;
- financial details such as your bank account and tax information;
- if you have accessed a Pensions Dashboard (an online platform where individuals can access information about all of their pension benefits) we may collect an identifier, used to identify your benefits within the Scheme.
- online information such as cookies and IP address (your computer’s internet address)

We may also hold 'special categories' of personal data (i.e. sensitive information which comes with additional safeguards under data protection legislation). This may include information about your health, including any medical conditions (for example, if you apply for ill-health early retirement). It may also include data about your partner and sexual orientation (for example, if benefits are to be paid to your spouse or partner).

How we collect the information

We may collect this information from:

- you (for example when you fill in a pension form, when you contact the Scheme with a query or complaint);
- your employer;
- another pension arrangement (if you have transferred benefits into the Scheme);
- an existing member of the Scheme (if they choose to nominate you for the death benefits that may be due on their death);
- persons acting on your behalf;
- service providers who help us trace members with whom we have lost contact

How we use your personal information

We will typically use this information for the following purposes:

- to contact you;
- to respond to individual queries, complaints and disputes;
- to calculate, provide and assess eligibility for Scheme benefits;
- to comply with obligations arising from administering the Scheme;
- to determine and implement alternative ways of providing Scheme benefits (e.g. by way of a lump sum and/or pension, transfer to another scheme, the purchase of an insurance policy, a merger with another pension scheme);
- to determine and manage Scheme investments and risks
- to determine and manage Scheme liabilities and funding requirements;
- in connection with any corporate activity a Scheme employer may be engaged in;
- to comply with our legal obligation to connect the Scheme to the Pensions Dashboards digital architecture so that members can view information about their benefits securely online

Reasons we can collect and use your personal information

The lawful basis on which we collect and use your personal data will usually be one or more of the following:

- to comply with a legal obligation (e.g. our obligations to you as trustee to administer the Scheme so that you can receive the benefits you are entitled to and make transfers to other schemes);
- for the performance of a contract with you, or to take steps to enter into a contract;
- for the purposes of our legitimate interests in running the Scheme properly or those of a third party (e.g. your employer), but only if these are not overridden by your interests, rights or freedoms.

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. In any other circumstances where we need to process special categories of personal data we will seek your prior consent.

Where we are carrying out processing on the basis of your consent, you have the right to withdraw that consent at any time by contacting us on the details provided. Any withdrawal of consent will not impact on the lawfulness of the processing which took place prior to the withdrawal.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to the information we collect or to the purposes for which we collect and process it.

Who we share your personal information with

We share your personal data, including your name, date of birth and address details, with our Scheme administrators, actuaries, advisers, bankers and investment advisers. This data sharing enables us to continue to administer the Scheme in a compliant manner and to ensure our duties as trustee are discharged lawfully. We may also share some (or, where relevant, all) of your personal data (including in anonymised form) with appropriately licensed and regulated insurers in relation to securing your benefits under the Scheme.

We will share personal information with law enforcement or other authorities if required by applicable law.

We may share personal information with a Scheme employer; e.g. in connection with member option exercises an employer may want to run in connection with the Scheme.

We may share personal information with third parties that form part of the Pensions Dashboard ecosystem to allow us to comply with our legislative duties. This may involve sharing personal data with non-commercial dashboards and commercial dashboards and with the providers (including the Integrated Service Provider (ISP) and Scheme administrators) appointed to help us connect to the dashboard, match member data and comply with our Pensions Dashboard duties.

As part of these dashboard duties, we may also need to report information (which may include personal data) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority and any dashboard you choose to use.

We will not share your personal information with any other third party.

Third-party service providers such as the Scheme administrator are required to protect your personal information in line with our policies and we only permit them to process your personal data for specified purposes.

How the Scheme Actuary uses your data

The Scheme Actuary also acts as a Data Controller and uses your personal data to advise the Trustee on the financial management of the Scheme. This advice helps to ensure the Trustee is able to meet its obligations to pay members' benefits and is necessary to comply with obligation placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI), which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

Transfer of your information out of the UK

In certain circumstances, your personal data may be processed outside of the UK.

If we (or our service providers) process personal data outside of the UK, we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this privacy notice and in accordance with safeguards required by applicable laws.

How long we keep personal data

We will hold and process your data for as long as we are legally required to do so, i.e. while we are responsible for the payment of benefits from the Scheme or for protection of our legitimate interests, and will do so in line with regulatory requirements. As pension benefits are a long-term undertaking, this inevitably means that your personal data will be kept for a long period of time, including after you have ceased to be entitled to Scheme benefits (to deal with any queries or complaints which may arise in relation to the administration of the Scheme or in the event of a legal claim to show that we have administered the trust correctly). This means it is not possible to give a specific period for which the data will be stored. Personal data will typically be held until the Scheme has wound-up.

YOUR RIGHTS

Under the UK GDPR you have a number of important rights free of charge. We will fully respect your rights under the Regulations including:

- fair processing of information and transparency over how we use your use personal information;
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address, except in limited circumstances;
- make a subject access request for free and which can be made electronically. We will respond to your subject access request within one month of you making it, unless we first need to verify your identity.
- make a subject access request to verify the lawfulness of the processing we are carrying out. We will respond to your subject access request within one month of you making it, unless we first need to verify your identity.

- require us to correct your personal data if it is inaccurate, incomplete or out of date or request the deletion of your personal data;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information;
- otherwise restrict our processing of your personal information in certain circumstances; and
- complain to the supervisory authority whose contact details are set out below.

For further information on each of those rights, including the circumstances in which they apply, see the Information Commissioner Office guidance at - https://ico.org.uk/for-the-public/.

If you would like to exercise any of those rights, please:

- email, call or write to us, and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information. If you have concerns about how your personal data is being used, we have procedures in place for handling data protection complaints. Youyou may raise a complaint with the Trustees via the Trustee Internal Dispute Resolution Procedure. You can obtain a copy of this by writing to the Scheme administrators at the address below. We will acknowledge your complaint within 30 days and respond without undue delay.

The Trustee of the Bridon Group (2013) Pension Scheme
c/o Spence & Partners Limited
Linen Loft
Adelaide Street
Belfast
BT2 8FE

Email: admin@spenceandpartners.co.uk

Telephone: 02895 210107

You also have the right to complain to the Information Commissioner. Their address is as follows:

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

Alternatively, you can contact them through their website at: https://ico.org.uk/global/contact-us/
or telephone: 0303 123 1113

Changes to this privacy notice

This privacy notice was published on 19 June 2026.

We may change this privacy notice from time to time. When we do, we will inform you. Please contact us using the details provided if your personal data changes at all.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you, including any requests to exercise your legal rights.

You can contact us at the following:

Jon Hargreaves
Bridon Group (2013) Pension Scheme
c/o Spence & Partners Limited
Linen Loft
Adelaide Street
Belfast
BT2 8FE

Email: admin@spenceandpartners.co.uk
Telephone: 02895 210107