

European Metal Recycling Limited Pension and Life Assurance Scheme

Personal information and what we do with it

The laws regarding data protection were changed with effect on and from 25 May 2018. As a result of these changes, the Trustees of the Scheme need to provide you with more detail about the personal information which they hold about you, why they keep that information and what they do with it.

The Trustees of the Scheme need to keep relevant personal information about you to run the Scheme and pay benefits. Similarly, other parties involved in running the Scheme will sometimes need to make decisions jointly with the Trustees about how your personal information will be used for those purposes. These other parties (our '**Trustee Advisers**') include the Scheme Actuary (currently David Hallam of Isio Group Limited).

The Scheme Actuary may change. If you wish to know who the current Scheme Actuary is, please refer to the most recent scheme accounts, or contact the Trustees.

In legal terms, the Trustees and the Trustee Advisers are 'joint data controllers' 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 the Trustees do with your personal information, and also what the Trustee Advisers do with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information.

Except where stated otherwise, 'we' means both the Trustees and the Trustee Advisers where they are acting as joint data controllers in relation to your personal information (as described above).

Above all, the Trustees of the Scheme want to emphasise that they are committed to keeping your personal information safe and secure.

What personal information we have

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

- Your name (and previous/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 Scheme derive from your employment, details of your employer when you were building up benefits in the Scheme, 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 Scheme form part of a divorce settlement, details of that settlement.

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 Scheme, 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 Scheme benefits.

Where we get personal information from

Some of the information the Trustees have comes directly from you. In addition, Isio Group Limited, who administers the Scheme on behalf of the Trustees, may have obtained information from you and passed it to the Trustees. The Trustees may then in turn pass information about you to the Trustee Advisers or may instruct the administrator to do so. The Trustees are the source of the personal information which the Trustee Advisers have about you.

Sometimes the Trustees get information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another scheme if you have transferred benefits from that scheme; from government departments such as HMRC and DWP; and from publicly accessible sources (eg the electoral roll) if the Trustees have lost touch with you and are trying to find you. The Trustees may in turn pass this to the Trustee Advisers (as above).

If the Trustees ask you for other information in the future (for example, about your health), it 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

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

The Trustees will use your personal information to comply with these legal obligations, to establish and defend their legal rights, and to prevent and detect crimes such as fraud. The Trustees may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

The Trustees also have a legitimate interest in properly administering the Scheme. 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 Scheme governance are met (including standards set out in Pensions Regulator guidance).

In order to achieve this, the Trustees may share your personal information with various people, including: any new trustees; the Scheme employers; the Scheme administrator; the Trustee Advisers; the Trustees' other professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman; and IT and data storage providers and other service providers. If your benefits are transferred to another scheme, the Trustees will also need to provide the administrators of that scheme with information about you.

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

The Trustees 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 Scheme.

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

In certain circumstances, the Trustees 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.

Scheme Actuary

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

Sometimes, your information may be used by the Trustees 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 Trustees have anonymised before sharing with them.

Sharing with insurers

The Trustees may share your personal data with insurers when obtaining policies of insurance in pursuit of the legitimate interests of administering and managing the Scheme and liabilities under it. Your own interests would be balanced with those of the Trustees/the Scheme when sharing happens based on legitimate interests.

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 Trustee 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 any more information from any of the people who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact the Trustees and they will put you in touch with them.

How long we keep your personal information for

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

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

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. . – see below for more detail;
- make a complaint to us if you have any concerns over how we process your personal data. The Trustees are required to take steps to help members and other people who want to make data protection complaints. We must acknowledge complaints within 30 days and respond without undue delay. If you would like to make a complaint to us, please follow our Internal Dispute Resolution Procedure, available via the Scheme administrator at ukfmepensions@isio.com; and
- make a complaint to the Information Commissioner's Office (soon to be the Information Commission) - see below for how to do this.

Additionally, under data protection laws, you have specific rights where a decision that produces a legal effect for you, or has a similarly significant effect on you, is taken based solely on automated processing (with no meaningful human involvement), including profiling.

Where the Trustees make such automated decisions, the Trustees are required to ensure that safeguards for your rights, freedoms and legitimate interests are in place, including measures

which:

- (a) provide you with information about such decisions taken in relation to you; and
- (b) give you the opportunity to make representations, obtain human intervention and enable you to contest such decisions.

The Trustees do not currently take any decisions based solely on automated processing which would produce legal or similarly significant effects on you. If that changes we will update this section.

You can exercise all of these rights free of charge except in some very limited circumstances, and the Trustees will explain these to you where they are relevant.

To exercise these rights, please use the Scheme administrator's contact details, which are set out below. The Scheme administrator can also supply more information about these rights to you, on request.

The Trustees have agreed with each of the Trustee Advisers that the Trustees will be responsible for dealing with requests from you in respect of your rights if those requests relate to the joint use of your personal information described in this notice. This means if you wish to exercise rights against the Trustees and the Trustee Advisers for what they do jointly with your personal information, you should contact the Trustees using the details below.

Information on how to raise a complaint with the Information Commission is available at www.ico.org.uk/concerns. You can also call its helpline on 0303 123 1113. The regulator will usually expect you to raise a complaint with us first before reaching out to them and we appreciate the opportunity to try to resolve your concerns.

Keeping your information safe

When the Trustees pass your information to a third party, it seeks 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 the Trustees 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.

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

Queries and further information

If you want more information about what we do with your information and what your rights are, please contact the Trustees via the Scheme administrator at ukfmepensions@isio.com.

If you have concerns about the way we handle your personal information, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.

June 2026