

EA Technology Group of the Electricity Supply Pension Scheme (ESPS) – Privacy Notice

Who we are

As the Group Trustees (“the Group Trustee”, “we”, “us”) of the EA Technology Group of the Electricity Supply Pension Scheme (“the Group”), we hold certain personal information (known as “personal data”) about members and, where applicable, their dependants and beneficiaries. We need this information to run the Group and pay benefits. This Privacy Notice sets out how and why we collect and use your personal data and your rights relating to it.

Our Data Protection Obligations to you

The Group Trustees are the data controller in respect of your personal information for the purposes of data protection legislation. This means we decide which information about you we need to collect and how it is used, and we have a legal duty to respect and protect your privacy. To run the Group and calculate and pay benefits, we collect, store and process personal data about Group members, their dependants and other beneficiaries. We take the security of your information seriously and handle your personal data in an appropriate and lawful manner in accordance with data protection laws.

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 information about you:

- Your name and date of birth and gender;
- Your e-mail, phone number and home address;
- Your National Insurance number;
- Employment details;
- Details of your salary and salary history;
- Details of your bank account to pay benefits to if you are a pensioner or if we are paying a lump sum to you;
- Some tax information; and
- Details about your dependants and/or beneficiaries, including your marital status, where this is needed e.g. so that we can pay benefits following your death.

As part of running the Group, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries. This is known as “sensitive personal data”. If you apply to receive, or do receive, benefits on grounds of ill health, for example, we would have to ask you for medical and other details about your health. We will not process sensitive personal data without your explicit consent and we will provide you with a separate privacy notice if we request your consent to process sensitive personal data.

Where do we obtain your data from?

The Group Trustees obtain your information from either you personally or your employer who participates in the Group. The Group Trustees may obtain information from a relative/guardian in relation to the payment of death benefits. We may also collect information such as address details from organisations such as tracing agencies. We do this to ensure our records about you are up to date and so we have correct address details to get in touch with you about your benefits.

If you contact the Group's administrators or Trustees by telephone, they will keep a record of your call. This is so that we have an accurate record of the information you give to us and the information given to you.

This record can be important in dealing with any query or complaint you may have about the accuracy of this information.

How do we use that information?

We need to hold and use your personal data to administer the Group and comply with our obligations to calculate and pay benefits. We will not collect any personal data from you that we do not need.

Personal data relating to the Group is held on paper and on computer systems. As the “data controller”, the Group Trustees must process this information fairly and lawfully.

Who do we share it with?

We are not allowed to share personal data about you with other organisations and people, unless the law allows us to, it is in our legitimate interests to do so or you have given your consent. To run the Group and provide you with benefits, it is necessary for us to share your personal data with the following:

- The Group's administrator (currently Broadstone) who is responsible for the day-to-day administration of the Group and payment of benefits on behalf of the Group Trustees;
- The employers who sponsor the Group to help them understand the amount of benefits payable on your retirement or death;
- The Group's professional advisers, including the Group actuary, Group and Scheme auditor, Group Trustees' Secretary, lawyers, annuity provider, GMP Equalisation actuarial adviser and risk transfer adviser. The Group actuary will be using personal data as a joint data controller with the Group Trustees for the purpose of calculating benefits and verifying risks associated with the Group;
- HM Revenue & Customs and other statutory bodies (such as the Pension Protection Fund, Pensions Ombudsman and the Pensions Regulator); and
- Tracing agencies who assist the Group Trustees with updating Group data from time to time, such as addresses of members we have lost contact with – they will usually obtain information from public sources, such as electoral rolls and death registers.

Information about the Group's professional advisers and the Group Administrator can be found in the Group's annual report and accounts which you can ask us for, free of charge.

The Group Trustees do not export personal data to a country outside of the European Economic Area (EEA).

Security of Data

The Group Trustees take the security of your personal information seriously and we and our advisers and service providers have appropriate security measures in place.

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 Group, their name and address, and details of benefits paid) for a minimum of 6 years. However, given the nature of pension schemes, the Group Trustees will keep personal data relating to scheme members for as long as they (or their dependants or beneficiaries) have an entitlement to any form of benefit; and for such further period as may be appropriate to reflect the possibility of further enquiries in to the Group Trustees conduct in administering the benefits to the affected individuals.

We review the personal data held in relation to the Group on a periodic basis in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, that personal data will be destroyed securely.

Your rights

- You have the right to see personal data that is held about you;
- If at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected;
- You can require the Group Trustees to restrict/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, although the Group Trustees can override this objection in specific instances;
- 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)), although this could mean we are unable to pay or continue to pay benefits to you; and
- You can request that your personal data is deleted altogether in certain circumstances - your right to delete information will be limited as all the information we hold about you is likely to be needed to calculate your benefits and comply with our legal obligations relating to running the Group.
- You have a right to complain to the Group Trustees about how we use your personal data. Please see contact details below.

There is also a right under the GDPR to receive your personal data (in a structured, commonly used and machine-readable format) and to transfer your data to another service provider or data controller. This right applies where your data is being processed on the basis of your consent or in line with a contract to which you are party. Please note that for the majority of members, this is not applicable as we collect and process your data on the basis we have to do this to comply with our legal obligations to run the Group and calculate and pay your benefits rather than individual consent or contracts.

You should be aware that taking any of the above steps could affect the payment of your benefits and our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Group Trustees can charge a reasonable fee in certain circumstances.

Changes to the Privacy Policy

The Group Trustees may amend this privacy policy in the future. Details of amendments will be included in further announcements.

Who to contact about your personal data

If you wish to see your personal data or to exercise any of the rights mentioned above, please contact:

The Chair of Trustees of the EA Technology Group of the ESPS
c/o Broadstone
2 Rye Hill Office Park
Birmingham Road
Coventry
CV5 9AB

Email: eatech@broadstone.co.uk
Telephone 02476 472 544

If you wish to make a complaint about how the Group Trustees have handled your personal data please contact:

The Chair of Trustees of the EA Technology Group of the ESPS

Catherine Edmondson
Independent Governance Group
4th Floor, Cannon Place
78 Cannon Street
London
EC4N 6HL
Tel: 07467 998 608

E-mail: catherine.edmondson@weareigg.com

Your complain will be acknowledged within 30 days and investigated and responded to without undue delay.

Making a complaint to the Information Commissioner's Office (ICO)

The ICO is the UK body responsible for the enforcement of the General Data Protection Regulation and the Freedom of Information Act. It is an independent authority that upholds information rights in the public interest, promotes openness by public bodies and data privacy for individuals.

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose contacts details are below. Please note that you can only complain to the ICO if you have first brought your complaint to the Group Trustees:

Helpline: 0303 123 1113
Postal address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: <https://ico.org.uk>

**Issued by the Trustees of the EA Technology Group of the Electricity Supply Pension Scheme
June 2026**