

The Toolbank Retirement Benefits Scheme (the "Scheme")

Privacy Notice

This notice explains how the Trustees of the Scheme (the "Trustee") uses and protects the Personal Data that it holds about members and other beneficiaries of the Scheme. Contact details on behalf of the Trustee are set out at the end of this notice.

The Trustee is a "data controller" for the purposes of the data protection laws. The current data protection laws are set out in the General Data Protection Regulation, which came into effect from 25 May 2018.

You should share this notice with your family and dependants where you have provided us with Personal Data about them.

What is Personal Data?

Personal Data broadly means information that identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual.

This includes any information provided to us by or on behalf of you by your employer, HM Revenue & Customs or any other Government or regulatory body in relation to your actual or potential membership of the Scheme.

What types of Personal Data might we hold about you?

We will collect and process the data about you that you provide by filling in forms and by corresponding with us or our service providers and advisers by telephone, email or otherwise. We will also collect and process data about you that is provided to us by Dormole Limited or any of the Scheme's employers or by HM Revenue & Customs.

We may hold and process any or all of the following Personal Data about you:

- personal details such as your name, gender, age, date of birth, contact details (e.g. your address and postcode, email, telephone and mobile numbers), and identifiers such as your National Insurance number, pension or member reference number and employee number (where applicable);
- details of your family, lifestyle and social circumstances. These could include details about your current marriage or civil partnership, any previous relationships and details of your family and dependants;
- employment details such as your earnings, length of service, employment and career history and job title;
- other financial details such as any other income, other pension arrangements, bank account details (e.g. to process pension payments) and tax code;
- information about your physical or mental health (where there is a legal basis for the processing of such data under the Data Protection Laws – see below);

- information about criminal convictions if these relate to money owed to the Scheme's employers in circumstances where they are entitled to be reimbursed from your benefits.

Why do we hold this data?

We hold this data because we need it to administer the Scheme. Without your Personal Data, we cannot provide you and your dependants with the correct benefits, at the right time. For example, we may need this data to verify your membership of the Scheme, to calculate your pension, to assess whether you are entitled to a specific benefit or how the tax rules apply to you.

We may use unique identifier information, such as your National Insurance number, pension or member reference number and employee number (where applicable) for the purposes of sending communications to you and verifying your identity.

In some instances, we may need to hold and process data relating to your physical or mental health, for example if you are applying for a pension on grounds of ill-health. We will ask for your explicit consent to this, unless there is an alternative legal basis for processing this data under the Data Protection Laws. Once you have given your consent, you can withdraw it at any time by writing to us using the contact details below.

Using your data in accordance with Data Protection Laws

Data Protection Laws require us to meet certain conditions before we are allowed to use your Personal Data in the way described in this privacy notice.

We rely on a condition that allows us to use your Personal Data to comply with our legal obligations in relation to the Scheme. We also rely on a condition known as 'legitimate interests' in order to use this information in the way described in this privacy notice. We have a legitimate interest in collecting and processing your Personal Data as we need this data to administer the Scheme and to provide benefits to you and your dependants.

We will only process "special categories" (for example, racial or ethnic origin, health information, religious beliefs or sexual orientation) of Personal Data where you have explicitly consented to this or where there is an alternative legal basis for processing this information under the Data Protection Laws. This may mean that you will be asked to sign consent forms in the future. If you don't consent to our processing this information when asked to do so, we may be unable to pay benefits to you or your dependants. Once you have given your consent, you can withdraw it at any time by writing to us using the contact details below.

We will keep the amount of Personal Data collected and the extent of any processing to the minimum required.

We will only process information about criminal convictions if these relate to money owed to the employer in circumstances where the employer is entitled to be reimbursed from your benefits and either you consent to this or the processing is necessary for the exercise of a legal claim by the employer.

What do we do with the data?

We may use your Personal Data for a number of purposes relating to the administration of the Scheme, including the following:

- to calculate and pay benefits. This includes providing you with details of your benefits and options under the Scheme and dealing with any queries that you have about these;
- to carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information, benefits and services that you request from us;
- to notify you about services provided to members of the Scheme and any changes to those services or to enable you to access those services;
- for statistical, financial modelling, funding and accounting and reference purposes;
- for internal record keeping;
- for risk management purposes, including the insurance or management of risks or of the Scheme's benefits;
- complying with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by any relevant regulators, government departments and law enforcement or tax authorities or in connection with any disputes or litigation; and
- in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of Dormole Limited's business.

How long do we keep your data for?

We will hold your Personal Data on our systems for as long as is necessary for the Scheme to provide benefits to you or your dependants.

So, for example, if your pension is paid from the Scheme when you retire, we will hold your information for the rest of your life, until your pension ceases on your death. If a pension is payable to any of your dependants after your death, we will continue to hold your information until their pensions cease. We will also continue to hold your information for an indefinite period after all benefits payable to you and your dependants have ceased, in case there are any further queries about your membership of the Scheme.

If you cease to be a member of the Scheme (e.g. because you transfer your benefits to another pension arrangement), we will hold your information for as long as you are a member and for an indefinite period after you cease to be a member, in case any further queries arise about your membership of the Scheme.

Who do we share the data with?

We share your data with the Scheme's administrator, which is currently Mercer Limited, and Aviva, with whom your pension benefits have been insured. Where required for the purposes of administering the Scheme, we may also share your information with:

- the Scheme's service providers, professional advisers and auditors. This includes the Scheme actuary (who is Mick O'Loan FIA) and his employer Mercer Limited. It also

includes the Scheme's Secretary, legal advisers, auditors, insurers, investment managers, banks and other organisations that advise the Trustee;

- any financial adviser or other organisation appointed by you where you have asked us to provide them with details of your benefits under the Scheme;
- any other person who is authorised to act on your behalf;
- Dormole Limited and their professional advisers;
- regulators, government departments, law enforcement authorities, tax authorities and insurance companies;
- any relevant ombudsman, dispute resolution body or the courts; and
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of Dormole Limited's business.

The entities listed above may also share Personal Data with their own business suppliers, for example in relation to the operation of IT systems or where they outsource part of their services or when an insurer looks to reinsure certain risks.

Some of these entities may also be controllers under the Data Protection Laws. However, in the first instance you should contact the Trustee using the contact details below if you have any queries.

Please note that some of the Scheme'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 Scheme.

Where we store your Personal Data

The data that we collect from you will usually be stored inside the UK or the European Economic Area (EEA).

However, if you live or work outside of the UK or the EEA, we may need to transfer your Personal Data outside of the UK or the EEA to respond to any queries that you may have. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

We also may transfer data outside the UK or the EEA where the Scheme's service providers or professional advisers host data outside the UK or the EEA. Where we do this, we will ensure that the transfer is to a country covered by a decision of the Commission of the European Union or is otherwise made in circumstances where we have put appropriate safeguards in place to protect your data in accordance with the Data Protection Laws.

What security do we have in place for Personal Data?

We have put in place appropriate security measures to protect your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to third parties who have a business need to know (see "who do we share the data with?"). They will only process your Personal Data to administer the Scheme and at our instruction and they are subject to a duty of confidentiality.

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

Your rights in relation to your Personal Data

The accuracy of the information that we hold about you is important to us. If you believe any of the information that we hold about you is inaccurate or out of date, please let us know using the contact details set out at the end of this notice.

You have a number of rights under the Data Protection Laws in relation to the way we process your Personal Data, namely:

- to access your data (including printed copies of it);
- to have your data rectified if it is inaccurate or incomplete;
- in certain circumstances, to have your data deleted or removed;
- in certain circumstances, to restrict the processing of your data;
- a right of data portability, namely to obtain and reuse your data for your own purposes across different services;
- to object to direct marketing (although we do not carry out direct marketing);
- not to be subject to automated decision making (including profiling), where it produces a legal effect or a similarly significant effect on you (although we do not use automated decision making); and
- to claim compensation for damages caused by a breach of the Data Protection Laws.

If you wish to exercise any of these rights, please contact Fay Robinson, Dalriada Trustees, using the contact details below.

We will aim to respond to any request received from you within one month from your request. Access to your data will usually be provided free of charge, although in certain circumstances we may make a small charge where entitled to do so under the Data Protection Laws.

Please note that we may be unable to delete or remove your data whilst we still need this to administer the Scheme – see the section 'How long do we keep information for?' above.

Any complaints?

If you are not happy with the way in which your Personal Data is held or processed, please contact us using the details below. You also have the right to complain about data protection matters to the Information Commissioner's Office (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.

Changes to this privacy notice

This privacy notice is current as at 12 June 2023.

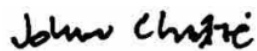
We keep our privacy notice under review and may change it at any time. We will tell you about any significant changes.

Contact us

If you have any queries about this privacy notice, or wish to exercise any of the rights above, please contact:

Fay Robinson
Dalriada Trustees
27-37 Adelaide St
Belfast
BT2 8FE
Tel: +44 (0) 7816 223686
Email: fay_robinson@dalriadatrustees.co.uk

For and on behalf of the Trustees of the Scheme,



John Christie
Chair of the Trustees

Dated: 12 June 2023