

PPG INDUSTRIES (UK) LIMITED PENSION PLAN

DATA PRIVACY NOTICE

Who are we?

We are the Trustee of the PPG Industries (UK) Limited Pension Plan (the **Trustee, we or us**). We collect, hold and use personal information to help us run the PPG Industries (UK) Limited Pension Plan (the **Plan**).

What is this document about?

The Trustee holds certain personal information about Plan members (current and former) and, where applicable, their dependants, beneficiaries or potential beneficiaries of the Plan and in relation to certain individuals in connection with Pensions Dashboards¹ (“**Data Subjects**”). For legal purposes, the Trustee is known as the “data controller”, as we decide the purposes for and the means by which the personal information we hold is processed.

In order to comply with applicable Data Protection Legislation applicable to data controllers, we have to provide you with certain information to help you understand:

- the personal information we collect about you and how we collect it, what we do with this information and why we hold it. This is explained in more detail in section one.
- who else we get personal information from and who else we share personal information with. This is explained in more detail in section two.
- what rights you have in relation to your personal information under Data Protection Legislation and who to contact if you have any problems. This is set out in section three.

We have also included an explanation of the key terms and phrases that are used in this notice at the end of this document.

Where can I get more information?

This notice is at www.myppgpension.com/library. We also provide printed versions (including large print versions) on request.



This notice explains how the Trustee processes your personal information. Please read this notice (and any other privacy information that we send to you) so that you are aware of how and why we are using your personal information.

¹ In accordance with the Pensions Dashboards Regulations 2022 (SI 2022/1220) as amended from time to time (“**Dashboard Regulations**”).



We may change this notice from time to time. Please visit the webpage or contact us in order to receive the most up to date version of this notice. Our contact details are set out in section three of this notice.

SECTION ONE

ABOUT YOUR PERSONAL INFORMATION

What information do we collect and process?

We collect and process your personal information because you are a Data Subject. As alluded to above, we also collect personal information if you contact us in connection with your membership of the Plan or where you have used a pensions dashboard to access information about your pension benefits and you contact the Plan to resolve a “possible match” or where you are the subject of a “find request” received by the Plan under the Dashboard Regulations (see below for further details).

We may collect and process the following categories of personal information about you:

- **personal contact details** — names, titles, addresses, telephone numbers, email addresses;
- **information about you** — age, date of birth, sex, gender, marital status, dependants and next of kin (including details about your dependants and/or beneficiaries);
- **payroll information** — National Insurance numbers, payroll numbers, bank account details, tax status, salary and contribution data, and employment information;
- **pension benefits** — information about the pension and/or death benefits that you have accrued in the Plan, your pensionable service, investment choices and death benefit nomination forms; and
- **Other** — In order to properly administer the Plan and to calculate and pay benefits, from time to time we may also need to hold other personal information about you. For example, if you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, we may collect a “pensions identifier”, which is a string of characters used to identify your specific benefits under the Plan.

What sensitive personal information do we collect and process?

We usually only ask for sensitive personal information when it is required to help us make a decision in relation to your rights under the Plan. For example, we may request:

- **health information / medical records** — we may ask you to provide health information if you request payment of a benefit that can only be paid if you meet certain medical criteria (e.g. ill health early retirement benefits). In addition to receiving this information from you, we may receive medical information from third parties such as your doctor or a third party occupational health provider; or
- **other sensitive personal information** — we may ask you to provide other sensitive personal information (e.g. information about your personal relationships), for example, if it is relevant to help us decide on an internal dispute resolution procedure.

In addition, certain categories of sensitive personal information (e.g. race, ethnicity, religious beliefs and sexual orientation) may be revealed on formal documentation that we process in order to identify the recipients of benefits under the Plan (e.g. birth certificates, marriage certificates, driving licenses and passports). You may also decide to provide us with sensitive personal information voluntarily (e.g. when raising queries or making a complaint).

Except where the Data Protection Legislation allows it, sensitive personal information cannot be processed or passed to a third party without your explicit consent.

How do we collect your personal information?

When you join the Plan, you and/or your employer provide personal details so that we can create your membership record.

This information is updated whilst you are a member of the Plan, even if you have since left service with any of the Plan's employers. Updated information may come from a number of sources, including:

- you (e.g. if you get in touch to let us know a new address);
- your employer or former employer (e.g. updated salary and payroll information); and
- other third parties (e.g. the Pensions Ombudsman or someone acting on your behalf such as an independent financial adviser or if HMRC provides us with information so that we can deduct the correct level of tax).

In addition, we may request additional information in certain circumstances (e.g. if you request to transfer your benefits to another pension scheme, if you apply for ill-health benefits or when you ask for your benefits to start being paid).

Why do we process your personal information?

We use this information to:

- set up your membership record for the Plan;
- properly administer the Plan and manage your membership of the Plan;
- send you information that is relevant to your membership of the Plan;
- calculate, pay and settle any benefits that you are entitled to from the Plan;
- comply with our legal and regulatory duties;
- help manage risks and liabilities in the Plan in order to seek to be able to pay full benefits as far as possible;
- help the Plan's sponsoring employers comply with their legal and regulatory duties; and
- communicate information about the Plan to members.

What are our legal grounds for processing your personal information?

In order to comply with our legal obligations

As the Trustee of the Plan, we are under legal obligations to process your personal information in order to comply with pensions and other relevant legislation, the Plan's rules, court rulings and Pensions Ombudsman decisions. For example, the Trustee must:

- send certain information to the Plan's members;
- comply with obligations in relation to individuals using Pensions Dashboards. (This includes "matching", where we use personal data that a user has provided to search our Plan records and check if the user is a Plan member, and where we collect further personal data from that user in the event of a "possible match"); and
- the Trustee is subject to fiduciary duties under trust law to act in line with the Plan's governing documentation.

It is necessary for us to process your personal information in order to comply with these legal obligations.

In order to fulfil our legitimate interests

Processing your personal information is also lawful if it is based on our 'legitimate interests'. The Trustee has a legitimate interest in holding and processing your personal information as it is needed for running and managing the Plan and managing the Plan's risks and liabilities. In addition, certain third parties may have legitimate interests which require the processing of your personal information by the Trustee (e.g. your employer may need information in order to comply with regulatory requirements and/or the Plan's independent financial adviser may need your information to enable them to provide you with retirement advice in a streamlined manner).

In order to rely on this legal ground, we have:

- considered the impact the processing has on your interests and rights; and
- implemented appropriate safeguards to ensure that your privacy is protected as far as possible.

What are our legal grounds for processing your sensitive personal information?

There are four main legal grounds that allow us to process your sensitive personal information (sometimes referred to as special categories of personal data):

- when we obtain explicit consent from you (e.g. when you sign one of the Plan's forms which contains the appropriate consent wording);
- when processing is necessary for carrying out legal obligations under employment, social security or social protection law. This includes obligations under pensions law;
- when the individual has him/herself made the sensitive personal information manifestly public; and
- Where the sensitive personal information is required to establish, exercise or defend legal claims.

What would happen if we did not collect and process your personal information?

If we did not collect and process your personal information then:

- we would not be able to manage or administer the Plan appropriately;
- we would not be able to pay the benefits that you are entitled to under the Plan; and
- we would be in breach of our legal and regulatory duties.

How long do we keep your personal information for?

The Plan was set up to provide benefits over a very long time. The Trustee needs to maintain records in order to properly run the Plan, to determine who should receive what level of benefits and when they should receive them, and to respond to any disputes about an individual's rights under the Plan.

As a result, the Trustee will generally keep your personal information safe and hold it for as long as necessary. This is anticipated to be for the lifetime of the Plan plus 15 years (the longest period of time that someone can bring a claim against the Plan). Our service providers (and former service providers) may also have similar valid grounds to keep your personal information for such long periods. Where there is a maximum limit on how long we can keep certain personal information for, such as in relation to pensions dashboards, we will comply with that restriction.

We review the personal information held in relation to the Plan on a regular basis.

SECTION TWO

USING AND SHARING YOUR PERSONAL INFORMATION

How do we keep your personal information secure?

We use a range of measures to safeguard your personal information, in line with the requirements set out in the Data Protection Legislation. These apply to both paper and electronic records. We also require our third party service providers to give certain assurances and agree to contractual terms in respect of data protection and the security of your personal information.

What do we do with any personal information that is provided by third parties?

We receive personal information from sources other than directly from you. This includes information shared by your Plan employer, the Plan's administrator, its professional advisers, service providers and other relevant third parties.

When we receive this information, we add it to the information we already hold about you in order to help us make sure that your details are as up to date and accurate as possible and so that we can manage your membership of the Plan, and the Plan more generally.

Who do we share your personal information with?

For the purposes of administering and managing the Plan, managing its risks and liabilities, and paying benefits under it, the Trustee may need to share your personal information with third parties.

This will include your current, past or future employer (e.g. the payroll, finance, compliance, audit and HR teams). (Where data is sent outside the UK appropriate safeguards are put in place to ensure your data is kept secure.)

It will also include third parties who provide advice or services to the Trustee. These third parties may include actuaries, administrators, auditors, insurers, prospective insurers, lawyers, independent financial advisers, medical advisers, and any other such third parties as may be necessary for the operation of the Plan and to enable the Trustee to carry out its duties. These third parties may also include persons in connection with any investment changes, sale, merger, acquisition, disposal, reorganisation or similar change involving the Plan (including any counterparties, potential or actual purchaser and their advisers). The Trustee will also need to share personal information with third parties that form part of the “dashboard ecosystem” that enables pensions dashboards services to work, as well as the Plan's Integrated Service Provider (ISP), which provides a service allowing pensions information from the Plan to be connected to the dashboard ecosystem.

We've set out a list of the third party providers / advisers to the Plan with whom we share your personal information together with links to their data protection and privacy information where applicable (see Further Information, Part 3).

Our suppliers and service providers who act as data processors must act in accordance with our instructions. Some of our suppliers and service providers also act as data controllers in respect of your personal information. We've included links to their online privacy information if you want to find out more about how they process your personal information.

In some circumstances, we may have to disclose your personal information by law, because a court or the police or other law enforcement agency has asked us for it. We may also need to pass your personal information to The Pensions Regulator or HM Revenue and Customs.

We may also share your personal information with the Plan's employers to enable them to carry out activities in their legitimate interests (this is usually in connection with managing their business from a regulatory, HR or finance perspective).

SECTION THREE

YOUR RIGHTS AND WHO TO CONTACT

What rights do you have in respect of your personal information?

In certain circumstances, you have the following rights in respect of your personal information:

- the right to **object** to us processing your personal information;
- the right to request **access** to personal information relating to you;
- the right to request that we correct any mistakes in your personal information;
- rights in relation to automated decision taking;
- the right to request to restrict or prevent processing of your personal information;
- the right to request to have your personal information transferred to another data controller (e.g. if you decide to transfer your pension benefits to another pension scheme);
- the right to withdraw consent to the processing of your personal information previously provided;
- the right to request to have your personal information deleted; and
- the right to complain to us, to the Information Commissioner's Office, or to bring an action before the court, if your rights relating to your personal information are not complied with.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Plan, and/or our ability to answer questions relating to your benefits.

We've set out more information about these rights in Part Two of the Further Information section below.

How will we respond to your request?

We will usually respond to any request that you make in relation to your rights within a month of receiving your request. If your request is particularly complex, we will let you know that we've received your request and let you know when we aim to respond. You can find out more about your rights under the UK's data protection laws at www.ico.org.uk.

Under the UK's data protection legislation, there are exemptions which mean that, in certain circumstances, we may continue to store, process or transfer your personal information (for example where we need to comply with a legal requirement or have a legally valid legitimate interest in doing so) even if you ask us not to.

What should you do if you have any questions or complaints?

If you believe we are processing your personal data in a way which is inconsistent with the law and you wish to make a formal complaint, you can do so by contacting ppgpensions@aon.com.

If you are not satisfied with our response, you can complain to the Information Commissioner's Office. Information about how to do this is available on their website at www.ico.org.uk/concerns or by calling their helpline on 0303 123 1113.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to PPGpensions@aon.com or write to us at: PPG Industries (UK) Limited Pension Plan, Aon, PO Box 196, Huddersfield, HD8 1EG. Alternatively, you can call the Plan's helpline on 0330 123 4470 (or +44 330 123 4470 from overseas).

FURTHER INFORMATION - PART ONE

HOW AND WHY WE PROCESS PERSONAL INFORMATION

CATEGORY OF PERSONAL INFORMATION	WHAT WE USE THIS INFORMATION FOR	LEGAL GROUND(S) FOR PROCESSING	WHERE WE GOT THIS INFORMATION FROM
Address	We use this information so that we can send you information that we are legally required to provide you with. In addition, we use this information to get in touch with you when we need to in order to run the Plan. Finally, we use it to send you information that we think will be relevant to you as a member of the Plan.	We have a legal obligation to send certain information to members of the Plan. In addition, we may send additional information to fulfil our legitimate interest of running the Plan.	This information is initially provided by you or your employer when you joined the Plan. Your employer may share updated information if you update your records with HR. In addition, you may have updated your information by contacting us or the Plan's administrator. If a member's details are not kept up to date, we may lose contact with that member. In these cases, we may use a third party tracing agent to obtain up to date contact information.
Telephone number			
Email address			
Name and title	We use this information to identify you and to create and update your membership record in the Plan.	We have a legal obligation to pay the correct level of benefits to the correct individuals. This requires us to obtain and update this information.	The Plan's administrators may create a unique reference number so that your records can be easily identified. Your bank details provided by you when you fill in your membership form and when you update your details.
Date of birth and your Plan retirement date			
Sex			
Gender			
Marital status	We use this information to help us decide who should receive what benefits from the Plan.	We also have a legal obligation to properly identify individuals who receive or may receive benefits from the Plan.	Your tax status is provided to us by your Plan employer and/or HMRC.
Dependants			
Next of kin			
National Insurance number	We use this information to identify you and to create and update your membership record in the Plan. Your National Insurance number is also needed so that we can receive the correct information from HMRC and so that we can deduct the correct level of tax from your benefits.	The Trustee is also required to comply with tax legislation and deduct the correct level of tax from benefits.	Your salary and contribution details are provided, or have been provided, to us by your Plan employer.
Employment start and, if applicable, end dates			
Payroll number			
Plan reference number	We use this information in order to pay your benefits under the Plan directly to you.	Processing this information also fulfils the Trustee's legitimate interests in running and managing the Plan.	
Bank account details			
Tax status	We use this information to deduct the correct level of tax from your benefits.		
Salary and contribution details	We use, and have used, this information to calculate the correct level of your contributions and benefits under the Plan.		

CATEGORY OF PERSONAL INFORMATION	WHAT WE USE THIS INFORMATION FOR	LEGAL GROUND(S) FOR PROCESSING	WHERE WE GOT THIS INFORMATION FROM
Details about your entitlement to pension benefits under the Plan	We use this information to calculate the correct level of your benefits under the Plan.	See the section above	Details about your entitlement to pension benefits under the Plan may be provided by your employer or may be determined by reference to the Plan's governing documentation. In addition, the Plan's actuary and administrators will carry out calculations, the results of which will be added to your record.
Investment choices	We use this information to ensure that your additional voluntary contributions and/or money purchase benefits are invested in the correct investment fund.	We have a legal obligation to ensure that the Plan is run properly and in line with its governing documents. There is also specific legislation that governs payment of contributions into money purchase investment funds.	We (or our third party providers) provide you with information about the investment options that are available to you. You then provide us with your choices and any changes to your investment choices.
Death benefit nomination forms	We use this information as part of our decision making process when deciding who will receive death benefits.	As Trustee of the Plan, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time.	You provide us with the information that is contained on our death benefit nomination forms.
Medical information (including medical records and doctors' opinions)	We use this information as part of our decision making process when deciding ill health benefits under the Plan.		Medical information relating to you may be provided directly by you, by the Plan employer, your doctor or by a third party providing health assessments / reports.
Information about your personal relationships	This information is used to determine who is entitled to benefits in relation to your membership of the Plan.		This information is usually provided by you. In certain circumstances, we may also need to obtain information from relevant third parties.
<p>Certified copies of official documents, including:</p> <ul style="list-style-type: none"> • passport; • driving license; • birth certificate; • marriage certificate • death certificate; and • decrees nisi / absolute. 	<p>This information is used to:</p> <ul style="list-style-type: none"> • identify you; • determine the status of your relationship; • determine who may be entitled to benefits under the Plan; and • trigger certain processes in respect of your benefits under the Plan (e.g. payment of death benefits or splitting of benefits in cases of divorce). 	As Trustee of the Plan, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time. Certified copies of official documentation are sometimes essential for the Trustee to make legally valid decisions.	This information is usually provided directly by you or from your next of kin. In more unusual cases (e.g. when we are having difficulty locating a member or identifying their next of kin) publicly available official documentation may be obtained by a third party tracing agent.

CATEGORY OF PERSONAL INFORMATION	WHAT WE USE THIS INFORMATION FOR	LEGAL GROUND(S) FOR PROCESSING	WHERE WE GOT THIS INFORMATION FROM
<p>A “pensions identifier” (i.e. a string of characters used to identify your specific benefits under the Plan in connection with Pensions Dashboards) and, where applicable, any other categories of personal data you enter into a pensions dashboard system and/or other personal data the Plan already holds about you.</p>	<p>If you have used a pensions dashboard to access information about your pension benefits and you contact the Plan to resolve a “possible match” or, where you are the subject of a “find request” received by the Plan under the Dashboard Regulations the Trustee will process your personal data to determine if you do have benefits in the Plan and to satisfy the requirements of the Dashboard Regulations.</p>	<p>As Trustee of the Plan, we have a legal obligation to comply with the Dashboards Regulations which require the processing of personal data in certain circumstances.</p>	<p>This information is likely to have come from you (or on your behalf) if you have used a pensions dashboard to access your pension information. Or, where it is already held by the Plan, the source of the information will depend on the category of the personal data, as described in the remainder of this table.</p>

FURTHER INFORMATION – PART TWO

MORE ABOUT YOUR RIGHTS UNDER DATA PROTECTION LEGISLATION

As a data subject, you have a range of rights under the Data Protection Legislation. These rights are explained in more detail below. If you have any comments or concerns about our use of your personal information, please contact us directly.

You can email PPGpensions@aon.com or write to us at:

- PPG Industries (UK) Limited Pension Plan, Aon, PO Box 196, Huddersfield, HD8 1EG

Alternatively, you can call the Plan's helpline on 0330 123 4470 (or +44 330 123 4470 from overseas).

Right to object to our processing of your personal information

You may object to us processing your personal information where we are relying on a legitimate interest as our legal grounds for processing. Our legal grounds for processing are set out in section one of this data privacy notice and Part One of this Further Information Section.

If you have the right to object to processing (i.e. for personal information that we process in order to fulfil our legitimate interests or the legitimate interests of a third party) **and** you exercise this right, we will no longer be able to process your personal information **unless** certain circumstances allow it (for example, if we can demonstrate compelling grounds for continuing to do so).



The key point to note is that, if we cannot continue to process your personal information, we would be unable to ensure that we are providing the correct level of benefits in respect of your membership of the Plan. As we are legally required to pay the correct level of benefits to the right people at the right time, in these circumstances we may have to delay or even stop payments / requests until we have sufficient information.

Right to access personal information relating to you

You can ask us to confirm whether we are processing your personal information. If we are, you may ask us to provide the following:

- a copy of your personal information (please note that, if you want more than one copy of your personal information, we reserve the right to charge a reasonable fee based on our administrative costs for the provision of such further copies);
- details of the purpose for which your personal information is being, or is to be, processed;
- details of the recipients or classes of recipients to whom your personal information is, or might be, disclosed, including, if the recipient is based in a country outside of the UK or EEA (as applicable), what protections are in place in relation to the transfer to that recipient. (Note that where data is sent outside the UK or EEA (as applicable), appropriate safeguards are put in place to ensure that your data is kept secure – see “Transfers of your personal information out of the UK or EEA (as applicable)” section below);
- the period for which your personal information is held (or the criteria we use to determine how long it is held);
- any information available about where we obtained your personal information; and
- confirmation as to whether we carry out any automated decision-making (including profiling) and, where we do, information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

Requests for your personal information must be made to us in writing (see 'How to contact us') in section three above). A copy of your request will be kept on your membership record. To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person if possible.

There are certain types of information which we are not obliged to disclose to you, which include personal information which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.

Right to correct any mistakes in your information

You can require us to correct any mistakes (including adding missing information) in any of the personal information concerning you which we hold. Please contact us using the contact details set out at the beginning of this section if this applies to you.

Rights in relation to automated decision making/profiling

The Trustee does not generally use automated decision making or profiling.

Automated decision making occurs when decisions are taken solely on automated processes. Under the Data Protection Legislation, you have the right to ask that, if you are being evaluated (for example, when a bank carries out credit checks before making decisions on issuing loans or credit cards), any decisions are not solely based on automated processes and to have any decision reviewed by a member of staff.

These rights will not apply in all circumstances, for example where the decision is authorised or required by law and steps have been taken to safeguard your interests.

Right to request that we restrict the processing of your personal information

You may request that we restrict the processing of your personal information in any of the following circumstances:

- where you do not think that your personal information is accurate. In this case, we will start processing again once we have checked whether or not your personal information is accurate;
- where the processing is unlawful, but you do not want us to erase your information;
- where we no longer need the personal information for the purposes of our processing, but you need the information to establish, exercise or defend legal claims; or
- where you have objected to processing because you believe that your interests should override our legitimate interests. In this case, we will start processing again once we have checked whether or not our legitimate interests override your interests.

If our processing is restricted in any of the circumstances described above, we will inform you in advance if that restriction is to be lifted.

Right to request that we delete your personal information

You can ask us to delete your personal information where your personal information is being processed on a legal ground other than to comply with a legal obligation and:

- you believe that we no longer need to process it for the purposes set out in this privacy notice;

- you had given us consent to process it, but you withdraw that consent and there is no other legal ground upon which we can process it;
- you have successfully objected to our processing it; or
- it has been processed unlawfully or has not been erased when it should have been.

Right to request transfer of your personal information

You may, in specified circumstances, ask a data controller to provide you with an electronic copy of personal information that you have provided to it, or to have such a copy transmitted directly to another data controller.

Those circumstances do not, however, generally apply in relation to our processing of your personal information in connection with the Plan. This is because:

- our legal grounds for processing will not normally be that you have consented to the processing; and
- we do not carry out processing by automated means.

Right to withdraw consent

We usually only request your consent when we ask you for sensitive personal data. You have the right to withdraw any consent you have given us at any point.

However, as highlighted above, the Trustee only requests sensitive personal data that is required to make decisions in respect of specific member benefits or complaints. If you withdraw your consent for us to process this information, we may have to delay or even stop payments / requests until we have sufficient information.

Right to complain

You have the right to complain to the Trustee, to the Information Commissioner's Office, or to bring an action before the court, if your personal data rights are not complied with (see "Making a complaint" below).

Making a complaint

If you believe we are processing your personal data in a way which is inconsistent with the law and you wish to make a formal complaint, you can do so by contacting ppgpensions@aon.com.

If you are not satisfied with our response to your complaint, you can complain to the Information Commissioner's Office. Information about how to do this is available on their website at www.ico.org.uk/concerns or by calling their helpline on 0303 123 1113.

FURTHER INFORMATION - PART THREE

THIRD PARTIES AND TRANSFERS

For the purposes of administering the Plan and paying benefits under it, the Trustee may need to share your personal information with certain third parties. This section lists the key third party service providers with whom we share your personal information.

ROLE	THIRD PARTY	OTHER INFORMATION (IF APPLICABLE)
Actuary	Aon Solutions UK Limited	<p>Aon Solutions UK Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the Plan. In doing so Aon 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 Aon uses personal information will include management of the Plan and your membership within it, funding the Plan (i.e. helping to ensure that the funds within the Plan 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 scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the Plan appropriately), regulatory compliance, process and service improvement and bench marking.</p> <p>Aon may pass your personal information to third parties such as financial advisors and benefits providers, insurers, its 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.</p> <p>More detail about Aon's use of your personal information is set out in Privacy Notice. We recommend that you review this notice, which is available online at Aon Privacy Notice or you can request a copy by contacting Aon, including reference to the scheme name, at: Data Protection</p>

		Officer, Aon Solutions UK Limited, The Aon Centre, The Leadenhall Building, 122 Leadenhall Street, London, EC3V 4AN.
Administrator (in respect of DB benefits)	Aon Solutions UK Limited	Please see a link to Aon Solutions UK Limited's privacy notice above.
Administrator (in respect of DC benefits)	Scottish Equitable plc.	Details of Scottish Equitable plc's use of personal data is set out in its privacy notice, which you can view here: https://www.aegon.co.uk/utilities/privacy
Legal advisers	Sacker & Partners LLP	<p>Our scheme lawyers, Sacker & Partners LLP, help to ensure that obligations to the Scheme's members and other beneficiaries under the Scheme's governing documents, legislation, regulatory requirements and case law are met.</p> <p>More detail about Sacker & Partners use of personal information is set out in its privacy notice for pension scheme members, beneficiaries and client's employees, which you can view here: https://www.sackers.com/more/privacy-notice/pension-scheme-members-beneficiaries-and-clients-employees/</p>
Auditor	Crowe UK	More detail about Crowe UK's use of personal information is set out in its privacy notice, which you can view here: https://www.crowe.com/uk/privacy-policy
Sponsoring Employers	PPG (Industries) UK Limited; Brown Brothers Distribution Limited; PPG Architectural Coatings UK Limited; PPG Performance Coatings UK Limited; Prismo Road Markings Limited; Whitford Limited;	More detail about PPG's use of personal information is set out in its privacy notice, which you can view here: https://privacy.ppg.com/en-US/global-data-privacy-statement
AVC Providers	Aviva and Prudential	<p>More detail about Aviva and Prudential's use of personal information is set out in their respective privacy notices, which you can view here: https://www.aviva.co.uk/services/about-our-business/products-and-services/privacy-policy/retirement-privacy-policy/ and https://www.mandg.com/dam/pru/shared/documents/en/genm893902.pdf</p>

Independent Financial Adviser	Origen Financial Services Limited	<p>Origen have been appointed by the Trustee to provide independent financial advice to members of the Plan. For the purpose of enabling Origen to verify a member's identity when they contact Origen for the first time, the Trustee shares limited personal data with Origen (including the details of any Power of Attorney). Any further personal information will only be shared on the basis of consent once the member or Power of Attorney have engaged with Origen directly (at which point Origen will become the data controller in respect of member data held by them). Detail about Origen's use of your personal information is set out in its full Privacy Notice, which you can view here:</p> <p>https://www.origenfs.co.uk/privacy-policy</p>
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Transfers of your personal information out of the UK or EEA (as applicable)

Your information may be transferred outside of the UK or EEA (as applicable). Our service providers have confirmed that they either:

- do not transfer the Plan's data outside of the UK or EEA (as applicable); or
- do or may transfer the Plan's data outside of the UK or EEA (as applicable), but only when any such transfer complies with the requirements of Data Protection Legislation. Where this is the case, we will take reasonable steps to ensure that your personal information continues to be appropriately secured. Such transfers will generally be made relying on UK adequacy regulations. Alternatively, they may be made using the UK's International Data Transfer Agreement or, where relevant, using the UK Addendum to the European Commission's standard contractual clauses, and where we consider that the protection for the data subject's personal data would not be "materially lower" after the transfer. You can find copies of the Agreement and Addendum [here](#). These protections aim to ensure the security of your personal information, safeguard your privacy rights and give you remedies in the unlikely event of a security breach or to any other similar approved mechanisms.

FURTHER INFORMATION - PART FOUR

KEY TERMS AND PHRASES

Data controller	means the natural or legal person or other body who, alone or jointly with others, determines the purposes and means of the processing of personal data. This means that the data controller exercises overall control over the 'why' and 'how' of a data processing activity. For the purposes of this privacy notice, the Trustee is the data controller.
Data Protection Legislation	means the UK GDPR, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and, if and to the extent applicable, the EU GDPR, together with any legislation and/or regulation implementing or made pursuant to them, or which amends, consolidates, replaces or re-enacts any of the same (including the Data Protection Act 2018), and all other applicable laws relating to the processing of personal data and privacy where relevant.
Data protection principles	<p>means the principles that are set out in the Data Protection Laws relating to the processing of personal data. There are six principles:</p> <ul style="list-style-type: none"> • lawfulness, fairness and transparency; • purpose limitation; • data minimisation; • accuracy; • storage limitation; and • integrity and confidentiality. <p>In addition, there is an overarching principle of accountability</p>
Data processor	means a natural or legal person or other body who processes personal data on behalf of the data controller.
Data subject	means the identified or identifiable living individual to whom personal data relates.
EU GDPR	means the General Data Protection Regulation (EU 2016/679)
Information Commissioner's Office (ICO)	is the UK's national data protection authority. It is a public body that is charged with regulating information rights, public sector transparency and individual's privacy in the UK.
Personal data or personal information	means any information relating to an identified or identifiable natural living person and from which (either on its own or when combined with other information held by the Trustee) that individual can be identified; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number etc.
Privacy notice	means the information that is provided to inform individuals about what you do with personal data. Under the Data Protection Legislation, data controllers must provide accessible information to individuals about the use of their personal data.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Special categories of personal data (also referred to as sensitive personal data) is Plan Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information relating to the commission or alleged commission (and/or any related proceedings) of a criminal offence, and the Processing of genetic data, biometric data for the purpose of uniquely identifying an individual, data concerning health or mental or physical condition or data concerning an individual's sex life or sexual orientation.

For pension schemes, special categories of personal data are most likely to be relevant when dealing with ill-health, divorce and death cases.

UK GDPR means the EU GDPR as it forms part of domestic law by virtue of section 3 of the European Union (Withdrawal) Act 2018.