

MCL Group Limited Pension and Assurance Scheme

Privacy Notice

Who we are

As the Trustees of the MCL Group Limited Pension and Assurance Scheme (the “Scheme”) we hold certain personal information (known as “personal data”) about Scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustees in running the Scheme will be personal data.

For legal purposes, the Trustees are known as the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

For the purposes of administering the Scheme and paying benefits under it, the Trustees 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)
Scheme Actuary	Wendy Fitzpatrick, Isio	
Administrators, Actuarial & Investment Advisers	Isio	
Scheme Secretary	Ross Trustees Services Limited, part of Independent Governance Group (IGG)	
Legal advisers	Sacker and Partners LLP	
Auditor	Crowe UK LLP	

What information 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
- your gender
- your marital status
- your address and other contact details (such as telephone number and email address)
- your national insurance number
- details of your bank account (to pay benefits)

- details about your dependants and/or beneficiaries (including their names and possibly details of their gender)
- relevant employment information (including current and past salary information and employment dates)
- details about your pension benefits and previous contributions
- medical and other details about your health to process incapacity pension requests
- Divorce/pension sharing details

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you.

How we gather your personal information

Your personal data will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from the Scheme, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death. We will not collect any personal data that we do not need.

How we use that information

The Trustees have a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Scheme and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Scheme governing documents, as well as under relevant legislation.

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

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "sensitive personal data"). Under data protection legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "sensitive personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

We will not process personal information for any purpose or purposes which we have not told you about. However, there are exceptions to this. For example, if it were obvious to an individual that personal information would be processed for the new purpose or if the new purpose was in fact compatible with the original purpose(s) for which the personal information was collected.

We will not be transferring any personal data outside the European Economic Area.

Who we share it with

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or
- Where you have given your consent.

However, as the Trustees need help from various advisers to properly administer the Scheme, we share personal data with the following key service providers:

- your current, past or future employer
- the Scheme's professional advisers, including the Scheme Actuary: Wendy Fitzpatrick of Isio, Administrator Isio, Scheme Secretary: Ross Trustees Services Limited (part of Independent Governance Group ("IGG")), Auditor: Crowe UK LLP, Medical Advisers, and Lawyers: Sacker and Partners.
- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustees.
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustees can be fined and subject to other action if they fail to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you, such as any communications regarding your benefits.
- appointed insurance companies for the purpose of securing member benefits.
- depending upon how we pay pensions, the personal data we have to supply in order to effect pensions payroll in the UK or overseas.
- Appointed tracing agencies, used to trace members.

How long 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 a minimum of 6 years. But, given the nature of pension schemes, the Trustees may be required to keep some of your personal information for the rest of your life.

Your rights

- **Right of Access** – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- **Right to Rectification** – if at any point you believe that the personal data we hold about you is wrong, you can ask to have it corrected

- **Right to Restrict processing** – you can require the Trustees to restrict the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- **Right to object to processing** – as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustees can override this objection in certain circumstances.
- **Withdrawing consent** – 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). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustees to continue processing your personal data where this is justified.
- **Right to be forgotten** – you can request that your personal data is deleted altogether, although the Trustees can override this request in certain circumstances.

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

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

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above.
- request a hard copy of the notice.
- make a complaint about how we have handled your personal data.

Please send an email to loretta.eccleston@weareigg.com / mcl@weareigg.com or write to us at: The Secretary to the Trustees of the MCL Group Pension and Assurance Plan, Independent Governance Group, 4th Floor Cannon Place, 78 Cannon Street, London, EC4N 6HL.

Making a complaint to the Information Commissioner’s Office

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 helpline number is: **0303 123 1113**.

The Trustee has an Internal Dispute Resolution and Data Complaints Procedures and if you would like a copy of this please contact mcl@weareigg.com.

Updates to this notice

This notice is the latest version as at 7 July 2026. This notice will be updated from time to time and you can obtain a current version by contacting us using the “Who to contact” details above.