



Manpower®

PRIVACY NOTICE

For the Manpower Pension Plan (the “Plan”)

This privacy notice is for members and beneficiaries of the Plan. It has been prepared by the current Trustees of the Plan. This notice describes how we collect and use personal data in accordance with UK Data Protection Laws¹.

WHY WE ARE PROVIDING THIS NOTICE TO YOU

As the Trustees of the Plan, we hold certain information about you (“personal data”). In line with the transparency requirements of UK Data Protection Laws, we are required to give you specified information about the personal data we hold about you, how we use it, and the safeguards that are in place to protect it. This notice is designed to give you that information.

WHY WE HOLD YOUR PERSONAL DATA

Personal data, or personal information, means any information about a living individual from which that person can be identified, either on its own or with other information that we may hold. It does not include data where the identity has been removed so that it cannot be linked to any individual (anonymous data).

The Trustees process personal data about you, in our role as controller, for the proper handling of all matters relating to the Plan, including its administration and management, calculating, securing and paying benefits and managing liabilities in relation to it. Further information about how we process this data is provided under the heading “How we will use your data” below.

The legal basis for our use of your personal data will generally be one or more of the following:

- a) We need to process your personal data to satisfy our legal obligations as Trustees of the Plan
- b) We need to process your personal data for the legitimate interests of: administering and managing the Plan and liabilities under it; calculating, securing and paying benefits; and performing our obligations and exercising any rights, duties and discretions the Trustees have in relation to the Plan
- c) The processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract

WHAT PERSONAL DATA WE HOLD AND HOW WE OBTAIN IT

The types of personal data we hold and process about you can include:

- Contact details, including name, address, telephone numbers and email address
- Identifying details, including date of birth, national insurance number and employee and

¹ UK Data Protection Laws means, as applicable:

- (a) UK Data Protection Act 2018;
- (b) the General Data Protection Regulation 2016/679; and
- (c) the EU GDPR as amended and incorporated into UK law under the UK European Union (Withdrawal) Act 2018

membership numbers

- Information that is used to calculate and assess eligibility for benefits, for example length of service and salary information
- Financial information relevant to the calculation or payment of benefits, for example bank account and tax details
- Information about your family, dependents or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death
- Information about your health, for example, to assess eligibility for benefits payable on ill health, or when your health is relevant to a claim for benefits following the death of a member of the Plan
- Information about a criminal conviction if this has resulted in you owing money to your employer and the employer may be entitled to be reimbursed from your benefits.

We obtain some of this personal data directly from you and some from a variety of other sources including public databases, our advisers, and government or regulatory bodies. If you are a member of the Plan, we may also obtain data from your current or past employer(s) or companies that succeeded them in business (for example salary information). If you are or could be a beneficiary of the Plan (as a consequence of another person's membership) we may obtain data from that person or their current or past employer(s) or companies that succeeded them in business.

Where we obtain information concerning certain "special categories" of particularly sensitive data, such as health information, extra protections apply under the data protection legislation. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by that legislation. You have the right to withdraw your consent to the processing of such data at any time by notifying the Trustees in writing. However, if you do not give consent, or subsequently withdraw it, the Trustees may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

Where you have provided us with personal data about other individuals, such as family members, dependents or potential beneficiaries under the Plan, please ensure that those individuals are aware of the information contained within this notice.

HOW WE WILL USE YOUR PERSONAL DATA

We may use this data to deal with all matters relating to the Plan, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- to contact you
- to assess eligibility for, calculate and provide you (and, if you are a member of the Plan, your beneficiaries upon your death) with benefits
- to identify your potential benefit options and, where relevant, implement those options
- to allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements
- to comply with our legal and regulatory obligations as Trustees of the Plan, subject to compliance with applicable data protection laws.
- to respond to queries from you and others that may receive benefits as a consequence of your membership, and to address any actual or potential disputes concerning the Plan
- the management of the Plan's liabilities, including the entering into of insurance arrangements and

selection of Plan investments

- for statistical and financial modelling and reference purposes
- in connection with the sale, merger or corporate reorganizing of the employers that sponsor the Plan and their group companies.

ORGANISATIONS THAT WE MAY SHARE YOUR PERSONAL DATA WITH

From time to time, we will share your personal data with our advisers and service providers so that they can help us carry out our duties, rights and discretions in relation to the Plan. These include the following but not limited to:

- The Plan administrator, currently Hymans Robertson LLP
 - Investment advisers for defined benefit investments, currently Hymans Robertson LLP
 - The Plan actuary, currently Alec Day of Hymans Robertson LLP
 - Actuarial consultants, currently Hymans Robertson LLP
 - For more information on these roles and how Hymans Robertson LLP carry out their duties in relation to personal data can be found on their website: https://www.hymans.co.uk/media/uploads/How_Hymans_Robertson_uses_your_personal_data.pdf
 - The legal advisers to the Trustees, currently Squire Patton Boggs (UK) LLP. Their privacy policy, which sets out how they carry out their duties in relation to personal data can be found on their website: <https://www.squirepattonboggs.com/en>
- The Plan auditors, currently Crowe Clark Whitehill LLP
The Trustees also use legal advisers CMS Cameron McKenna Nabarro Olswang LLP.
<https://cms.law/en/GBR/Footer-Configuration/Legal-Information> contains their privacy policy.
- Additional voluntary contribution providers, currently Prudential
 - Tracing bureaus for mortality screening and locating members and beneficiaries, currently LexisNexis Risk Solutions UK Limited
 - Buy-in insurer, Just
 - DC Funds providers
 - DB Funds providers
 - The Plan's banks
 - The Plan's Life Assurance providers
 - Suppliers of IT, document production and distribution services.
 - Communications services, Likeminds (UK) Ltd

In some instances, advisers and service providers will be controllers in their own right and will be directly responsible to you for their use of your personal data. They may be obliged under the data protection legislation to provide you with additional information regarding the personal data that they hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers directly, for example, via their websites.

We may also provide some of your data to the Plan's sponsoring employers (ManpowerGroup UK Limited, Manpower UK Ltd, Experis Ltd) and group companies of those employers, their advisers and potential purchasers of their businesses.

In addition, where we make Plan investments or seek to provide benefits for Plan members in other ways, such as through the use of insurance or pension scheme mergers, then we may need to share

personal data with providers of investments, insurers and other pension scheme operators. In each case we will only do this to the extent that we consider the information is reasonably required for these purposes.

The advisers, service providers and organisations referred to in the paragraphs above may use personal data to perform their functions as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties (for example, insurers may pass personal data to other insurance companies for the purpose of obtaining reinsurance), to the extent they consider the information is reasonably required for a legitimate purpose.

Where requested or if we consider that it is reasonably required, we may also provide your personal data to government bodies and dispute resolution and law enforcement organisations, including the courts, the Pensions Regulator, the Pensions Ombudsman, the Pension Protection Fund and Her Majesty's Revenue and Customs (HMRC) subject to compliance with applicable data protection laws. They may then use the data to carry out their legal functions.

TRANSFERRING INFORMATION OUTSIDE THE UK OR EUROPEAN ECONOMIC AREA

In some cases, recipients of your personal data may be outside the UK or **European Economic Area** ("EEA") to a jurisdiction that may not offer an equivalent level of protection as is required by EEA countries.

In order to safeguard your data, whenever we transfer your personal data out of the UK/EEA, we ensure a similar degree of protection is afforded to it by implementing one of the following safeguards:

- Where there is an adequacy decision by the Information Commissioner's Office ("ICO") or European Commission in respect of that country, this means that the country to which data is transferred is deemed to provide an adequate level of protection for any personal information held.
- Where there is not an adequacy decision by the ICO or European Commission in respect of that country, we may use specific contracts, including the Model Clauses, which approved for use in the UK which give personal data the same protection it has in the UK.
- In specific circumstances, we may rely on a legal exception to transfer your personal data.

Please contact the Trustees, using the contact details below, if you want information about the safeguards that are currently in place or the specific mechanism used by us when transferring your personal data out of the UK.

HOW LONG WE KEEP YOUR PERSONAL DATA

We will only keep your personal data for as long as we need to in order to fulfil the purposes identified above. In practice this means that we will retain your data for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Plan and for so long afterwards as may be required to deal with any questions, complaints or claims that we may receive about our administration of the Plan. We may also retain your data for a longer period to comply with our legal and regulatory obligations.

YOUR RIGHTS

You have a right to access and obtain a copy of the personal data that the Trustees hold about you and to ask the Trustees to correct your personal data if there are any errors or it is out of date. In some circumstances you may also have a right to ask the Trustees to restrict the processing of your personal data, to object to processing or to transfer or erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline (0303 123 1113).

If you wish to exercise any of these rights or have any queries or concerns regarding the processing of your personal data, please contact the Plan administrators, Hymans Robertson, by email to: manpower.queries@hymans.co.uk or by using the post or telephone contact details provided below. You also have the right to lodge a complaint in relation to this privacy notice or the Trustees' processing activities with the Information Commissioner's Office, you can do this via the ICO's website or telephone helpline.

The personal data we hold about you is used to administer your Plan benefits and we may from time to time ask for further information from you for this purpose. If you do not provide such information or ask that the personal data we already hold is deleted or restricted, this may affect the payment of benefits from the Plan. In some cases, it could mean the Trustees are unable to put your pension into payment or have to stop your pension (if already in payment).

UPDATES

This notice is valid from 2 December 2024. We may update this notice periodically. Where we do this, we will inform you of material changes and the date on which the changes take effect.

CONTACTING US

Please contact the Trustees for further information using the contact details below:



The Manpower Pension Plan Administrators, Hymans Robertson LLP, One London Wall, London, EC2Y 5EA



020 7082 6465



manpower.queries@hymans.co.uk