## Appendix 1

## PRIVACY NOTICE – GKN GROUP PENSION SCHEME (No.1)

**This notice explains to you what information the Trustee will collect and hold about you and what the Trustee will do with it. It also explains your rights and who to contact if you have any questions about this notice.**

### 1. Who is the data controller?

The Trustee of the GKN Group Pension Scheme (No.1) (the "Scheme") is the controller of your personal data for the purposes of the data protection laws. The current data protection laws are set out in the UK General Data Protection Regulation (the UK GDPR) and Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025. We refer to the current protection laws as the "Data Protection Laws" in this privacy notice.

### 2. What personal data does the Trustee collect and how?

You provide the Trustee with information that the Trustee needs as the provider of pension benefits to you, to comply with legal and regulatory obligations and to liaise with regulatory or governmental authorities, for example, the Department for Work and Pensions. This type of information will also be provided to the Trustee by the GKN company that employs you or was your former employer.

Health information may be obtained from your employing company and medical practitioners, and passed to a medical adviser to the Scheme in cases of ill health retirement. In such a case, the Trustee will seek your consent to the collection and use of health information so that a full consideration of your case for ill health retirement may be undertaken.

The Trustee may also receive information from a previous employer (not part of the GKN Group) or your nominated financial advisors in relation to a transfer of benefits from or to other pension schemes, or from regulatory or governmental authorities in relation to tax, state benefits or pensions.

### 3. What will the Trustee do with your personal data?

The Trustee collects and maintains personal data relating to members and pensioners of the Scheme for the purpose of:

- maintaining contact with you
- administering the Scheme
- providing pension benefits under the Scheme
- enabling transfers in and out of the Scheme at your request
- dealing with any queries or disputes in relation to the Scheme and pension benefits

In addition, The Trustee collects and maintains personal data relating to members and pensioners of the Scheme for the purpose of:

- statistical, financial modelling and reference purposes
- risk management, including the insurance of longevity risks and related demographic risks
- 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 authorities or in connection with any disputes or litigation

- dealing with any sale, merger, acquisition, disposal, reorganisation or similar change of your employer's business
- complying with the Trustee's duties in relation to pensions dashboards.

In relation to personal data which is not classed as either 'sensitive personal data' or 'special categories of personal data' under the Data Protection Laws, we will generally either rely on the basis that we have a legal obligation under the Scheme rules and legislation to process your personal data, or on a condition known as "legitimate interests" in order to process your personal data for the purposes specified above. It is in our legitimate interests to collect and process your personal data as it provides us with the information that we need to administer the Scheme, including providing you with the correct benefits, at the right time. We may also rely on a contractual need to process your personal data, in relation to information flowing to and from GKN, as required for employment purposes.

We will always ensure that we keep the amount of data collected and the extent of any processing to the absolute minimum to meet this legitimate interest.

In relation to 'sensitive personal data' or 'special categories of personal data' under the Data Protection Laws (e.g. information about your health), we will only process such data where you have explicitly consented (which may be withdrawn by you on written notice) or where there is an alternative legal basis for processing this information under the Data Protection Laws.

The Trustee has no intention to process your personal data for any purpose that is not described above. The Trustee will inform you if the Trustee wishes to use your personal data for any other purpose.

## 4. What are the Trustee's obligations to collect and your obligations to provide personal data?

The Trustee has a statutory obligation to collect and process certain information about you, for example, in relation to tax matters.

You are required to provide certain information in order to obtain benefits from the Scheme. If you do not provide the Trustee with information the Trustee requests from you, your and your dependent's benefits under the Scheme may be affected.

## 5. Will the Trustee share your personal data with someone else?

Your personal data may be shared with other companies in the GKN Group, for example, if you are an employee member of the Scheme and you take on a secondment or assignment with another GKN company. Your personal data may also be transferred to professional advisors or other third parties who are used by the Trustee to provide services in relation to the Scheme, to providers of benefits under the Scheme, to your nominated financial advisors and alternative pension providers or potential future employers at your or your nominated financial advisor's request, or where the Trustee has legal obligations, such as to regulators, the ombudsman or governmental authorities. It may also be shared with third parties in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in your employer's business. We may also share your information with a qualifying pensions dashboards provider or the Money and Pensions Service to ensure your information is available to be viewed via a dashboard service, and a third party integrated service provider (which facilities the Scheme's connection to the pensions dashboard ecosystem) to enable us to comply with our pension dashboards duties.

## 6. Where will your personal data be stored?

The data that we collect from you will be stored inside the UK on an electronic database.

However, if you live or work outside of the UK, we may need to transfer your personal data outside of the UK 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 where the Scheme's service providers host or process data outside the UK. These transfers will be governed by the Data Protection Laws. We may transfer data outside the UK to a country which the UK government considers ensures a level of protection that is not materially lower than UK standards. This would include countries within the European Economic Area (EEA). If the transfer is not approved by the UK government, we may only transfer data if appropriate safeguards are in place and we consider that the level of protection provided for data subjects is not materially lower than UK standards. You can contact us if you would like more information about these safeguards.

## 7. For how long will the Trustee process your personal data?

The Trustee will process your personal data for as long as you are a member of the Scheme, whether as an active or deferred member, or you or your beneficiaries receive a pension from the Scheme. As there are many circumstances in which claims, queries or investigations arise many years after an individual ceases to be connected with the Scheme (for example, HMRC investigations, claims for compensation in the case of miss-selling by a financial advisor, or evidence is required to demonstrate that an individual has had a refund of contributions), the Trustee will retain your personal data for an indefinite period after all benefits payable to you and your dependants have ceased, or after you cease to be a member. Where information is no longer needed, it will be securely deleted.

## 8. What rights do you have in relation to your personal data?

You have a number of rights in relation to your personal data. These include the right, subject to exceptions, to:

- access your personal data
- request the rectification or erasure of your personal data
- in certain circumstances, to have your data deleted or removed
- request restrictions on the processing of your personal data
- object to our processing of your personal data
- withdraw your consent to processing health information
- a right of data portability, namely to obtain and reuse your data for your own purposes across different services
- object to direct marketing
- not be subject to automated decision making (including profiling) where it produces a legal effect or a similarly significant effect on you
- claim compensation for damages caused by a breach of the Data Protection Laws

Please contact Gallagher as Scheme administrator at the address below if you wish to exercise any of these rights. We will respond to any request received from you within one month from the date of the request. The information 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.

In accordance with the current Data Protection Laws, you also have the right to receive a copy of your personal data in a portable format e.g. Microsoft Excel. This right is limited to personal data that you have provided to us and is processed on the basis of your consent or for the purposes of obtaining benefits under the Scheme. This right does not cover personal data that the Trustee processes to comply with the Trustee's legal obligations or for the Trustee's legitimate interests. Please contact Gallagher as Scheme administrator at the address below to request a portable copy of the data that you have provided.

## 9. What if the Trustee has obtained your consent to use your personal data?

As previously noted, the Trustee will obtain your consent for collection and use of health information. You are not obliged to give your consent and you may withdraw your consent at any time by contacting Gallagher as Scheme administrator. However, if you do not give your consent or you withdraw your consent, depending on your specific circumstances, this may impact on the Trustee's ability to treat you as retiring on the grounds of ill health and provide accelerated benefits under the Scheme or give you

benefits that you would not normally be entitled to under the rules of the Scheme.

## 10. How can I submit a complaint?

If you are not happy with the way in which your personal information is held or processed or believe that your data protection rights have been infringed, you have the right to raise a complaint with us.

You can contact us using the contact details set out at the end of this notice.

We aim to resolve complaints as quickly as possible and within a reasonable timeframe, taking into account the nature and complexity of your complaint.

If you are not happy with our response, you can raise a complaint with 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 or via its website at https://ico.org.uk/make-a-complaint/data-protection-complaints/

## 11. What to do if you have any queries?

If you have any questions about the way the Trustee processes your personal data, you should contact the Scheme Secretary using the details below:

GKN Group Pension Scheme (No.1)
C/o of Mercer Limited
The Paragon,
Counterslip,
Bristol, BS1 6BX
GKNSchemeSecretarial@mercer.com

This privacy notice is current as at June 2026. We keep our privacy notice under regular review, and may change it at any time. We will tell you about any significant changes.