Appendix 2: Privacy Notice

PRIVACY NOTICE FOR THE NOBIA UK PENSION SCHEME (the 'Scheme')

Independent Trustee Services Limited t/a Independent Governance Group (an independent professional trustee company) is the professional corporate sole trustee (the **'Trustee'**) of the Scheme (the **'Scheme'**).

Independent Trustee Services is a private company limited by guarantee, registered in England & Wales with company number 02567540.

The UK's data protection legislation includes the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025, the General Data Protection Regulation 2018 as it was incorporated by the UK following on from Brexit ("UK GDPR") and the Privacy and Electronic Communications 2023 which are together referred to as the "data protection laws" and governs how personal information is used by organisations. The Trustee determines the purposes and means of processing personal data held for the purposes of the Scheme ("Scheme Personal Data") and as such is a controller as defined in the data protection laws ("Data Controller") of Scheme Personal Data for data protection purposes, particularly with regard to Scheme members and their beneficiaries. In this Privacy Notice the terms "we", "us" and "our" refer to the Trustee.

We take your privacy seriously, and we are committed to protecting it. This Privacy Notice explains how we will use any personal information that we collect from you or that is provided to us by you or a third party in connection with your membership of the Scheme, and certain rights and options that you have in this respect.

From time to time we may make changes to this Privacy Notice to reflect any changes to the way in which we process your personal information or changing legal requirements.

Information we collect about you

You, and Nobia Holdings UK Limited (the **'Company'**) in its capacity as principal employer of the Scheme, have provided us, and may in future provide us, with information relating to your employment with the Company and your membership of the Scheme.

This information may also be provided to us indirectly through the dashboard system that enables pensions dashboard services to work as per the Pensions Dashboards Regulations 2022 (the "Dashboards Ecosystem"), including the identity service, the pension finder service and the consent and authorisation service.

We hold the following information:

- personal details such as your name, date of birth, email and postal address, national insurance number;
- family details such as whether you are married or in a civil partnership, and details about your children, dependants and other family members;
- employment details such as the pensionable pay you received while in employment, any bonuses you received, and your length of service;
- sensitive personal data, in the course of your employment with the Company and your membership of the Scheme, we may be required to collect and use sensitive personal information relating to you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health,

sexual life and sexual orientation or details of criminal offences, or genetic or biometric data);

- if you have already started receiving your pension we will hold information such as your bank account details and other data necessary for processing payments and fraud prevention; and
- electronic `pension identifiers` for the purposes of the pensions dashboards.

Where we obtain personal data from the Dashboards Ecosystem or during the process of matching members with their Scheme benefits for dashboards purposes, we may retain that data to help demonstrate how and why we concluded that the person is (or is not) a member entitled to receive information about their benefits on dashboards, and to help us administer the Scheme.

How we use your information

We use your information to ensure the effective, efficient and accurate management of the Scheme in accordance with the Scheme Rules and the law. This includes using your information to enable us to calculate and pay the correct pension benefits during your lifetime and on your death. We may use your information to enable us to communicate with you. We may also display your data on the pensions dashboards and use your data to match certain members with their pensions on the pensions dashboards.

The government has established pensions dashboards to allow individuals to securely access their pension information online in one place. By law, we must connect to this system, which requires preparing and matching member data to verify if an individual has a pension with us. If a match is found, relevant pension data will be shared with that individual. If there is only a possible match, further checks will be carried out. This process involves sharing your personal information (including name, date of birth, and address) with the Pensions Dashboards. In connection with the operation of the Pensions Dashboards, member data may also be shared with regulatory bodies like the Money and Pensions Service (MaPs), the Pensions Regulator and the Financial Conduct Authority

In order to use your personal information, we must have a lawful basis for doing so. Mostly, the reason that we have for using your information is to enable us to carry out the role of Trustee of the Scheme (known as 'legitimate interest'). Without using your information, we could not operate the Scheme effectively. In some situations, however, we are required by law to use your information, and in limited circumstances we can only use your information where we have your consent to do so. If your consent is needed, and has not already been obtained, we will not use your information until we have sought and obtained your agreement.

Who we share your information with

We will not sell your personal information and we will not transfer it outside of the UK or EEA without appropriate safeguards in place. We will only share your personal data with selected recipients and only where it is necessary to do so for the purposes mentioned above in relation to how we use your information. As at the date of this Privacy Notice, we share your information with the following persons for the following reasons:

- The Scheme Actuary is an independent data controller with the Trustee when providing certain actuarial and consultancy services. For more information on how the actuary uses your data, you can contact them using the details on Schedule 1.

- The Scheme administrator to enable it to provide administration, pension payroll, consultancy and investment services to the Scheme. Further information can be found in Schedule 1
- The Scheme auditor, to enable it to complete the audit of the Scheme's Annual Report and Accounts. More information can be found at Schedule 1
- The Scheme legal adviser, to provide legal advice to the Scheme. More information can be found at Schedule 1
- MaPS using out integrated service provider (ISP provider), to ensure the Trustee is able to fulfil their responsibilities regarding Pensions Dashboards compliance. More information can be found at Schedule 1.

We may also seek to share your data with insurance companies for the purposes of securing benefits where appropriate, and your data would be shared on an anonymised basis wherever possible. Whenever we share your information with a third party, that party is required to enter into a binding agreement that they will use your information only for the purposes for which it is provided, and that they will not pass it on to any other person.

In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, local or foreign regulators or to judicial or administrative authorities) or where disclosure is both legally permissible and necessary to protect or defend our rights or protect your rights or those of the public.

The government has created a framework for pensions dashboards, designed to help people access information about their pensions online in one place. As part of this, we are required by law to match active, deferred and pension credit members who search on dashboards with their pensions under the Scheme. We must also provide pensions information to the Dashboards Ecosystem so that it can be displayed when a member (or a delegate authorised by the member) asks to see it on a dashboard.

These activities may involve sharing member data with entities within the Dashboards Ecosystem (including the identity service, the pension finder service, the consent and authorisation service), non-commercial dashboards and commercial dashboards and with the integrated service provider we appoint to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboards duties (the "**Integrated Service Provider**").

As part of these dashboards duties, we may also need to report information (which could potentially include personal data) to bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.[1]

Any personal information held by us and any third-party will be treated as confidential. We will not sell your personal information to third parties.

Keeping your information secure

The security of your personal information is important to us. We will take all steps reasonably necessary to ensure that your personal information is kept safe and secure in accordance with data protection laws. We will take appropriate measures to protect your personal information against loss, theft, and unauthorised use.

At present, data is not transferred outside the UK or EEA but if in the future any of the advisers or the Trustee do transfer personal data, appropriate safeguards will be put in place.

With Scheme information now routinely being received, held and transmitted in electronic format, cyber-security is an important issue for the Trustee. We note that phishing, ransomware and other cyber-security incidents affecting UK organisations (including pension schemes) are increasingly common, and that the Pensions Regulator's General Code contains guidance on this topic.

We are aware of the importance of taking appropriate steps to protect personal data against attacks by cyber-criminals. We are also aware that if cyber-incidents affect the systems of our Administrators or any other processor, as Trustee, we face statutory risk, and that we are expected to find out from our Administrators and other processors what cyber- security measures and staff training against phishing attacks (as a type of cyber-security incident of increasing risk) they implement[2].

How long we will keep your information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any pension scheme requirements and, where required for the Scheme to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled. As an example, pension benefits build up and are paid over a long period. We will therefore need to retain your details until at least 6 years after the final benefits are paid in respect of you. If a spouse's or dependant's pension is payable on your death, this may mean that we keep your personal information for some time even after you have died.

We will not keep information longer than it is needed. Once your information is no longer needed, we will take reasonable steps to securely destroy it.

Your rights regarding your information

Under data protection laws you have increased rights in relation to your personal information.

You have the right to access information that we hold about you, and to obtain certain information about how we use your information and who we share it with. In some situations, we may be exempted from providing this information, for example if doing so would reveal personal information about another person.

You have the right to have any errors in the information held about you corrected. If you wish to request a correction, please explain in detail why you believe the personal information we hold is inaccurate or incomplete.

You also have certain additional rights, for example to have your personal information permanently deleted, to request that we stop processing your personal information, and to request that we transfer your personal information to another party. If the reason why we are able to process your personal information is because you have given consent for us to do so, you may withdraw that consent at any time.

If you would like to exercise any of these rights, please contact us using the contact details at the end of this Privacy Notice. Please note that we will need to verify your identity before we can respond to your request.

Complaints

You also have a right to make a complaint about how we use your personal information. Please contact us in the first instance and we will do our best to resolve the matter to your satisfaction.

This does not affect your legal right to complain to the Information Commissioner's Office, which is the UK data protection supervisory authority. 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).

Contact us

If you have any questions, comments or requests regarding this Privacy Notice or use of your personal information, please get in touch with the Scheme administrators:

Address: The Trustees of the Nobia UK Pension Scheme, C/O Capita Pension Solutions Limited, PO Box 555, Stead House, Darlington, DL1 9YT
Email: NobiaUKPensions@capita.com

Telephone: 0333 222 0082

Or the Scheme Secretary, Victoria Baxter at Victoria.Baxter@weareigg.com

Schedule 1 – List of Advisers

Actuary	Marsh Richard McMillen Richard.McMillen@Marsh.com
Administrator	Capita Karen Gore karen.teague@capita.com
Auditor	BDO Hani Uddin Hani.uddin@bdo.co.uk
Legal Advisers	Eversheds Sutherland Craig Looker CraigLooker@eversheds-sutherland.com
Communications adviser	LikeMinds Sophie Lieghio sophiel@likeminds.uk.com
Pensions Dashboard ISP Provider	Capita ISP Gateway Sue Scott susan.scott@capita.com