

ARCADIA GROUP PENSION SCHEME
ARCADIA GROUP SENIOR EXECUTIVES PENSION SCHEME
6TH FLOOR, COLEGRAVE HOUSE, 70 BERNERS STREET, LONDON, W1T 3NL

4 January 2021

Dear Member

ARCADIA GROUP PENSION SCHEME
ARCADIA GROUP SENIOR EXECUTIVES PENSION SCHEME

When we last wrote to you on 11 December 2020, we said we would write to you again once the Schemes formally entered PPF assessment, and we are now able to confirm that this happened and the Schemes entered assessment with effect from 30 November 2020.

We also promised to provide you with more information about the PPF and the compensation it pays. Please, therefore, find attached a detailed Member Announcement which we hope will answer most of your questions but, if not, the contact details for more assistance are set out on the final page of the Announcement (page 6).

We would also encourage you to please read the enclosed booklet, 'What is the Pension Protection Fund? What we do and how we protect pensions' as well as the Member Announcement.

There are also a couple of additional matters we would like to mention, which are set out below.

Target Professional Services (UK) Limited

During the PPF assessment period, the Trustees are required to ensure that the addresses held for all members are up-to-date and accurate. To do this, the Trustees may enlist the help of Target Professional Services (UK) Limited ("Target"). Target is a specialist in providing member-tracing services to pension schemes. In order to verify that the details we hold for you are correct, Target may contact you directly, by either telephone or letter.

If you wish to read more about Target, you can visit their website at: **www.targetprofessional.co.uk**

Data Protection

The PPF assessment process involves passing personal data about members to the PPF to help with its review. Additionally, data is supplied for statutory reasons and, depending on whether the PPF assumes responsibility for the Schemes, data may be needed to pay compensation to members. In order to carry this out, the PPF may need to pass data to appropriate third parties. If you are concerned about this, please contact the Trustees in the usual way. This pack also contains a copy of the Privacy Notice that sets out which parties have access to your personal data during the Schemes' PPF assessment period.

Further queries or concerns

The PPF has a comprehensive website which has a separate section for members of pension schemes and the PPF. The address of this website is: **<https://www.ppf.co.uk/>**

We will continue to keep you regularly updated so that you know what is happening while the Schemes remain in the PPF assessment period.

With good wishes

Alda Andreotti
Chair of the Trustees of the Arcadia Group Pension Scheme and
the Arcadia Group Senior Executives Pension Scheme

MEMBER ANNOUNCEMENT

The date of this Member Announcement is 4 January 2021.

In this Member Announcement, the Arcadia Group Pension Scheme and the Arcadia Group Senior Executives Pension Scheme will be known as the “**Schemes**”.

This Member Announcement covers the following:

- **Section 1** - Pension Protection Fund FAQs
- **Section 2** - Members who were receiving a pension at 30 November 2020
- **Section 3** - Members who were **not** receiving a pension at 30 November 2020
- **Section 4** - Contact details

Please retain all the details in this Member Announcement in a safe place.

Note

This Member Announcement provides a summary of some of the changes to members’ benefit entitlements that will occur now that the Schemes have entered a Pension Protection Fund (“PPF”) assessment period. It is a summary guide only and does not seek to set out all of the implications or provide a definitive statement of what members will receive. The Rules of the Schemes and the law relating to the PPF will govern the benefits or Compensation that you will receive.

SECTION 1 – PENSION PROTECTION FUND FAQs

1.1 What is the PPF?

The PPF was set up in April 2005 to protect you if your employer or former employer becomes insolvent and the Schemes can no longer afford to pay your promised pension. The PPF’s purpose is to provide benefits to members of eligible schemes where the schemes have insufficient assets to provide members with pension benefits at PPF Compensation levels, details of which are set out in Sections 2 and 3 of this Member Announcement.

1.2 What is the PPF Assessment Period?

This is a process that your pension Schemes go through during which specialist advisers, appointed by the Trustee Companies, will carry out a number of important checks to ensure that all the information the Schemes hold is accurate and up to date, so that members are paid the right benefits. The assessment period allows the PPF to establish the ‘funding level’ of the Schemes which is explained below. At the end of the assessment period the PPF can then determine whether or not it is required to take responsibility for the Schemes and for payment of the PPF level of Compensation to members.

1.3 What is Compensation?

Benefits payable by the PPF are generally referred to as Compensation. PPF Compensation is the amount payable to you in place of the pension that you would have received from your Scheme/s.

1.4 What is the PPF Compensation Cap?

The Compensation Cap is a statutory limit that applies to the amount of Compensation the PPF can pay to certain members. The Compensation Cap will apply if you are under Normal Pension Age (NPA) at the assessment date, 30 November 2020.

However, following a Court of the European Union (CJEU) ruling in September 2018, if your Scheme transfers to the PPF at the end of assessment, you should receive at least 50% of the value of the accrued benefits you would have received from your Employer’s Scheme/s.

1.5 What is Normal Pension Age (“NPA”)?

This is the age specified in the rules of your Scheme as the earliest age at which a member may receive his/her pension without reduction and without requiring the consent of the employer or the Trustee Companies, disregarding any special provision for early payment on the grounds of ill health or otherwise.

1.6 Who is responsible for the Schemes during the Assessment Period?

The Schemes each have a Trustee Board (“the Trustees”) which is responsible for running the Schemes. The current Trustee Boards will continue in place for now, supported by professional advisers and with Barnett Waddingham, a specialist PPF administrator, working alongside the in-house Pensions Team.

1.7 How does the PPF determine if it will take responsibility for the Schemes?

During the assessment of the Schemes, their funding level (see 1.9 below) is calculated as at the day before the assessment date. If the funding level is found to be below 100% of the PPF level of benefits, then the PPF will accept responsibility for the Schemes.

1.8 What is the assessment date?

The assessment date is the 30 November 2020, which is the date Arcadia Group Limited became insolvent.

1.9 What is the funding level of a pension scheme?

An actuary is appointed to value the liabilities of the scheme; this is the value of all of the benefits payable to members now and in the future based on PPF benefit levels. This value is then compared to the assets of the scheme, which is all the money invested on behalf of the scheme. The comparison of these is called the ‘funding level’ of the scheme. For example, if the value of the liabilities is £100m and the value of the assets is £80m, then the funding level of the scheme is 80%. As this is below 100%, in this example, the PPF would accept responsibility for the scheme.

SECTION 2 – MEMBERS WHO ARE RECEIVING A PENSION

This section provides information and answers to frequently asked questions for those members who were being paid a pension from the Schemes at the PPF Assessment date of 30 November 2020.

2.1 Will my pension stop being paid?

No. You will continue to receive your pension.

2.2 Will my pension be reduced?

Your pension may be reduced if you were below the Schemes’ Normal Pension Age (NPA) at the assessment date. If you were above the Schemes’ NPA at the assessment date, or if you retired early on ill health grounds or you are receiving a spouse’s or dependant’s pension, your pension is not expected to reduce from its current level. NPA is explained in Section 1.5.

2.3 When will my pension be reduced?

If your pension needs to be reduced, you will receive advance notification of the reduction. As the change needs to be backdated to the assessment date, please be aware that there may need to be a reduction to your PPF Compensation at some point, to take account of any overpayment between the assessment date and the date your pension is actually reduced. You will be notified personally, in advance, of any such changes.

2.4 How will my pension be reduced?

If you are over the Schemes’ NPA at the assessment date or if you retired early due to ill health or you are receiving a spouse’s or dependant’s pension you will be paid 100% of your pension currently in payment. Otherwise, you will be paid 90% of your pension currently in payment.

Additionally, a cap on your pension is applied. This cap is known as the Compensation Cap and is explained in Section 1.4. These conditions apply if you are under NPA at the assessment date.

However, following a Court of the European Union (CJEU) ruling in September 2018, if your Scheme transfers to the PPF at the end of assessment, you should receive at least 50% of the value of the accrued benefits you would have received from your Employer’s Scheme/s.

2.5 I took a pension based on my Additional Voluntary Contributions (AVCs). Will my pension be affected?

The details of any adjustments to your pension will be notified to you but benefits from AVCs which are paid direct from the Schemes' assets along with your main Schemes' pension will generally be subject to the usual PPF Compensation rules.

2.6 Will my pension continue to increase annually?

If part of your pension was earned on or after 6 April 1997, this part will increase each year in line with the statutory basis (currently the Consumer Prices Index) up to a maximum of 2.5%. No other part of your pension will increase¹. This may be less than the increases you currently receive from the Schemes.

Pension increases will be applied at each 1st January which may be different to the current increase date for the Schemes. The first increase will be applied on 1st January 2022. You will be notified prior to each 1st January if your pension will increase and what your new pension will be.

2.7 I took my pension due to early retirement. Will my pension be affected?

As mentioned in section 2.2, this depends on your age at the assessment date. A review of your pension benefits will be undertaken and you will be notified if any adjustment is to be made to your pension.

2.8 I took my pension due to ill-health. Will my pension be affected?

In most cases your pension will not be reduced. A review of your pension benefits will be undertaken and you will be notified if any adjustment is to be made to your pension.

2.9 I am receiving a spouse's or dependant's pension. Will my pension be affected?

No. You will continue to receive your pension and it will not be reduced.

2.10 What benefits are payable on my death?

During the assessment period, lump sum death benefits are no longer payable. Generally, a spouse's or dependant's pension will be payable of 50% of the pension being paid to you at the date of your death. This may be a different basis than you are currently entitled to under the Schemes.

2.11 Will I be paid on the same day of the month?

The PPF pays benefits on the first of each month. If you currently receive your pension on any other day of the month, during the assessment period your pay date will be changed to the first of the month. Before this happens you will be notified as to how this will be dealt with.

2.12 Can I transfer out my benefits to another pension arrangement?

Transfers are not permitted during the assessment period except to comply with a pension sharing order on divorce. Transfers are not permitted following any transfer to the PPF.

¹Subject to the condition outlined in Section 1.4 above.

SECTION 3 – MEMBERS WHO WERE NOT IN RECEIPT OF PENSION PAYMENTS

This section provides information and answers to frequently asked questions for those members who were **not** being paid a pension from the Schemes at the PPF assessment date of 30 November 2020.

3.1 When will I receive my pension?

At the Schemes' Normal Pension Age ("NPA") which is explained in Section 1.5 of this document. From the Assessment Date, Compensation is revalued each year up to your retirement date in line with the Consumer Prices Index. This annual increase will be subject to a cap of 5% for Compensation linked to pensionable service prior to 6 April 2009, and a cap of 2.5% in respect of compensation linked to pensionable service on or after 6 April 2009.

3.2 Will my pension be reduced?

Yes, if you were below your Schemes' NPA as at the Assessment Date. The adjustment to your pension will reflect PPF Compensation levels and will be applied at the time you take your retirement.

3.3 How will my pension be reduced?

The adjustment to your pension will reflect PPF Compensation levels. Generally, this means you will be paid 90% of your pension. Additionally, a cap on your pension is applied. This cap is known as the Compensation Cap. The Compensation Cap is explained in Section 1.4 of this Member Announcement. Additionally if you choose to give up part of your benefits and receive a tax free cash sum when you take your benefits, your PPF Compensation will be reduced.

However, following a Court of the European Union ("CJEU") ruling in September 2018, if your Scheme transfers to the PPF at the end of assessment, you should receive at least 50% of the value of the accrued benefits you would have received from your Employer's Scheme/s.

3.4 When will my pension be reduced?

At the time your pension comes into payment.

3.5 Can I still take a tax free cash sum when I retire?

Yes this option will still be available. If you choose to give up part of your benefits and receive a tax free cash sum when you take your benefits, your PPF Compensation will be reduced.

3.6 I am over age 55. Can I take my PPF Compensation early?

You will be able to take your benefits early. You should contact the Trustees in writing to make your application. Contact details are shown in section 4. If you decide to take your benefits early your pension will be reduced further to reflect the fact that your pension will be paid for a longer period of time.

3.7 Do I have the option to take my PPF Compensation at a later age than my Schemes' NPA?

You may be able to retire at a later age than your Schemes' NPA. If you defer taking your compensation, it will receive an actuarial adjustment to reflect the period it is postponed.

3.8 Will my pension increase annually in payment?

Your pension may increase annually. If part of your pension was earned on or after 6 April 1997, this part will increase each year in line with the statutory basis (currently the Consumer Prices Index) up to a maximum of 2.5%. No other part of your pension will increase².

Pension increases will be applied at each 1st January which may be different to the current increase date for the Schemes. The first increase will be applied on 1st January following the date you take your pension benefits. Please note that your first increase will be applied on a proportionate basis from your retirement date to the following 1st January.

²Subject to the condition outlined in Section 1.4 above.

3.9 I paid Additional Voluntary Contributions (“AVCs”). What happens to these?

You will receive additional PPF Compensation in respect of any non-money purchase AVCS.

3.10 What benefits are payable on my death?

Once the assessment period starts, lump sum death benefits or refunds of contributions are no longer payable. If provided for under the Schemes’ rules generally, a spouse’s or dependant’s pension will be payable of 50% of the PPF benefit you are entitled to at the date of your death. This may be less than or more than the benefit that your Schemes would have paid you.

3.11 Can I transfer out my benefits to another pension arrangement?

Transfers are not permitted during the assessment period except to comply with a pension sharing order on divorce. Transfers are not permitted following any transfer to the PPF.

SECTION 4 – CONTACT DETAILS

TRUSTEES

For any general queries or concerns about the Schemes, you can contact the Trustees at:

The Quorum
6th Floor, Bond Street South
BRISTOL BS1 3AE

Telephone 0117 942 0080

Email: pensions_helpline@arcadiagroup.co.uk

Website: www.arcadiapensions.co.uk

It would also be helpful if you would provide an e-mail address that we can use in future; please do so by emailing your details to the Pensions Helpline e-mail address above.

FOR QUESTIONS RELATED TO THE PPF AND THE COMPENSATION IT PAYS

You should contact:

The Barnett Waddingham support helpline on 0345 646 0061.

Lines are open from Monday to Friday between 9am and 5pm, with voicemail operating outside of these times. Calls to this number are charged at a local rate.

Alternatively, you can email: Arcdiamembers@barnett-waddingham.co.uk.

Arcadia Group Pension Scheme and the Arcadia Group Senior Executives Pension Scheme (“the Schemes”)

Privacy notice for schemes in PPF assessment

There are a number of parties who require access to your personal data during the Schemes’ PPF assessment period. These include the Trustee, the PPF, the Scheme Actuary, the Scheme auditor and the Scheme lawyer. They are each data controllers of your personal data and are collectively referred to in this privacy notice as ‘we’ or ‘us’.

This privacy notice has been issued by the Trustee on behalf of all of these data controllers to provide a clear picture of how personal data is managed within a PPF assessment period.

It describes what personal data we collect about you and other people whose personal data may be provided to us in connection with your Scheme membership.

This privacy notice also describes how we process (i.e. handle) your personal data, the basis upon which we process it, with whom it is shared, how it is stored and certain other important information relating to the protection of your personal data.

Please read this privacy notice carefully as it contains important information.

What personal data do we collect about you and how?

Personal data is collected about you during the Schemes’ PPF assessment period in a number of different ways:

- you may share information with us (for example, when you respond to letters seeking confirmation of your personal data or when you apply for benefits from the Scheme);
- we may collect certain personal data from third parties (for example, your current or former employer, the former trustees of the Scheme or the former Scheme administrators);
- we may also generate certain personal data in the running of the Scheme (for example, information relating to your benefits).

Your personal data is also collected from the following third parties:

- your current or former employer;

- any financial or other adviser or representative acting on your behalf;
- providers of services that allow us to verify the accuracy of your personal data (for example, to trace your current address or to verify your continuing existence); and
- government agencies (for example, HM Revenue and Customs or the National Insurance Contributions Office).

In certain circumstances, we may ask you for information relating to your health; for example, if you are applying for ill health benefits. We will only ask for as much health information as we need. In some circumstances, your doctor may also provide medical information. We will explain to you at the time why we need that information and how we intend to use it. When we need to, we will ask for your consent to use your health information. There are some cases in which we do not need your consent to use your health information; in those cases, we will still explain to you how we intend to use it.

You may also need to provide us with personal data relating to other people (for example, your spouse, civil partner or dependants). When you do so, you will need to check with them that they are happy for you to share their personal data with us and for us to use it in accordance with this privacy notice.

How do we use your personal data?

The Trustees primarily uses your personal data for the purposes of operating the Schemes during the Schemes’ PPF assessment period; for example, to calculate and pay your benefits, to communicate with you and to make decisions about you and your entitlements and to assess whether the PPF will take on the Schemes.

The Trustees will also use your personal data for the purposes of complying with any laws, procedures and regulations which apply to them and to establish, exercise or defend their legal rights. This will include transferring your personal data at the end of the Schemes’ PPF assessment period to either the PPF or an insurance company if the PPF is not required to take on the Schemes.

The PPF may use your personal data for the purpose of assessing whether the Schemes are eligible to transfer to the PPF, to make sure that you receive the correct PPF compensation if the Schemes do transfer to the PPF at the end of the assessment period and for other purposes connected with its functions. Further details about how the PPF may use your personal data are set out in the Appendix to this notice.

The Scheme Actuary, the Scheme auditor and the Scheme lawyer may use your personal data for the purpose of advising the Trustees on the management of the Schemes during the PPF assessment period.

The Trustees and the Scheme Actuary may occasionally use your personal data for the purposes of statistical analysis or to respond to government surveys (for example, compulsory questionnaires sent to us by the Pensions Regulator or the Office of National Statistics) but this is usually completed on an anonymous basis.

If we wish to use your personal data for any other purpose, we will update this privacy notice.

What is our lawful basis for using your personal data?

Under laws which are designed to protect your personal data, we need to have what is called a lawful basis each time we use, share or otherwise process your personal data.

The Trustees have certain legal duties and powers which are conferred on them by overriding law or by the Schemes' governing documents. In most cases, the Trustees' processing of your personal data is necessary for the performance of those duties and exercise of those powers.

Certain uses of your personal data, or other processing activities, will not be strictly necessary to perform the Trustees' legal duties, or to exercise their powers; however, they will be necessary for the purposes of their legitimate interests or the legitimate interests of a third party. They may also be in your interests.

When we say "legitimate interests", we mean the Trustees' (or a third party's) interests in operating the Schemes as efficiently and securely as possible.

For example, we may choose to use a third party to store your personal data; we may do this in part because our use of that service means that your personal data is more secure.

The processing of your personal data is necessary for the PPF to assess whether the Scheme is eligible to transfer to the PPF and whether you are eligible to be paid PPF compensation. These are tasks which the PPF carries out in accordance with its legal obligations under the Pensions Act 2004 and which are in the public interest.

The Scheme Actuary, the Scheme auditor and Scheme lawyer may use your personal data to advise the Trustees on the management of the Scheme during the PPF assessment period. This advice helps to ensure the Trustees are able to meet their obligations referred to above and is necessary to comply with obligations placed on the Scheme Actuary, Scheme auditor and Scheme lawyer by legislation, including the Pensions Act 2004.

In certain circumstances, we will need your consent to collect and use your personal data; this is most likely where we are collecting information relating to your health (for example, in applying for ill health benefits) or where we obtain information that may reveal your racial or ethnic origin, religious or similar beliefs, sex life or sexual orientation for the payment of death benefits (for example, an expression of wishes form or an application for pension sharing on divorce or dissolution of civil partnership). If we have asked for your consent, you may withdraw your consent at any time.

In what circumstances do we share your personal data?

Your personal data will be shared with one or more of the following categories of third parties:

- your current or former employer - for the purposes of operating the Scheme;
- the Scheme administrator – the Trustees and the PPF delegate some of their duties to the Scheme administrator; they are effectively responsible for the day-to-day running of the Scheme;
- the Scheme Actuary – this is an actuary who is personally appointed to the Schemes to provide advice on the funding of the Scheme. The actuary will be supported by an actuarial team who will also have access to your personal data; our insurers (if relevant) – they provide insurance cover for the payment of death benefits and/or provide annuity policies securing the Scheme benefits;

- our investment managers and AVC providers – they invest the Scheme assets on our behalf;
- the Scheme auditor – they audit the Schemes’ accounts;
- the Scheme lawyer – they advise us on all legal issues affecting the Schemes;
- our payroll agents (if relevant) – they arrange payment of pensions;
- our indemnity insurers;
- any staff we employ and other companies that provide services to us (or to the Scheme administrators), such as communications consultants, printers, suppliers of data cleansing, verification and tracing services and information technology systems suppliers and support, including providers of data storage, email archiving, back-up and disaster recovery and cyber security services;
- government agencies in connection with contracted-out benefits (for example, HM Revenue and Customs and the National Insurance Contributions Office);
- the PPF – for it to assess whether the Schemes are eligible for transfer to the PPF and, if it is, to ensure that members and beneficiaries receive the correct PPF compensation once the Schemes have transferred to the PPF; and
- insurance companies or providers of alternative pension arrangements (if the PPF is not required to take on the Scheme) – for them to assess whether they can provide benefits for you.

Details of all of the main advisers to the Schemes are available in the Schemes’ annual reports and accounts which are available on request by writing to us.

Some of these third parties process your personal data in countries which are outside of the European Economic Area (EEA).

Your personal data will also be disclosed to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or any lawful request from any legal or regulatory authority; or
- to respond to any claims, and to establish, exercise or defend our legal rights.

Most third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us.

Certain third parties (most notably, the PPF, the Scheme Actuary and other professional advisers) are themselves subject to certain legal or regulatory obligations (including professional codes of practice). They will be responsible for their own processing of personal data to the extent that processing is subject to, or relates to, those obligations.

We will always ensure that any third parties with whom we share your personal data are subject to privacy and security obligations consistent with this privacy notice and applicable laws.

Do we transfer your personal data outside the UK and the EEA?

In certain circumstances, your personal data may be processed outside of the UK and the EEA.

If we (or our service providers) process personal data outside of the UK and the EEA, we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this privacy notice and in accordance with applicable laws.

Further details on the steps we take to protect your personal data in these cases are available on request by writing to us.

How long do we retain your personal data?

We keep your personal data for no longer than is necessary for the purposes set out above.

The Trustees are required by the PPF to keep (or ask the Scheme administrators to keep on our behalf) your personal data for a period of two years from the date that the Schemes have either transferred to the PPF or, to an insurance company or providers of alternative pension arrangements, if the PPF is not required to take on the Schemes.

What are your rights in relation to your personal data?

You have certain rights in relation to your personal data; those rights will not necessarily apply in all cases or to all personal data which is processed by us. For example, certain rights will not apply where we need to process personal data to comply with our legal duties.

You have the right to request that we:

- provide you with a copy of any personal data which we hold about you;
- update any of your personal data which is out of date or incorrect;
- delete any personal data which we hold about you, although in these circumstances it would be difficult to provide you with continued Scheme membership;
- restrict the way that we process your personal data;
- consider any valid objections which you have to our use of your personal data; or
- provide your personal data to a third party provider of services.

We will consider all such requests (including whether they apply in a particular case) and provide our response within 30 days of receipt of your request, unless the request is particularly complex or numerous. In this case we would let you know that we have received your request and when we expect to respond.

When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity.

How do we keep your personal data secure?

We are committed to protecting your personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction. We take all reasonable precautions to safeguard the confidentiality of personal data.

Although we make every effort to protect the personal data which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge that we cannot guarantee the security of personal data transmitted to us over the internet, and that any such transmission is at your own risk.

Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access (and take steps to ensure that any third parties with whom we share your personal data do the same).

Changes to this privacy notice

We may amend this privacy notice from time to time. Any changes we make to our privacy notice in the future will be notified to you in the next communication from us to you.

Further questions or making a complaint

If you have any queries or complaints about how we handle your personal data, or if you wish to exercise any of your rights in relation to your personal data, please write to the Trustees or the PPF in the first instance using the contact details set out below.

We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data.

If you are not satisfied with our response, you may also make a complaint to the UK Information Commissioner's Office (<https://ico.org.uk/>), the UK's data protection regulator.

Personal data we process

We may collect and use the following types of personal data about you and, in some circumstances, your spouse, civil partner, partner or dependants:

- name(s);
- national insurance number;
- gender and date of birth;
- home address, telephone number and personal e-mail address;
- marital status, next of kin and family / dependants;
- dates on which you joined and left pensionable service;
- your salary information;
- information relating to your health (for example, if you request ill health benefits);
- information relating to any pension sharing or earmarking order (if your marriage or civil partnership ends);
- information about pension benefits you have accrued, investment choices and death benefit nomination forms;
- tax information including your income tax band and any protections that you may have in relation to your pension benefits;
- your bank account details.

Defined terms

In this privacy notice, the following terms have the following meanings:

Data controllers, us, we or our means collectively the Trustees, the PPF, the Scheme Actuary, the Scheme auditor and the Scheme lawyer as co-controllers of the personal data relating to the Scheme;

PPF means the Board of the Pension Protection Fund;

Schemes means the Arcadia Group Pension Scheme and the Arcadia Group Senior Executives Pension Scheme;

Scheme Actuary means Ben Pullen, Barnett Waddingham LLP;

Scheme auditor means PricewaterhouseCoopers LLP

Scheme lawyer means Travers Smith LLP and Gowling WLG (UK) LLP

Trustees means the Trustee of the Schemes, being Arcadia Group Pension Trust Limited and AG Senior Executives Pension Trustee Limited.

Contacting the Trustees

You may contact the Trustees regarding your personal data either by email or by post using the contact details set out below:

Write to them at:

The Quorum
6th Floor, Bond Street South
BRISTOL BS1 3AE

Please include the Scheme name as a reference in any correspondence with the Trustees.

This privacy notice was last reviewed and updated on 16 December 2020.

APPENDIX – PPF USE OF PERSONAL DATA

The PPF recognises the importance of the correct and lawful processing of personal data in maintaining confidence in their operations. The PPF fully endorse and adhere to the principles set out in the data protection legislation.

What information is shared with the PPF?

The Trustees may share personal data with the PPF, including name, address, telephone number, date of birth, national insurance number, bank details, as well as pension and compensation entitlement, so that the PPF can perform their functions.

How does the PPF process your personal data?

The PPF may process the personal data of members of schemes in assessment for one or more of the following purposes:

- assessing whether your Schemes are eligible to transfer to the PPF;
- ensuring that you receive the correct PPF compensation if the Schemes transfers to the PPF at the end of the assessment period;
- gathering feedback or to ask you to share your views of the PPF;
- updating and informing you of their activities; and
- quality assurance.

The legal basis that the PPF rely on for processing your data will depend upon the circumstances in which it is being collected and used. Most cases fall into one of the following categories:

- the processing is necessary in order for the PPF to comply with a legal obligation; or
- in limited circumstances, you have provided your consent to allow the PPF to use your data in a certain way.

The PPF will not rent, swap or sell your personal data to any other organisation.

The PPF will disclose your personal data (which may include sensitive personal data) when required to by law. For example, to HM Revenue and Customs for tax purposes or to the police for the prevention or detection of crime. Regulators may also require the PPF to share information.

Data research

On occasion, the PPF, or an authorised third party, may contact you for research purposes so that the PPF can improve their services and better meet the needs of members of schemes in assessment.

How long will the PPF keep your data?

The PPF retain your information to comply with legal obligations, resolve disputes and provide services. The PPF will only retain your information if a business need or legal requirement exists. It is not kept longer than is necessary for that purpose.

Contacting the PPF

The PPF has a Data Protection Officer, who is responsible for personal data at the PPF.

Should you wish to contact the PPF to exercise any of your rights in relation to personal data held by the PPF, they can be contacted by writing to them at: Pension Protection Fund, PO Box 254, Wymondham, NR18 8DN