

Privacy notice for the Arcadia Group Pension Scheme

Introduction

Please read this privacy notice carefully as it contains important information about the parties who require access your personal data, what personal data (information) is held about you, how and why it is collected, stored and used, how it may be shared and your rights in relation to your personal information.

Arcadia Group Pension Trust Limited, as Trustee of the Arcadia Group Pension Scheme, collects and uses certain personal information about you. The Trustee is subject to the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018. It is responsible as 'controller' of that personal information for the purposes of those laws. As controller, it must provide you with the information contained in this privacy notice. Arcadia Group Pension Trust Limited (company number 00346324) has its registered office at 46 New Broad Street, London, England, EC2M 1JH.

Personal data collected

Personal data is any information relating to an identified or identifiable individual.

The Trustee, and its service providers, hold personal data for the purposes of operating the Scheme. This includes:

- personal details such as name, date of birth, gender, contact details (i.e. address, home and mobile phone numbers, email address) and national insurance number;
- employment details such as employment history (including any breaks in service or where service has been transferred in), pensionable service records, salary information, contribution records;
- details about family and personal circumstances, such as marital status, details of spouse/civil partner, dependants, other family members and death benefit nominated beneficiaries;
- financial details such as bank account and tax information; and
- online information such as cookies and IP address (a computer's internet address) if you use our website <https://arcadiapensions.co.uk/> or the online member portal provided by Barnett Waddingham;

They may also hold 'special categories' of personal data (i.e. sensitive information which comes with additional safeguards under data protection legislation). This may include information about your health, including any medical conditions (for example, if you apply for ill-health early retirement).

How the information is collected

They may collect this information in a number of ways, including from:

- you (for example when you fill in a pension form, when you contact the Scheme with a query or complaint);
- your employer;
- another pension arrangement (if you have transferred benefits into the Scheme);
- an existing member of the Scheme (if they choose to nominate you for the death benefits that may be due on their death);
- persons acting on your behalf;
- service providers who help us trace members with whom we have lost contact
- government agencies, for example HM Revenue & Customs or the National Insurance Contributions Office

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How they use your personal information

They will typically use this information for the following purposes:

- to contact you;
- to respond to individual queries, complaints and disputes;
- to calculate, provide and assess eligibility for Scheme benefits;
- to comply with obligations arising from administering the Scheme;
- to determine and implement alternative ways of providing Scheme benefits (e.g. by way of a lump sum and/or pension, transfer to another scheme, the purchase of an insurance policy, a merger with another pension scheme);
- to determine and manage Scheme investments and risks
- to determine and manage Scheme liabilities and funding requirements;
- in connection with any corporate activity that the Employers or their representatives may be engaged in.

Reasons for collecting and using your personal information

The lawful basis on which your personal data is collected and used will usually be one or more of the following:

- to comply with a legal obligation (e.g. obligations to administer the Scheme so that you can receive the benefits you are entitled to and make transfers to other schemes);
- for the performance of a contract with you, or to take steps to enter into a contract;
- for the purposes of running the Scheme properly, but only if the legitimate interests of all relevant parties are not overridden by your interests, rights or freedoms.

Where 'special categories' of personal data are held, it will be explained to you at the time why it is needed and how the information will be used. Special categories of personal data will only be processed where it is necessary to do so to establish a right to a benefit. In any other circumstances where it is required to process special categories of personal data, your prior consent will be sought.

Where processing is being carried out on the basis of your consent, you have the right to withdraw that consent at any time by contacting the Trustees using the details provided. Any withdrawal of consent will not impact on the lawfulness of the processing which took place prior to the withdrawal.

The Trustee will seek to ensure that the information collection and processing is always proportionate. It will notify you of any material changes to the information collected or to the purposes for which it is collected and processed.

When your personal data might be shared and with whom

Your personal data, including your name, date of birth and address details, might be shared with the Scheme administrators, actuaries, auditors, lawyers, AVC providers, insurance companies, bankers, investment managers, and any other advisors or service providers appointed to provide services on behalf of the Schemes. This data sharing enables the Trustee to continue to administer the Scheme in a compliant manner and to ensure trustee duties are discharged lawfully.

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Personal information will be shared with law enforcement or other authorities if required by applicable law, for example with the Pension Protection Fund, the Pensions Regulator and the Pensions Ombudsman.

The Trustee may share personal information with a Scheme Employer or their representatives. It will not share your personal information with any other third party.

Third-party service providers such as the Scheme administrator are required to protect your personal information in line with our policies and they are only permitted to process your personal data for specified purposes.

Transfer of your information out of the UK

In certain circumstances, your personal data may be processed outside of the UK and European Economic Area (EEA).

If the Trustee (or service providers) processes personal data outside of the UK and EEA, appropriate measures will be taken to ensure that your personal data is adequately protected in a manner which is consistent with this privacy notice and in accordance with safeguards required by applicable laws.

How long is your personal data kept

Your personal data will be kept for no longer than is necessary to fulfil the Trustee's legal obligations in relation to the Scheme. Given the long-term nature of a pension scheme, this inevitably means that your personal data will be kept for a long period of time, including after you have ceased to be entitled to Scheme benefits (to deal with any queries or complaints which may arise in relation to the administration of the scheme or in the event of a legal claim to show that we have administered the trust correctly). Personal data will typically be held until after the Scheme has wound-up.

Your rights

Under the UK GDPR, you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how the Trustee uses your personal information;
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- require the Trustee to correct any mistakes in your information held;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to the Trustee, in a structured, commonly used and machine-readable format and have the right to transmit that data to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to the continued processing of your personal information; and
- otherwise restrict the processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the Information Commissioner Office guidance at:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

If you would like to exercise any of those rights, please:

- email, call or write to the Trustee, and
- confirm the information to which your request relates, including any account or reference numbers, if you have them.

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Keeping your personal information secure

There are appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way.

There are also procedures in place to deal with any suspected data security breach. You, and the applicable regulator, will be notified of a suspected data security breach when legally required to do so.

How to complain

If you have any queries or complaints about how we handle your personal data, please write to the Trustee using the contact details set out below.

You also have the right to make a complaint to us where you believe we have not acted in accordance with your rights under the UK GDPR. We will acknowledge all complaints within 30 days and will provide a response as soon as possible thereafter.

The UK GDPR also gives you the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was last updated on 22 July 2026.

This privacy notice may be updated from time to time. When it is updated, you will be informed. Please contact the Scheme administrator if your contact details change.

How to contact the Trustee

Please contact the Trustee if you have any questions about this privacy notice or the information held about you, including any requests to exercise your legal rights.

If you wish to contact the Trustee, please send an email to arcadia@dalriadatrustees.co.uk, write to the Trustee c/o Dalriada Trustees Ltd, Linen Loft, 27-37 Adelaide Street, Belfast, BT2 8FE, or call 028 9041 2018.

How to contact the Scheme administrator

Please contact the Scheme administrator, Barnett Waddingham, if you need to update any of your personal details:

Email: arcadiamembers@barnett-waddingham.co.uk

Telephone: 0345 646 0061 (local rates apply), +44 117 313 7234 (from overseas)