Privacy Notice
BT Rolatruc Limited Staff Life Assurance and Pension Scheme (the "Scheme")

The Trustees are responsible for the governance and administration of the Scheme. For the purposes of applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025 (together, the “data protection laws”), the Trustees are the data controller in relation to the Scheme and are ultimately responsible for compliance with all data protection laws.

This notice sets out how the Trustees obtain, use and protect any personal data that you provide, or that is otherwise obtained or generated by the Trustees.

This privacy notice explains:

- What information the Trustees may collect about you;
- What the Trustees may use your information for;
- Who the Trustees may share your information with;
- Your rights regarding your personal information which is held by the Trustees; and
- How you can exercise your right to complain around the manner in which the Trustees hold your data.

What do you mean by personal data?

Personal data is data relating to an individual by which he or she can be identified.

What personal data do the Trustees hold?

The Trustees work to ensure that they only hold personal data to the extent that this is required. The Trustees may hold data for members (past & present), beneficiaries or other individuals who act on behalf of members (such as a next of kin). The Trustees need to hold personal data to be able to administer the Scheme and provide the correct benefits to members and their dependants. This information may include some or all of the following:

- Personal details including name, address, date of birth, gender, marital status, details of dependants and national insurance number
- Scheme membership and employment details, including period of service, salary and contributions paid
- Bank details, where your pension is in payment
- On occasion, certain sensitive personal data may need to be held (for example medical records if a member wishes to retire early on the grounds of ill health) - if this is required your consent would be requested

Where does my personal data come from?

In addition to any data that has been provided by you (or your spouse or dependants) directly, the Scheme also potentially receives or has received personal data from your employer, a former employer, HM Revenue & Customs, a tracing agency, your nominated financial adviser, your appointed representative and any previous pension provider with which you had benefits.

Why do the Trustees need my personal data?

The Trustees collect and process your data on the basis of the legal reasons set out below:

1. The Trustees must hold and process personal data about members and other beneficiaries in order to carry out their legal obligations under the Scheme's Rules and legislation, including the following obligations:
    a. To calculate and pay the correct benefits, and deal with any queries about these.
    b. To communicate with you about your benefits and the Scheme.
    c. To pay tax charges, monitor whether allowances are exceeded and report to HM Revenue & Customs.
2. It is also in the Trustees' legitimate interests to be able to use the data to administer the Scheme, for example:
    a. To run mortality and address checks against member records to ensure information is correct and to prevent and detect fraud.
    b. For risk management purposes, including the insurance or management of longevity risks and obtaining quotations for annuities or other insurance products.
    c. To otherwise ensure that the Scheme is correctly managed in line with the Trustees' duty to pay the correct benefits.

When relying on the basis at (2) above, the Trustees will take appropriate steps to ensure the processing does not infringe your rights and freedoms under data protection laws.

Also, as noted above, in certain circumstances the Trustees may also seek your consent before collecting and processing certain sensitive personal data, such as medical records. You have a right to withdraw your consent, but this will not affect any processing which has already occurred (and the Trustees may still need to process your data to some extent, where strictly necessary, to comply with their legal obligations).

How long is my personal data retained for?

The Trustees will keep your personal data, in accordance with the law and regulatory guidance, for as long as is necessary for the purpose(s) for which it was collected, in particular to enable the Trustees to administer the Scheme and pay the correct benefits, and for so long afterwards as the Trustees consider may be required to deal with any questions or complaints that the Trustees may receive about the Trustees' administration of the Scheme. When no longer needed, the Trustees will ensure that personal data is securely destroyed. Retention periods will be kept under review to ensure they remain appropriate in light of legal, regulatory and guidance developments.

Who else is my data shared with?

Your data is held by the Scheme administrators, Aon Solutions UK Limited ('Aon') and by Toyota Material Handling UK Limited, which operates pensioner payroll.

The Trustees will share your personal data as necessary with other advisers and service providers used to help administer the Scheme, for example the Scheme's actuary, legal advisers, investment advisers, auditors and accountants. The Trustees may also share your personal data with organisations such as tracing, archiving, document printing and distribution and IT service providers.

All such advisers and service providers have to ensure that they protect your personal data and only use your personal data in line with principles set out in data protection laws. The Trustees have written agreements in place with their appointed advisers and service providers to ensure their compliance with data protection laws.

The Trustees may pass personal information to other third parties at your request, for example where you are considering a possible transfer and you have asked the Trustees to provide information to your adviser and/or to the administrators of the receiving arrangement. In this situation the Trustees will assume that you have satisfied yourself that the third party has suitable security measures in place.

In some circumstances, the Trustees may also need to pass personal data to other third parties, such as:

- Companies in the Toyota Material Handling group (including your employer)
- Public authorities, regulators and other government bodies, such as HMRC and the Pensions Ombudsman
- Insurance companies, to arrange particular entitlements, such as an annuity policy

Where is my data held?

Your personal data will usually be stored within the UK or the European Economic Area (EEA). However, there may be some circumstances in which it needs to be transferred overseas, for example to an appointed service provider, or if you live or work outside of the UK or EEA, in order to respond to any queries that you may have. Where this applies, all steps reasonably necessary will be taken to ensure that your data is treated securely and in accordance with this notice. If you wish to know more about the safeguards in place, please contact the Scheme Secretary using the contact details below.

Other data controllers

Rebecca McGowan FIA, of Aon, as actuary to the Scheme is also a data controller in relation to the Scheme and Aon itself is a joint data controller with Rebecca McGowan as a provider of actuarial services to the Trustees. The actuary and Aon use your personal data to advise the Trustees on the financial management of the Scheme. This advice helps to ensure that the Trustees can meet their obligations to pay members' benefits, and is necessary for the Trustees to comply with other legal obligations. Aon too therefore needs to provide information about the personal information they have about you and what your rights are in relation to it. Aon's own privacy notice can be accessed through the following link:

https://www.aon.com/en-gb/about/leadership-and-governance/privacy-policy-uk

BESTrustees Limited is a professional trustee of the Scheme and also a data controller and will continue to be so should its appointment as Trustee come to an end. This is so that it can continue to assist with member and beneficiary queries and complaints.

BESTrustees own privacy notice can be accessed through the following link:

https://www.BESTrustees.co.uk/privacy-notice

Alternatively, please contact the Trustees and we will obtain a hard copy of these documents for you.

It is possible that other providers used by the Trustees, such as the legal adviser or auditor, may be data controllers and may, after this document has been issued, also wish us to direct you to their own privacy notice. If this happens we will do this in our next routine communication. However, you can contact us at any time using the address below to confirm the current position.

What are my individual rights in relation to the processing of personal data?

- Right to rectification (to have incorrect or incomplete personal data updated)
- Right of subject access (to determine what personal data is held by or on behalf of the Trustees in relation to you and to receive a copy of that personal data)
- Right to be forgotten (to have your personal data deleted or removed it if is no longer necessary for the purpose of administering the Scheme)
- Right to data portability (to obtain and reuse your data for your own purposes)
- Right to object to the processing of data where the Trustees are relying on their legitimate interests as the legal basis for processing
- Right to lodge a complaint with the Information Commissioner's Office
- Right to make a complaint about an alleged infringement of UK data protection law

Please contact the Scheme Secretary using the details below if you wish to exercise any of these rights.

How can I raise a complaint in relation to my data?

If you believe your personal data has not been handled in accordance with applicable data protection laws, you can raise this under the Scheme's IDRP (Internal Dispute Resolution Procedure), which you can request using the contact details below:

Email: Btrolatruc.pensions@aon.com
Phone: 03405 608 0825
(Lines are open Monday to Friday, 9am to 5pm)
Write to: BT Rolatruc Ltd Staff Life Assurance and Pension Scheme,
Aon Solutions Scanning Division,
PO BOX 196,
HD8 1EG

If you are not satisfied with the outcome, you have the right to complain to the Information Commissioner's Office, which can be contacted on 0303 123 1113 or via other methods of communication as explained on their website (currently https://ico.org.uk).

Who should I contact if I have any queries?

Should you have any queries in relation to this notice or the Trustees' data protection policy, then please contact the Scheme Secretary using the below address:

Marcus Pollitt
Aon Solutions UK Ltd
3 The Embankment
Sovereign Street
Leeds
LSI 4BJ

Updates to this notice

The Trustees may update or amend this privacy notice from time to time to comply with the law or to meet changing business requirements.

This privacy notice was last updated on 16 June 2026.