

## **PRIVACY NOTICE FOR THE LOGAN TELEFLEX (UK) LIMITED PENSION SCHEME**

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

Ross Trustees Services Limited is a private company limited by guarantee, registered in England & Wales with company number 07904277.

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 Daifuku Logan Ltd (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.

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.

## How we use your information

We use your personal information to ensure the effective, efficient and accurate management of the Scheme in accordance with the Scheme rules and the law for the following purposes:

- To fulfil a contract, or take steps linked to a contract, with you or the Company. This includes:
  - to register you as a member of the Scheme;
  - to provide and administer pension service or other services or solutions, as instructed by you or the Company; and
  - to process payments, billing and collection.
- As required by the Scheme to conduct our business and pursue our legitimate interests as the Trustees of the Scheme, in particular:
  - to analyse and improve our services and communications and to monitor compliance with our policies and standards;
  - to manage access to our premises and for security purposes;
  - to protect the security of our communications and other systems and to prevent and detect security threats, frauds or other criminal or malicious activities;
  - for insurance purposes;
  - to exercise or defend our legal rights or to comply with court orders;
  - to provide pension administration and benefits services to our members e.g. to enable us to calculate and pay the correct pension benefits during your lifetime and on your death; and
  - to communicate with you to keep you up-to-date on the latest developments, announcements, and other information about our services and solutions (including briefings, newsletters and other information), events and initiatives; to send you details of surveys, marketing campaigns, market analysis, or other promotional activities; and
  - to collect information about your preferences to personalise and improve the quality of our communications with you.

For purposes required by law, including maintaining records, compliance checks or screening and recording (e.g. anti-money laundering, financial and credit checks, fraud and crime prevention and detection, trade sanctions and embargo laws). This can include automated checks of personal data you provide about your identity against relevant databases and contacting you to confirm your identity, or making records of our communications with you for compliance purposes.

Save as otherwise set out in this Privacy Notice, where personal information is collected as part of our due diligence processes, such personal information will only be used for the purposes of preventing money laundering, terrorist financing or proliferation financing. It will not be used for any other purpose without your consent. We will not use your personal data for taking any automated decisions affecting or creating profiles other than as described above.

If you provide information to us about any person other than yourself, your employees, counterparties, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

### **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 can be found here <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>, or 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.
- The Scheme legal adviser, to provide legal advice to the Scheme.
- Aviva, for the purposes of securing and, if applicable, administering benefits under the buy-in contract between the Trustees and Aviva.

The Trustees have entered into a bulk purchase annuity agreement with Aviva. Aviva's Privacy Notice can be found here: <https://www.aviva.co.uk/services/about-our-business/products-and-services/privacy-policy/retirement-privacy-policy/>

This notice explains the personal information which Aviva holds as part of this agreement in respect of the members and beneficiaries whose benefits have been insured, and how it looks after this personal information. This notice also explains members' and beneficiaries' rights in relation to their personal information.

We may also share your personal information with insurance companies for the purposes of securing benefits where appropriate, and your personal information would be shared on an anonymised data wherever possible. Whenever we share your personal information with a third party, that party is required to enter into a contractual agreement that they will use your personal 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.

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.

### **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](http://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: Corporate Pensions Administration Ltd, Unit 4, Antler Complex, Bruntcliffe Way, Morley, Leeds, LS27 0JG

Telephone: 0113 220 3630

Email: [info@corpad.co.uk](mailto:info@corpad.co.uk)

Or the Scheme Secretary, Sena Erkas at [sena.erkas@weareigg.com](mailto:sena.erkas@weareigg.com)

## Schedule 1 – List of Advisers

Actuary	<p>Aon</p> <p>David Summersgill</p> <p><a href="mailto:david.summersgill@aon.com">david.summersgill@aon.com</a></p>
Administrator	<p>Corpad</p> <p>Samantha Eamonson</p> <p><a href="mailto:sbourne@corpad.co.uk">sbourne@corpad.co.uk</a></p>