

Trustee of the Imperial Tobacco Pension Fund ("Fund"): privacy notice

BACKGROUND

As the trustee of the Fund (the **"Trustee"**, **"we"** or **"us"**), we are subject to the requirements of the UK GDPR and the Data Protection Act 2018. One of those requirements is to give you information about the personal data that we collect about you in the course of running the Fund.

We are a 'data controller' of your personal data. This means we are responsible for keeping your personal data safe and secure. This privacy notice gives you that information – it describes what personal data we may collect about you and other people (e.g. your spouse, civil partner or dependants) in connection with your Fund membership.

This notice also describes how we process (i.e. handle) your personal data, the legal 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 – however, it is for information only and you do not need to take any action.

A. What personal data do we collect about you and how?

We collect personal data from you in a number of different ways:

- you may share information with us (for example, when you joined the Fund);
- we may collect certain personal data from third parties (for example, your current or former employer);
- from public records (for example, the register of births, deaths and marriages);
- we may also generate certain personal data in our running of the Fund (for example, information relating to your contributions and benefits);

If you are a member, we collect certain personal data from third parties. In particular, we collect personal data from the following:

- your current or former employer within the Imperial Brands group;
- any financial or other adviser or representative acting on your behalf, and, if you want to transfer benefits out of the Fund, the trustees or managers of other pension schemes of which you are or have been a member;
- providers of services that allow us to verify the accuracy of your, or your spouse's/dependant's, personal data (e.g. to trace your address or to verify your continuing existence); and
- public databases (for example, the register of births, deaths and marriages), government agencies (e.g. HM Revenue & Customs (**"HMRC"**)) or the National Insurance Contributions Office (NICO))

We may collect and use the types of data set out in section K of this notice.

In certain circumstances, we may ask you for information relating to your health – for example, if you cannot work due to incapacity and you want to take your pension benefits early. This more sensitive information (referred to as "special category data" under UK GDPR) requires higher levels of protection and can only be processed in certain circumstances. Therefore, we will only ask for as much information as we need. 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 or other special category data.

You may also need to provide us with personal data relating to other people (such as your spouse, civil partner or dependants). You should 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 notice.

B. How do we process your personal data?

The main purpose for which we process your personal data is to operate the Fund – for

example, to calculate and pay benefits, to communicate with you (whether by post or email) in relation to the Fund or your Fund membership either directly or via, for example, by our Fund newsletter, and to make decisions about you and your entitlements.

It also includes matters to do with the wider operation and future of the Fund. For example, we use personal data to calculate the Fund's liabilities and the sums that the employer(s) and members need to pay to the Fund. We may also use personal data to set up insurance policies to meet the Fund's liabilities, in connection with options offered to members or benefit design, transferring your benefits to another scheme or arrangement, a scheme merger, or any proposal to make changes to the Fund's benefits.

We will also use your personal data for the purpose of compliance – to comply with any laws, procedures and regulations that apply to us, or to establish, exercise or defend our legal rights, which includes connection with the pensions dashboards.

Finally, we will occasionally use your personal data for the purposes of statistical analysis or to respond to government surveys (for example, questionnaires sent to us by the Pensions Regulator or the Office of National Statistics), but these are always completed on an anonymous basis.

If we wish to use your personal data for any other purpose, we will update this privacy notice to let you know about it.

C. What is our lawful basis or ground for processing your personal data?

Under laws which are designed to protect your personal data, we must have a lawful basis, or ground, for each time we use, share or otherwise process your personal data.

Legal obligations

The main ground on which we process your personal data is to carry out our legal obligations. As the Trustee of the Fund, we have certain duties and powers conferred on us by law or by the Fund's governing documents. In most cases, therefore, our processing of your personal data is necessary to perform those duties and exercise those powers.

Legitimate interests

Some uses of your personal data, or other processing activities, will not be strictly necessary to perform our legal duties, or to exercise our powers; however, they will be necessary to fulfil our legitimate interests, or the legitimate interests of a third party. They may also be in your interests.

By "legitimate interests", we mean our (or a third party's) interests in operating the Fund as efficiently and securely as possible. For example, we may choose to use a third party to store your personal data, because our use of that service means that your personal data is more secure; we may also choose to use third party services to validate the accuracy and completeness of the personal data we hold about you, your spouse, civil partner and your dependants (including to validate your identity, age, marital status and continued existence).

If we are processing personal data in a certain way because it is in our (or a third party's) legitimate interests (rather than necessary for the performance of our legal duties), you have the right to object to this processing.

Consent

In some 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 in relation to an application for an ill-health early retirement pension, or where we obtain information that may reveal your racial or ethnic origin, religious or similar beliefs, or sexual orientation (e.g. an expression of wishes form which indicates that you have a civil partner). If we have asked for your consent to process your personal data, you may withdraw your consent at any time.

You may withdraw your consent, or object to our processing of your personal data in a certain way (where you have the right to do so), by contacting the Imperial Tobacco Pension Fund office (full contact details are set out below).

However, there are some situations where the law allows us to use sensitive information, such as health conditions, without your consent, including where we need to use it to establish, exercise and defend legal claims.

D. When do we share your personal data?

We will regularly share your personal data with the following categories of third parties:

- your current or former employer within the Imperial Brands group, and other companies within the Imperial Brands group and their advisers – for the purposes of operating the Fund, the future operation of the Fund, consideration of pension strategy, or to enable those group companies to comply with their legal and regulatory obligations;
- our administrators – we delegate some of our Trustee duties to administrators; they are responsible for the day-to-day running of the Fund;
- our overseas payment services provider – they assist us in making pension payments to members with overseas bank accounts;
- the Fund's actuary – this is an actuary who is personally appointed to the Fund to provide us with advice on its funding. The actuary will be supported by an actuarial team who will also have access to your personal data;
- our benefit consultants – they provide advice on all aspects of running the Fund, including the level and form of benefits to be provided to members of the Fund, member communication, and strategies for managing the risks associated with the Fund;
- our insurance providers – they provide insurance cover to provide death benefits for certain employee members of the Fund;
- our auditors – they prepare the Fund's annual accounts and audit them for us; and
- our lawyers – they advise us on all legal issues affecting the Fund;
- other companies that provide services to us (or to our administrators), such as printers, suppliers of data cleansing, tracing services, software providers and other IT systems suppliers and support, including providers of data storage, email archiving, back-up and disaster recovery and cyber security services;
- our indemnity insurers (although only in the event of a claim);
- any tax adviser appointed by your employer within the Imperial Brands group to assist with personal tax matters (for example, if you are or were a UK employee based overseas for some or all of your employment);
- any financial adviser you appoint in relation to transferring your benefits to another pension scheme (and the trustees or managers of the pension schemes you transfer or your benefits are transferred to); and
- statutory bodies (for example, the Pension Protection Fund) or government agencies in connection with contracted-out benefits and pension tax charges arising in respect of the Annual Allowance and Lifetime Allowance (such as HMRC).

Details of the main advisers to the Fund are available in its annual report and accounts which are available on request from the Imperial Tobacco Pension Fund office (contact details below).

We will also share your personal data with third parties providing online services that allow us to validate the accuracy and completeness of your personal data. We share certain personal data with those third parties (such as, your name, date of birth and home address); those third parties then use various other datasets that they have available to them (for example, from the full electoral roll and the Royal Mail) to verify your identity, age, marital status and continued existence. These checks will leave what's called a "soft footprint" on your credit record; a soft footprint has no negative effect on your credit rating. We use these services in the day-to-day administration of member benefits, and

Less frequently, we will share your personal data with the following categories of third parties in order to operate the Fund:

for specific matters to do with the wider operation of the Fund.

We will also disclose your personal data 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) to using your personal data for the specific purposes identified by us.

Certain third parties (most notably, the Fund's actuary and other professional advisers) are themselves subject to legal or regulatory obligations (including professional codes of practice), and may also be data controllers in their own right and be subject to obligations accordingly.

Some of these data controllers have their own, separate, privacy notice which applies to their use of your personal data instead of this notice. A full list of these data controllers and copies of their privacy notices are available from us on request by contacting the Imperial Tobacco Pension Fund office (see below).

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.

E. Do we transfer your personal data outside the UK?

In certain circumstances, your personal data may be processed outside of the UK; for example, third party service providers may store certain personal data in a country outside the UK, or access it from outside the UK.

If we (or our service providers) process personal data outside of the UK, 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. Those measures include:

- ensuring that your personal data is processed in countries which have been deemed, by the Secretary of State in the UK, to be adequate (which includes countries within the European Economic Area); or
- ensuring that any such service provider has entered into the standard contractual arrangements approved by the UK for protecting personal data when it is processed in a country which has not yet been deemed adequate.

Where personal data is transferred outside the UK on the basis of the standard contractual clauses, we may also need to undertake a 'transfer impact assessment' to assess whether those clauses are sufficient by themselves, or if we (or our service providers) also need to take additional supplementary measures (for example, by encrypting personal data, or by having a process in place for notifying us of requests to access personal data).

Further details on the steps we take to protect your personal data in these cases are available from us on request by contacting the Imperial Tobacco Pension Fund office (contact details below).

F. How long do we retain your personal data?

We will need to keep most of your personal data for at least as long as you are a member of the Fund (an active, deferred or pensioner member). When you die, we will need to continue to hold your personal data because we may need to pay benefits to your spouse, civil partner or dependants. When your spouse, civil partner or dependants subsequently die, or if you transfer benefits out of the Fund, we will still need to keep your personal data for the purposes of answering any queries, defending any future claims or establishing, exercising or defending our legal rights. In practice, this means that we will normally need to retain data indefinitely. We will review this policy from time to time to ensure that it remains appropriate and advise you of any changes.

G. What are your rights in relation to your personal data?

You have rights in relation to your personal data; those rights will not necessarily apply in all cases or to all personal data which we process. For example, certain rights will not apply where we need to process personal data to comply with our legal duties. If an exception applies, we will tell you this.

You have the right to request that we:

- provide you with a copy of any personal data that we hold about you (right of access);
- update any of your personal data that is out of date or incorrect (right to update your information);
- delete any personal data that we hold about you, although if you request this it will be difficult to provide you with continued membership of the Fund (right to delete your information);
- restrict the way that we process your personal data (right to restrict use of your information);
- consider any valid objections that you have to our use of your personal data (right to object);
- provide your personal data to a third party provider of services (right to data portability).

We will consider all such requests to exercise your rights (including whether they apply in a particular case) and provide our response within the time period stated by applicable law.

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

H. How do we keep your personal data secure?

We are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and 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 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).

I. 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, such as the summary funding statement, benefit statement, member newsletter, or report and accounts.

J. Further questions or making a complaint

If you have any queries or complaints about our collection, use or other processing of your personal data, or if you wish to exercise any of your rights in relation to your personal data, please contact the Imperial Tobacco Pension Fund office (contact details below).

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

You may also make a complaint to the UK's data protection regulator, the UK Information Commissioner's Office (<https://ico.org.uk/>).

K. 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 or dependants:

- name(s);
- sex;
- national insurance number;
- date of birth

- home address and telephone number;
- personal e-mail address;
- marital status and family / dependants (e.g. in relation to benefits payable if you die);
- your current or former employer within the Imperial Brands group;
- the date you joined and left employment and your employment status (e.g. full time or part time);
- dates on which you joined and left pensionable service;
- salary information;
- your normal retirement date;
- your status as a member of the Fund (e.g. active, deferred);
- circumstances of retirement or leaving service;
- information relating to your health (e.g. if you are unable to work due to incapacity and you want to take your benefits early);
- information relating to your contributions to and benefits under the Fund (including any contracted-out benefits);
- information relating to any pension sharing or earmarking order (if your marriage or civil partnership ends);
- tax information including your income tax code and any tax protections that you may have in relation to your pension benefits; and
- your bank account details if you are in receipt of a pension from the Fund or pension benefits have been paid to your bank account in the past.

L. Marketing

We may collect and use your personal data for the purpose of sending you marketing, by post or email.

We may send you certain marketing communications (including electronic marketing communications) if it is in our legitimate interests to do so for marketing and business development purposes.

However, we will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal data to any third party for such marketing.

If you wish to stop receiving marketing communications or change the method by which you hear from us, you can contact us by email using the details set out below.

Defined terms

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

Fund means the Imperial Tobacco Pension Fund;

personal data is any information, in any format, that could be used to identify a living individual;

Trustee, us, we or our means Imperial Tobacco Pension Trustees Limited, the corporate trustee of the Fund; and

UK GDPR means the UK General Data Protection Regulation.

The Trustee may be contacted at:

Imperial Tobacco Pension Trustees Limited,
PO Box 3242,
Winterstoke Road,
Bristol BS3 9GY.

Telephone: 07483 321223
Email: rob.egginton@uk.imptob.com.

This privacy policy was last reviewed and updated in June 2026.