

ROBERT L FLEMING LIMITED RETIREMENT BENEFIT SCHEME (THE "SCHEME")

PRIVACY NOTICE

Mondi Pension Trustee Limited (the "Trustees"), the trustee of the Scheme is committed to protecting and respecting your privacy. This Privacy Notice explains the types of personal information we collect, how we use that information and who we share it with in order to properly manage and administer the Scheme, and also sets out how we protect that information.

Please read the following carefully to understand our practices regarding your personal information. By your continued participation in the Scheme, you are agreeing to the practices described in this Privacy Notice.

Who we are

We, the Trustees, are the 'data controller' for the purposes of the Data Protection legislation. Our address is: c/o Mondipension Trustee Limited, Building 1 First Floor, Aviator Park, Station Road, Addlestone, Surrey, KT15 2PG, 06526371. The Trustees' representative is Lygia Jones, the Scheme secretary, who may be contacted about any data protection questions you have on: 01932 826300.

Information covered by this Privacy Notice

This Privacy Notice covers all personal information collected and used by us. "Personal data" or "personal information" means information that enables you to be identified or recognised, directly or indirectly.

Our legal basis for using your information including how we share it?

Under the data protection law, data can only be processed if the processing is necessary for one or more specified grounds. The main legal basis on which we process your data is that the processing is necessary to comply with our legal obligation to pay your benefits when they become due. We may also need to use your personal information for the purposes of our legitimate interests in administering the Scheme.

What information do we collect from or about you?

The Trustees collect information to administer your benefits under the Scheme which may include some or all of the following:

- Personal details, such as name, date of birth, gender, postal address, email address, phone number, bank details to process pension payments, national insurance number and HMRC details;
- Family and dependant details, current marriage and partnerships and marital history;
- Scheme membership details such as member identification number, pensionable pay, length of service, employment and career history.

Information we receive from other sources:

We may receive information about you from third parties; for example, your current, former or prospective employer or from anyone entitled to benefit under your membership of the Scheme. We might also collect information from your next of kin or (with your consent) from registered medical practitioners.

Sensitive Personal Information

Some of the personal information you provide may be sensitive personal information, such as details about your health in the case of ill-health early retirement. In these circumstances, you will be asked to complete a consent form. This will enable the Trustees to process your sensitive personal information for the purposes set out in the consent form.

Third Party Personal Data

If you provide us with personal data relating to another person, such as your partner, spouse, civil partner or dependants, you should ensure that the individual is aware that you are sharing their personal data with us. You should also share this Privacy Notice with them and ensure that they are aware that they can request another copy of the Privacy Notice via the contact details above.

Who may use your personal information?

We may share your personal information with third parties where it is necessary to administer the Scheme and/or comply with contractual obligations relating to it.

We typically share your personal information with the following organisations:

1. The Scheme's administrator

We have appointed Aon Solutions UK Limited as administrator for the Scheme ("**Aon**"). Aon carries out the pensions administration services on behalf of the Trustee and will require access to your personal information in order to calculate and pay benefits under the Scheme. It will also perform other activities, such as responding to requests or complaints and providing information to members, and so will require access to your contact details. As administrator Aon will process your personal information on our behalf as our data processor.

2. Mondi Aberdeen Limited as the principal employer of the Scheme and members of our group of companies

Your personal information will only be shared with these entities to the extent that this is necessary for the administration of your pension benefits.

3. Other third party service providers

We may also share your personal information with our other service providers who help us administer the Scheme, such as the Scheme actuaries, auditors, investment consultants, legal advisers and insurers. They may process your personal information as data controllers or on our behalf as data processors. We ensure that your information is kept secure by checking that their security measures are adequate and, where they are data processors, by entering into agreements with such third parties which specify that they must only process personal information on our behalf and according to our instructions.

In particular Aon are also appointed as actuaries and consultants to the Trustees and in this capacity Aon, and the appointed Scheme Actuary, act as a data controller. More detail about Aon's use of your personal information is set out in their full Privacy Notice. We recommend that you review this notice which is available online at www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp, or you can request a copy by contacting Aon, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH

4. Third parties permitted by law

- (a) 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).
- (b) We may also disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend your rights or those of the public or of us, the Trustees.

5. Third parties connected with business transfers

- (a) We may transfer your personal information to third parties in connection with a reorganisation, restructuring, merger, acquisition, sale or transfer of assets, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Notice.
- (b) 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.

Personal information stored overseas

The personal information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") (for example, in the USA). It may also be processed by staff operating outside the EEA who work for us or for one of our service providers. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice and applicable data protection laws, including, where relevant, entering into EU standard contractual clauses (or equivalent measures) with the party outside the EEA receiving the personal information.

Your rights

You have rights in relation to the personal information we hold about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can obtain more information about these rights by contacting us using the details below.

Contacting us

If you have any questions or concerns about how we treat your personal information, any questions about your rights in relation to the information we hold, or you would like to request a copy of the personal information we hold about you, please contact us at rlfleming@aonhewitt.com or by writing to us at:

Robert L Fleming Limited Retirement Benefit Scheme
Aon Scanning Division
PO Box 196
Huddersfield
HD8 1EG

Please include your reply address when you write to us.

Making a complaint

We would be happy to address any concerns you have directly and as a first port of call. Should you have a need to escalate your complaint, you have the right to lodge a complaint with the UK data protection authority:

Information Commissioner's Office
Wycliffe House
Water Lane, Wilmslow
Cheshire, SK9 5AF

Tel. +44 1625 545 745

e-mail: international.team@ico.org.uk

Website: <https://ico.org.uk>

How long do we keep your personal information?

Your personal information is stored by us and/or our service providers, strictly to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws. In the context of providing pension benefits, this period can be extensive, and may continue for a period after you have opted out of the Scheme. When we no longer need to use your information, we will remove it from our systems and records and/or take steps to properly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

How do we keep your personal information secure?

Any personal information which is collected from the date this Privacy Notice comes into force will be stored electronically, with appropriate measures being taken to ensure the security of this data. Historically, your personal information may have been collected in hard copy and any such information is held securely in physical storage units with appropriate security restrictions, preventing damage, and unauthorised access to your personal information. As part of our security measures, we may sometimes require you to give proof of your identity before we disclose personal information to you.

Changes to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, regulatory or operational requirements. We will notify you of any such changes (including when they will take effect). Your continued participation in the Scheme after any such updates take effect will constitute acceptance of those changes.