

PRIVACY NOTICE
FOR THE PIPELINE INTEGRITY INTERNATIONAL GROUP PENSION SCHEME
("the Scheme")

This notice is for members and beneficiaries of the Scheme

Adopted May 2018 (Updated 10 June 2026)

The Scheme trustees hold and process personal data about Scheme members, beneficiaries and potential beneficiaries ("**you**") in order to run the Scheme. In doing so, we are a controller of the personal data and comply with relevant data protection legislation. The PII Trustees are committed to protecting your privacy when dealing with your personal data. This Privacy Notice provides information about our processing of your personal data and your rights.

In this Privacy Notice references to "**PII Trustees**", "**we**", "**our**" or "**us**" are to the individuals and organisations who are appointed from time to time as the Scheme trustees.

We act as Data Controller in respect of your personal information that we process.

The Scheme Actuary (Mark Riches) and our Actuarial Advisers (First Actuarial) act as joint Data Controllers for the personal information that they use. This Privacy Notice also covers their role as joint Data Controllers.

This Privacy Notice is the latest version as at 10 June 2026. It will be updated from time to time. If any significant changes are made, a revised copy will be circulated to members.

You do not need to respond to this Privacy Notice, but please read it carefully.

PII Trustees

10 June 2026

Part I: Why we need your data

Why do we need to collect and use personal data?

As a controller, we may collect and process your personal data provided by you or other third parties in certain cases, for example:

- from the information provided to us by you or your employer at the time you entered the Scheme or subsequently;
- from a Scheme member, where they have nominated you as a beneficiary;
- from the trustee of another pension scheme from which you have transferred;
- in certain circumstances, for example if you lack the capacity to provide information to us yourself, from your family members, associates or representatives (including independent legal or financial advisers);
- when you interact with us during your time as a Scheme member, for example, when you fill in a death benefit nomination form and provide this to us, or as a nominated beneficiary;
- from HM Revenue and Customs (HMRC), the Department for Work and Pensions (DWP), regulatory bodies and tracing organisations; and
- if you are a user of a pensions dashboard, we may send and receive information from the dashboard about you, to allow us to search for your pension.

If you provide us with personal data relating to others (for example, your nominated beneficiaries or dependants), we understand that you are authorised to provide that information to us, and that you have provided a copy of this privacy notice to such other individuals, or otherwise made it available to them.

What personal information do we collect and process?

The personal data we may process about you includes:

- **contact and communications information**, including:
 - your contact details, including address(es), telephone number(s) and email address(es);
 - records of communications and interactions we have with you;
- **biographical information**, including:
 - your name, title, gender and current place(s) of residence;
 - your date of birth;
 - your marital or relationship status, where relevant, including any pension sharing orders in relation to divorce;
- **employment information**, including:
 - details of your employment, including details of pensionable service and employment history in regard to part-time working and career breaks;
- **financial information**, including:
 - your bank account details and PAYE tax code to process pension payments;
 - details of your pensionable salary;
 - National Insurance number and tax residence status;
 - other information relevant to the administration of your pension, including details of benefits and insurance details;
 - in respect of the use of pension dashboards:
 - your pension identifier (an online token that is used to identify you within the pensions dashboards ecosystem);
 - dates of Scheme membership;
 - date of birth (to enable pensions dashboards to show the time to retirement);
 - information about how much pension you have built up already;
 - how much you may have when you retire; and
- **sensitive information**, which may include:
 - some special categories or “sensitive” data about certain individuals for the purposes of administering the Scheme (for example in relation to ill-health or death benefits).

How do we obtain this information?

Our data comes from several sources:

- Directly from you. This may include by email, phone, letter or in person. If you contact us we may keep a record of that correspondence and our response to you.
- From your current or past employer (for example salary information) or companies that succeed them in business.
- Members of the Scheme (where you are a beneficiary of the Scheme as a consequence of that person's membership).
- Other sources including public databases, our advisers, the Scheme administrator (First Actuarial) and government or regulatory bodies including HMRC.

Where you have provided us with information about other individuals (such as family members, dependants or potential beneficiaries under the Scheme), please ensure that they are aware of the information contained within this notice.

Part II: What we do with your data

How do we use your personal information?

We may collect and process your personal data:

a) for the purposes of **complying with our legal duties to administer the Scheme or other legal obligations**, for example:

- to calculate and pay pensions, lump sum payments and related benefits under the rules applicable to the Scheme;
- to trace you in order to administer the Scheme and to ensure that Scheme benefits are distributed correctly (and for this purpose, if we lose touch with you over time, we may use publicly available information to ensure that our contact details for you are up to date, allowing us to continue to communicate with you about your membership of the Scheme);
- to meet our compliance and regulatory reporting obligations, such as compliance with anti-money laundering laws and tax reporting requirements, as well as mandatory reporting obligations to competent authorities such as the Office for National Statistics (ONS) or The Pensions Regulator;
- to provide certain pensions-related information to you as required by law;
- in relation to pensions dashboard services; and/or
- in certain circumstances, for the prevention and detection of crime and/or in order to assist with investigations carried out by the police and other competent authorities such as HMRC or DWP.

b) in cases in which **processing is necessary for our or a third party's legitimate interests** in relation to the Scheme, for example:

- to calculate and pay benefits under the rules applicable to the Scheme and provide other pensions-related services to you and to communicate with you in relation to them;
- for our internal record-keeping requirements;
- for risk management purposes including to carry out actuarial valuations and to administer, monitor and evaluate the performance of the Scheme's investments and to insure the Scheme and its investments;
- to seek advice on our rights and obligations, such as where we require our own legal advice;
- in relation to pensions dashboard services;
- to run the Scheme properly or to improve the way that the Scheme is run; and/or
- otherwise to further our objectives as set out in our Trust Deed.

c) in some cases, where this is **necessary for specific legitimate interests that are recognised in law**. These recognised legitimate interests are as follows:

- public task disclosure requests;
- national security, public security and defence;
- detecting, investigating and preventing crime; and/or
- safeguarding vulnerable individuals.

We also hold some special categories or "sensitive" data about individuals for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We must satisfy a specific condition under UK data protection laws (in addition to one or more of the lawful bases) in order to process this type of data. We will in most circumstances process this data as necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of our legal obligations in connection with employment, social

security and social protection (as allowed by legislation). If there are any occasions where we seek your explicit consent to process sensitive data then you can withdraw it at any time.

We do not currently use your personal information to make significant decisions about you by solely automated means. We will let you know if this changes.

Who do we share your personal information with?

From time to time we will share your personal data with advisers and service providers involved in running the Scheme or the provision of information on your pension benefits so that they can help us carry out our duties, rights and discretions in relation to the Scheme.

The individuals and organisations who we may share your personal information which include:

- Scheme's administrator, First Actuarial;
- Scheme actuary;
- The Scheme's sponsoring employers, PII Limited and PII Group Limited and their advisers.
- Scheme secretary;
- Legal adviser;
- Investment adviser;
- Investment consultant;
- Auditor;
- Covenant adviser;
- Benefit consultants;
- Insurance companies and financial institutions;
- Pension Insurance Corporation plc ("PIC") and their reinsurers (a link to PIC's private notice can be found at <https://www.pensioncorporation.com/content/dam/pic/corporate/documents/privacy-notices/privacy-notice-buy-in.pdf.downloadasset.pdf>). PIC is an insurance company, and the Plan has purchased an insurance policy from PIC in the form of annuities, which provide income to match pension payments for the majority of members of the Plan;
- Additional Voluntary Contribution facility providers;
- The ONS, The Pensions Regulator, HMRC, DWP and other relevant entities (including a court, government body, law enforcement agency or other authority of competent jurisdiction) when we are legally required to do so;
- Annuity providers and group life insurers and their counterparties (including reinsurers);
- Third parties in relation to the provision of pensions dashboard services (for example, the Money and Pensions Service and its service providers and our Integrated Service Provider who helps us to connect the Scheme to pensions dashboards);
- Suppliers of document production and distribution services;
- Tracing agencies and consultants; and
- Any other persons who become involved in or responsible for providing or communicating benefits, or advising us.

These organisations may use the data to perform their functions, as well as for statistical and financial modelling, business administration and regulatory purposes.

International data transfers

We, the sponsoring employers, the administrator, our suppliers and other advisers may from time to time transfer personal data outside of the UK. Under UK data protection laws, we can only transfer your personal data to another entity in a jurisdiction outside of the UK if:

- the UK government has decided that the particular jurisdiction (or international organisation) ensures an adequate level of protection of personal data (by issuing 'adequacy regulations'). A list of jurisdictions for which the UK currently has adequacy regulations in place is available [here](#). This includes all countries in the EEA. We rely on adequacy regulations for transfers of personal data to our providers and suppliers that are based in these countries;
- in cases where there are no applicable adequacy regulations, where there are 'appropriate safeguards' in place, such as standard data protection clauses (specified in regulations made by the

UK government, or in a document issued by the UK data protection authority) and provided that the level of protection for your personal data following the transfer based on these safeguards will not be materially lower than in the UK; or

- a specific exception (known as a derogation) applies under relevant data protection law in the circumstances. However, we do not routinely rely on derogations in respect of overseas transfers of personal data.

How long do we keep your personal information for?

We will only keep your personal data for as long as we need it for a specific purpose and a reasonable period afterwards to deal with any questions or complaints that we may receive about our administration of the Scheme. We may retain your data for a longer period to comply with our legal and regulatory obligations.

We will not keep your personal data for longer than 15 years after the date the Scheme is wound up.

We review personal data held in relation to the Scheme on a regular basis. If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

The Scheme Actuary and the Actuarial Advisers keep a copy of your personal data. Should we change our Scheme Actuary or Actuarial Advisers, the current provider will keep a copy of your personal data for a minimum of one year and a maximum of seven years following the change.

Part III: Your rights

What are your rights?

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- **The right to be informed:** You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This notice is an example of this right.
- **The right of access:** You have the right to obtain a copy of personal data relating to you (and other information) from us where we are processing it. This is so you are aware and can check that we are using your information in accordance with data protection law.
- **The right to rectification:** You have the right to have your information corrected if it is inaccurate or incomplete. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.
- **The right to erasure:** You have the right to request the deletion or removal of your personal data where there is no compelling reason for us to keep using it.
- **The right to restrict processing:** You have the right to restrict or suppress further use of your personal data that we process. This means that it can only be used for certain processing, such as in relation to legal claims or to exercise legal rights.
- **The right to data portability:** You have the right to receive your personal data in a structured, commonly used and machine-readable format and to request that this data is transmitted to another party/controller where this is technically feasible.
- **The right to object to processing:** You have the right to object to our processing of your personal data.

- **The right to lodge a complaint:** You have the right to lodge a complaint about our handling or processing of your personal data. (See below for further details).
- **The right to withdraw consent:** In any specific circumstances in which you have given your consent to us for the processing of any personal data, you have the right to withdraw such consent at any time (although this does not mean that any processing of personal data carried out by us with your consent up to that point is unlawful). Please note that, if we are unable to undertake certain processing necessary to administer your benefits, this may affect the provision of the pension benefits.

Your rights are subject to certain conditions. Objecting to your personal data being processed may impact on the payment of your benefits and our ability to answer questions relating to your benefits. In certain circumstances, the Scheme trustees can override a request to object to processing, to withdraw consent and to delete personal data.

If you would like to exercise any of the rights mentioned above, please contact us using the contact details below.

Information will generally be provided to you free of charge, although the Scheme trustees can charge a reasonable fee in limited circumstances.

Contact details

To exercise your rights or to contact us with any questions regarding the processing of your personal data, please contact us:

The Scheme Secretary of the Pipeline Integrity International Group Pension Scheme,
care of First Actuarial LLP (for the PII Trustees)
or First Actuarial LLP (for the Scheme Actuary or the Actuarial Advisers)

- Postal address: Mayesbrook House, Lawnswood Business Park, Leeds, LS16 6QY
- Email: leeds.admin@firstactuarial.co.uk
- Telephone: 0113 818 7300

What if you have a complaint?

You have the right to complain to us about our processing of your personal data, if you consider that we have breached the UK GDPR. To make a complaint about how we've handled your information, contact us as set out above. We will acknowledge the complaint within 30 days and investigate the complaint in accordance with our legal obligations.

If you're not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the UK data protection regulator (currently the Information Commissioner's Office). Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113

Website: <https://ico.org.uk/make-a-complaint/>

Changes to this privacy notice

We reserve the right to modify and/or update this privacy notice at any time and will make available a copy in the case of substantive changes.

This policy was last updated on 10 June 2026.