

## **The Sharp Electronics (UK) Limited Pension Scheme - Privacy notice**

We are sending you this privacy notice because you are a member of the Scheme.

As Trustees, we process 'personal data' about you in order to run the Scheme and pay benefits. We also share your personal data with some other people.

This privacy notice describes what personal data we collect about you and other people whose personal data may be provided to us in connection with your Scheme membership (for example, your spouse, civil partner, partner or dependants).

It also describes how we process (i.e. handle) your personal data, the basis upon which we process it, with whom it is shared, how it is stored, how it is protected and what rights you have in relation to it (including a right to object to processing in certain circumstances).

**Please read this privacy notice carefully as it contains important information.**

### **1. 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;
- we may collect certain personal data from third parties (please see below);
- we may also generate certain personal data in our running of the Scheme (for example, information relating to your contributions and benefits).

We collect personal data from the following third parties:

- your current or former employer;
- any financial or other adviser or representative acting on your behalf and, if you want to transfer benefits, 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 personal data (for example, to trace your current address or to verify your continuing existence); and
- public databases (for example, the register of births, deaths and marriages), government agencies (for example, His Majesty's Revenue and Customs (HMRC) or the National Insurance Contributions Office (NICO).

The types of data we may collect and use is set out in section 11 below.

In certain circumstances, we may ask you for personal information which is more sensitive. Examples would be where we ask for information that may reveal your racial or ethnic origin, religious beliefs, sex life or sexual orientation, or information relating to your health (for example, if you cannot work any longer due to incapacity and you want to take your pension benefits early).

When we ask for sensitive information, we will only ask for as much information as we need. We will also explain to you why we need that information and how we intend to use it.

When we need to, we will ask for your consent for us to use your sensitive information, or information about criminal convictions and offences. However, there are some cases in which we do not need your consent. In those cases, we will still explain to you how we intend to use it.

You may also need to provide us with personal data relating to other people (for example, your spouse, civil partner, partner or dependants). When you do so, you will need to 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 privacy notice.

### **2. How do we use your personal data?**

We primarily use your personal data for the purposes of operating the Scheme. This includes to calculate and pay your benefits, to communicate with you and to make decisions about you and your options and entitlements and, in due course to connect you with the Pensions Dashboard.

It also includes matters to do with the wider operation of the Scheme. For example, we use personal data to calculate the Scheme's liabilities and the sums that the employers need to pay to the Scheme. We may also use personal data to set up insurance policies to meet Scheme liabilities, in connection with liability management exercises, transferring your benefits to another scheme or arrangement, a scheme merger, or any proposal to make changes to the Scheme's benefits.

We will also use your personal data for the purposes of complying with any laws, procedures and regulations which apply to us, answering questions, dealing with complaints and in order to exercise or defend our legal rights.

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 this is usually completed on an anonymous basis.

If we or other data controllers involved with the Scheme wish to use your personal data for any additional purposes, we will update this privacy notice.

### **3. What is our lawful basis or ground for using your personal data?**

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

As Trustees, we have certain duties and powers which are conferred on us by law or by the Scheme's governing documents. In most cases, our processing of your personal data is necessary for the performance of those duties and exercise of those powers.

Certain 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 for the purposes of our legitimate interests or the legitimate interests of a third party. They may also be in your interests.

When we say "legitimate interests", we mean ours (or a third party's) interests in operating the

Scheme as efficiently and securely as possible. For example, we may choose to use a third party to store your personal data; we may do this in part because our use of that service means that your personal data is more secure.

If we rely on our (or a third party's) legitimate interests for using your personal data, we will undertake a balancing test to ensure that our (or the third party's) legitimate interests are not outweighed by your interests. You can ask us for information on this balancing test by using the details in section 10 of this privacy notice.

If we are processing personal data in a certain way because it is in ours (or a third party's) legitimate interests (and not, for example, because it is necessary for the performance of our legal duties), you have the right to object to this processing.

In certain circumstances, we will need your consent to collect and use your personal data; this is most likely where we are collecting and using information relating to your health, or where we obtain information that may reveal your racial or ethnic origin, religious or similar beliefs, sex life or sexual orientation. If we have asked for your consent, 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 us using the contact details in Section 12 of this privacy notice.

However, if you withdraw your consent or object to our processing of your personal data, this may impact our ability to consider whether you are eligible to receive benefits, put your benefits into payment, and/or continue to pay benefits to you.

### **4. In what circumstances do we share your personal data?**

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

- your current or former employer - for the purposes of operating the Scheme, or the future operation of the Scheme;
- our administrators – we delegate some of our duties as Trustees to administrators; they are effectively

responsible for the day-to-day running of the Scheme, including connecting to the Pensions Dashboard;

- the Scheme actuary – this is an actuary that is personally appointed to the Scheme to provide us with advice on the funding of the Scheme. 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 Scheme including the level and form of benefits to be provided to members of the Scheme, investment, member communication and strategies for managing and mitigating the risks associated with the Scheme;
- our insurers – they provide insurance cover for the payment of death benefits and/or provide annuity policies securing the Scheme benefits;
- our investment managers and AVC providers – they invest the Scheme assets on our behalf;
- our annuity broker/retirement advice/support service;
- our auditors – they prepare the Scheme's annual accounts and audit them for us;
- our lawyers – they advise us on all legal issues affecting the Scheme, including connection to the Pensions Dashboard;
- our covenant advisers – they advise us on the financial support that your current or former employer may be able to provide to the Scheme;
- our payroll agents – they arrange payment of pensions;
- our indemnity insurers;
- any staff we employ and other companies that provide services to us (or to our administrators), such as communications consultants, printers, suppliers of data cleansing, verification and tracing services and information

technology systems suppliers and support, including providers of data storage, email archiving, back-up and disaster recovery and cyber security services;

- 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 (for example, HMRC and NICO).

The names and contact details of the third parties that we share your personal data with are available from us on request by contacting us using the contact details in Section 12 of this privacy notice.

Some of these third parties process your personal data in countries which are outside of the European Economic Area (EEA). Please see below.

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.

As Trustees, we are a 'data controller' of your personal data. This means we are responsible for keeping your personal data safe and secure.

Some of the third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us. They are known as 'data processors'

However, certain third parties (most notably, the Scheme actuary, benefit consultants, insurers, auditors, lawyers and other professional advisers) are subject to certain legal or

regulatory obligations, including professional codes of practice. They will be 'data controllers' (and so directly responsible to you for their own processing of your personal data) to the extent that processing is subject to, or relates to, those obligations.

Some of these data controllers have their own, separate, privacy notice which applies to their use of your personal data instead of this privacy notice. The names and contact details of these data controllers are available from us on request by contacting us using the contact details in Section 12 of this privacy notice.

**5. Do we transfer your personal data outside the UK?**

In certain circumstances, your personal data may be processed outside of the UK; for example, by individual trustees who are operating or travelling outside the UK and by third party service providers that may store certain personal data in a country outside the UK.

When we (or our service providers) process personal data outside of the UK, we 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.

In the table below, we have set out in which countries outside of the UK we process your personal data, the mechanism we use for safeguarding your personal data in those circumstances (as required by law) and where you can find further information:

Country	Safeguard for protecting your personal data	Further information
United States of America	The Scheme administrator uses a UK company for making overseas payments. The data for this UK company is	For further information please contact us using the contact details set out in section 12 of this privacy notice

	<p>hosted within the United States of America by a third party.</p> <p>The third party has signed up to the UK extension of the EU – US Data Privacy Framework to ensure that personal data transferred to the United States of America from the UK receives the same data protection as is consistent with UK law.</p>	
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**6. How long do we retain your personal data?**

We keep your personal data for no longer than we need to for the purposes for which we use it as set out in section 2 of this privacy notice.

We will need to keep your personal data for as long as you are a member of, or receiving benefits from, the Scheme. If you die, we will continue to hold your personal data to pay any benefits due to your spouse, civil partner, partner or dependants. If your spouse or dependants subsequently die or you transfer out of the Scheme during your lifetime, we may also keep your personal data for a period of at least six years for the purposes of defending any future claims or establishing, exercising or defending our legal rights.

We will also keep your personal data for as long as necessary to answer any questions about the administration of the Scheme, deal with any complaints or claims, exercising or defending our legal rights, or complying with any legal or regulatory requirements. We will keep your personal data even if you have no spouse, civil partner or dependants, or if your spouse, civil partner or dependants die, or if you transfer out of the Scheme.

We need to keep your personal data this long because of the long term nature of pension schemes, and the fact that questions can arise many years after someone has died or left the Scheme. However, where we can, we will delete personal data that we no longer need in order to minimise information security risk.

## 7. What are your rights in relation to your personal data?

You have the following rights in relation to your personal data. You can ask us for more information about any of these rights by contacting us using the contact details in Section 12 of this privacy notice;

- (a) **Right of access.** You have a right of access to any personal data we hold about you, including asking us for a copy of your personal data;
- (b) **Right to update your information.** You have a right to request an update to any of your personal data which is out of date or incorrect;
- (c) **Right to delete your information.** You have a right to ask us to delete any personal data which we are holding about you in certain specific circumstances;
- (d) **Right to restrict use of your information:** You have a right to ask us to restrict the way we process your personal data in certain circumstances;
- (e) **Right to data portability:** You have a right to ask us to provide your personal data to a third party provider of services in certain circumstances;
- (f) **Right to object.** Where we process your personal data on the basis of our, or another person's, legitimate interest, you have a right to ask us to consider any valid objections which you have to our use of your data.

We will consider all requests from you to exercise your rights (including whether they apply in a particular case) and provide our response within a reasonable period. In any event, we will provide a response within one month of your request, unless we tell you we are entitled to a longer period.

Please note that certain personal data may be exempt from such requests, for example if we need to keep using the information to comply with our own legal obligations. If an exception applies, we will tell you this. When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity.

## 8. How do we keep your personal data secure?

The main risk of our processing your personal data is if it is lost, stolen or misused. For these reasons, we are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and to take all reasonable precautions to safeguard the confidentiality of personal data.

Although we make every effort to protect the personal data 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 in this way, and that any such transmission is at your own risk.

Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access, and take steps to ensure that any third parties with whom we share data do the same).

Where we have given you (or where you have chosen) a password which enables you to access an account relating to your membership of the Scheme, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## 9. Changes to this privacy notice

We may amend this privacy notice from time to time. Any changes we make will be notified to you in the next communication from us, such as the annual summary funding statement, your annual benefit statement (if sent), member newsletter, or an updated version of the explanatory booklet.

## 10. Further questions or complaints

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 described above, please contact us

using the contact details in Section 12 of this privacy notice.

We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data under the Scheme's Internal Dispute Resolution Procedure.

You may also make a complaint to the UK Information Commissioner's Office (<https://ico.org.uk/>), the UK's data protection regulator, or a different regulator in the country where you usually live or work, or where an alleged infringement has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

## 11. Personal data we process

We may collect and use the following types of personal data about you and, in some cases, your spouse, civil partner, partner or dependants:

- name(s);
- gender;
- national insurance number;
- employee and membership number;
- date of birth
- home address and telephone number;
- personal e-mail address;
- marital status and family / dependants (e.g. benefits payable on death);
- your current or former employer;
- the date you joined and left employment and employment status (e.g. full time or part time);
- dates on which you joined and left pensionable service;
- your salary information;
- your normal or anticipated retirement date;
- your status as a member of the Scheme;
- circumstances of retirement or leaving service;
- information relating to your health (e.g. in relation to incapacity and benefits);
- information relating to your benefits under the Scheme (including any contracted-out benefits);
- information relating to any money purchase benefits in the Scheme (including how these are invested);
- information relating to any pension sharing or earmarking order;
- your income tax band and any protections that you may have in relation to your pension benefits; and
- your bank account details.

## 12. Defined terms

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

**Scheme** means The Sharp Electronics (UK) Limited Pension Scheme.

**Trustees, us, we** or **our** means the trustees of the Scheme being Ross Trustees Services Limited, Dr Phelim Daniels, Toby Cooper, Richard Bloom and Danisha Bhobun or such individuals who act as trustees from time to time.

The Trustees may be contacted via email at [SharpPensions@isio.com](mailto:SharpPensions@isio.com).

The Trustees may also be contacted via post at the following address:

Trustees of the Sharp Electronics (UK) Limited Pension Scheme  
c/o Isio  
PO Box 108  
Blyth  
NE24 9DY

**This privacy notice was last reviewed and updated on 10 June 2026.**