

Privacy Notice

Clara Pensions Group

Clara-Pensions Group Limited and Clara-Pensions Limited (together, Clara-Pensions") holds and processes personal data about the members and beneficiaries of the pension schemes that are subject to potential bulk transfers to the Clara Pensions Trust, in order to assess and provide pricing for the transaction.

What we do with your data

As a controller, we use personal data that is provided to us by or on behalf of the trustee, or sponsoring employer of a pension scheme (or an agent) for the purposes of assessing feasibility of a transaction and providing pricing in relation to a potential transaction with us. In some cases, we will then process the personal data in order to prepare for a bulk transfer into the Clara Pension Trust. We process this data for legitimate purposes relating to the operation of our business, and in particular in order to be able to advise on the feasibility and pricing of a potential transaction with us. We have considered the legitimate interests pursued by us (as well as that of the trustee of a pension scheme that may bulk transfer their assets and liabilities across) and have determined that such interests are not overridden by the interests or fundamental rights and freedoms of the data subjects. When receiving this data, we ensure that we obtain a commitment from the person providing the data to us on behalf of the trustee that they have the relevant authority and grounds under legislation to share that data with us.

The data we hold is limited to that required in order to progress the potential transaction as outlined above. It is provided on a pseudonymised basis wherever possible and is likely to include, date of birth, postcode, gender, date of joining scheme / employment, date of leaving scheme / employment, marital status, date of birth of any spouse, date of birth of any dependant, salary information, pension amount(s).

We will also hold some special categories or "sensitive" data about individuals (for example in relation to ill-health). We might also, very rarely, have information about criminal convictions and offences where it is relevant. We will 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).

Who else processes your data?

We may share your personal data with certain third parties who assist us with the feasibility and pricing process, including our actuarial advisers, Clara Trustees Limited as Trustee of the Clara Pension Trust and our actual or potential: insurers, reinsurers, hedging counterparties, finance providers, independent financial advisors, administrators, quotation service providers, investment managers, software providers, tracing agents or longevity and mortality counterparties.

We will from time-to-time transfer data to other countries, including outside the UK, the EU and wider European Economic Area. Where such transfers are made, the parties involved will ensure

adequate safeguards are in place. You can contact Clara-Pensions (please see contact details below) for more information about the safeguards and transfer mechanisms being used including to ask for copies of them.

If a decision is made to proceed with a transaction with us, personal data will be transferred to Clara Trustees Limited as Trustee of the Clara Pension Trust. Clara Trustees Limited has its own privacy notice providing information regarding its use of personal data.

Storage of your personal data

We store your information until such time as we will no longer need it; we will ensure that we delete all personal data related to the transaction within one month of the end of any lawful basis that we have for processing the data. If the transaction does proceed, we will limit the personal data retained to that required to perform our role in supporting Clara Trustees Limited.

Your rights

You have the right to access your personal data and, require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing, or request a copy of your personal data for the purposes of transmitting elsewhere.

Contact details

If you have any questions about this, please contact our data protection liaison officer on:

Data Protection Liaison Officer

Clara-Pensions Limited

120 New Cavendish Street

Fitzrovia

London W1W 6XX

dataprotection@clara-pensions.com

What if you have a complaint?

To make a complaint about how we've handled your information, contact us as set out above.

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 Information Commissioner's Office. Its contact details are:

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

Telephone number: 0303 123 1113 or 01625 545 700