

# Grundfos Pumps Limited and Subsidiary Companies

## Retirement and Death Benefit Scheme

### Privacy Notice

#### 1. Introduction

This privacy notice details the ways in which the Trustees ("Trustees" or "we", "our", "us") of the **GRUNDFOS PUMPS LIMITED AND SUBSIDIARY COMPANIES RETIREMENT AND DEATH BENEFIT SCHEME** (the "**Scheme**") collect and utilise your personal data, as a member of the Scheme.

We are required under UK data protection legislation (the UK General Data Protection Regulation ("**UK GDPR**") and the Data Protection Act 2018 ("**DPA**"), to notify you of the information contained in this privacy notice. This is because the Trustees act as 'data controllers' in respect of your personal data that we 'process' (i.e. collect, store, transmit and erase) and are responsible for deciding how and why such personal data is processed..

You are receiving this notice because you are (or were) a member of the Scheme, have applied to join, or may be a beneficiary (for example, a spouse, civil partner, child or other dependant).

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we use your personal data.

#### 2. Who We Are and How to Contact Us

The Trustees of the Scheme act as the 'data controller', which means we decide how and why your personal data is processed for the purposes of running the Scheme. The Trustee Board will change from time to time. Our Scheme administrator acts on our instructions as a 'data processor' for day-to-day administration.

If you have any general queries, you can contact us via the Scheme administrator at:

Cartwright Benefit Consultants	Contact:	Chris Jordan
Marlborough House	Email:	chris.jordan@cartwright.co.uk
Victoria Road South	Tel No:	01245 293300
Chelmsford		
Essex		
CM1 1LN		

Alternatively, for any enquiries in relation to the processing of personal data or the Trustees' compliance with data protection legislation, you can contact us directly at the following address:

c/o Grundfos Pumps Limited	Email:	<a href="mailto:jmorley.trustee@gmail.com">jmorley.trustee@gmail.com</a>
Grovebury Road	Tel No:	07809 719502
Leighton Buzzard		
LU7 4TL		

### 3. Categories of Data We Hold About You and How we Collect it

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

**From you directly:** For example, when you join the Scheme, complete forms, contact us with queries, or apply for benefits, you provide information to us.

**From your employer (or former employer):** Your employer may provide us with information necessary for administering your benefits (such as your identifying and employment details, salary, service history, etc.)

**From other third parties:** We may receive information from your representatives or advisers (for instance, financial advisers or legal representatives you have appointed). If you transfer benefits to or from another pension arrangement, we might receive information from the administrators or trustees of that arrangement. We might also receive information from government bodies or public authorities (for example, His Majesty's Revenue and Customs (HMRC), the National Insurance

Contributions Office (NICO), or pension regulators) and from public records (such as birth, marriage, civil partnership or death registers). In some cases, we use tracing agencies or data verification services to ensure our records are up to date (for example, to locate you if we lose contact with you, or to confirm you are still alive).

**Generated by us:** In operating the Scheme, we create or derive data about you. For example, we calculate your benefits and contributions history, determine eligibility for certain options, and keep records of communications and payments.

The following is a list of the personal data or categories of personal data about you that we may collect, store, use and/or otherwise process:

- **Identity details:** name, (including any former names), addresses, e-mail addresses, telephone numbers, date of birth, gender, country of residence/geographical location, marital status (including details of any marriage or civil partnership certificates, decree absolutes or final orders), birth/adoption certificate details, National Insurance number, employee number/member number/individual reference number, passport number/ID card number.
- **Employment and membership details:** including salary/remuneration, employment history, contracting-out record, dates you joined and left employment and pensionable service, employment status (for example, full-time/part-time), membership status and normal/anticipated retirement date, period of pensionable service details.
- **Pay, tax and payroll information:** including tax information, PAYE details (including tax code where relevant).
- **Banking and payment details:** including bank account details for payment of benefits.
- **Data concerning benefits payable to or in respect of a member:** including records of contributions and Additional Voluntary Contributions (AVCs), death benefit distribution information (such as expression of wish forms), date of joining the Scheme, retirement date, choices you have made in relation to the Scheme, any relevant matters impacting on your benefits (such as AVCs, pension sharing orders, tax protections or other adjustments), and any relevant court orders or directions affecting benefits.

- **Family, nominees and dependants information:** where relevant to the assessment and payment of benefits (for example, details provided on expression of wish or nomination forms).
- **Authorised representative information:** (for example, details of a financial adviser, attorney or personal representative) where they act on your behalf.
- **Records of communications and interactions with us and/or the Scheme administrator** (for example, queries, benefit options and elections, and our decisions).
- **Any technical information (IP addresses etc.)** where we operate web-based interaction or provide access to online member portals.
- **Pensions identifier:** if you use the pensions dashboard to access information about your pension, a "pension identifier", which is used to confirm a match and identify your specific benefits under the Scheme for the purposes of displaying information via the pensions dashboard.

#### 4. Special category and criminal-offence data

We may hold and process special category personal data about you, (including, but not limited to, information such as health information), where this is necessary for the administration of the Scheme and the payment of benefits. This type of personal data is more sensitive and is subject to additional protections under data protection legislation.

The circumstances in which we may process such information could include situations where a member applies for ill-health early retirement benefits or where medical evidence is required in connection with the assessment or payment of benefits.

We will generally process special category personal data where this is necessary for the purposes of carrying out our obligations and exercising our rights (e.g. for the assessment of your entitlement to benefits (Article 9(2)(b) and/or 9(2)(h) UK GDPR and Schedule 1 to the Data Protection Act 2018), and, where relevant, for the establishment, exercise or defence of legal claims (Article 9(2)(f) UK GDPR).

In very limited circumstances, we may also process information relating to criminal convictions or offences where this is relevant (for example, to comply with legal obligations), in accordance with Article 10 UK GDPR and Schedule 1 to the DPA.

We will only process special categories of personal data on the basis set out above; if we need to rely on your consent (which we anticipate only in limited situations), we will explain to you at the time why we need it and how the information will be used.

Where you have given your consent to the processing of your personal data, this can be withdrawn at any time. If you do withdraw consent, this will not affect the lawfulness of any processing that was based on your consent before its withdrawal. Please note that withdrawing consent may affect our ability to consider eligibility for certain benefits where consent is the relevant basis.

## **5. Third Party Personal Data**

We may also process personal data relating to beneficiaries, dependants or other individuals who may become entitled to benefits under the Scheme, such as a partner, spouse, civil partner or child.

If you provide us with personal data relating to another person, such as your partner, spouse, civil partner or dependants, nominees, beneficiaries or authorised representatives (for example, a financial adviser or attorney), you should ensure that the individual is aware that you are sharing their personal data with us and that you have authority to do so. You should also share this privacy notice with them and ensure that they are aware that they can request a privacy notice or request a copy by contacting the Scheme administrator or the Trustees using the contact details in section 2 above. We will use such personal data in accordance with this privacy notice (for example, to assess and pay benefits) and may contact those individuals directly where appropriate. Please only provide information that is relevant and necessary and ensure it is accurate and up to date.

## **6. Why We Hold Personal Data About You**

We collect your data for the primary purpose of operating the Scheme. This involves:

- Communicating with you — sending statements, updates, and responding to your queries and requests.
- Maintaining records — keeping accurate records of members, beneficiaries and transactions, and updating information (for example, contact details or marital status) as needed.
- Assessing entitlements and paying benefits — calculating your pension or other benefits, determining eligibility for certain benefits (such as ill-health or survivor benefits), and making payments to you or your beneficiaries.
- Managing contributions and assets — keeping track of contributions (if applicable), managing any Additional Voluntary Contributions (AVCs) or defined contribution elements of the Scheme, and investing the Scheme's assets (including liaising with investment managers or AVC providers).
- Benefit options and transfers — handling requests to transfer your benefits to or from another scheme, providing information about option exercises (for example, benefit choices at retirement), and facilitating annuity purchases or other insurance solutions for securing benefits.
- Risk management and Scheme security — taking steps to reduce or manage risks to the Scheme (for example, funding, investment, longevity or identity-fraud risks), purchasing insurance (such as buy-in/buy-out policies or life cover for death benefits), and monitoring the covenant (financial strength) of the sponsoring employer.
- Regulatory compliance and legal obligations — complying with our duties under pension and trust law, HMRC requirements, the rules of the Scheme, and guidance or codes of practice from the Pensions Regulator. This includes preparing actuarial valuations and funding reports, audits of the Scheme's accounts, reporting to and providing information required by HMRC, operating PAYE and managing tax charges, and preparing Scheme accounts.
- Handling disputes, inquiries or legal matters — addressing any complaints or disputes related to benefits, dealing with internal dispute resolution procedures or Pensions Ombudsman cases, and establishing, exercising or defending legal claims.
- Managing the Scheme's liabilities and corporate events — managing the Scheme's liabilities and dealing with the sale, merger or reorganisation of the Scheme employers.

- Analytics and reporting — undertaking statistical analysis and responding to government or regulatory surveys, usually using anonymous or de-identified information.
- Connection with, and making your information available via, the pensions dashboards in accordance with legislative requirements.

If we plan to process your personal data for any other purpose than the purpose(s) for which we collected it, we will update this privacy notice, bringing any material changes to your attention.

## 7. Legal Basis for Processing

Each time we process your data for a particular purpose, we must have a legal basis for processing.

We need to process all of the categories of your personal data that we have listed above, primarily to comply with our legal obligations under pensions, trust and tax law (including for example our obligations under the pensions dashboards regulations) and Article 6(1)(c) of the UK GDPR, to which we are subject as Trustees of the Scheme. However, where processing is not necessary to comply with our legal obligations, we will need to process this personal data nevertheless for the purposes of pursuing the Trustees' and/or a third party's (i.e. the members' or employer's) 'legitimate interests' within the meaning of Article 6(1)(f) UK GDPR..

Our 'legitimate interests' are to operate the Scheme effectively, securely, lawfully and efficiently. This allows us to ensure that members and beneficiaries receive the benefits and choices to which they are entitled in accordance with the law and the governing documents of the Scheme and any other options which may be made available to them. It also means we can manage risks in the Scheme and exercise all our powers, duties and discretions in relation to the Scheme. Where we rely on legitimate interests, we consider and balance any potential impact on you and your rights. You have the right to object to processing based on legitimate interests—see "Your rights" below.

Special category/criminal-offence data: Where we process more sensitive "special category" personal data (for example, health information for ill-health applications), we generally do so because it is necessary under Article 9(2)(b) and/or 9(2)(h) UK

GDPR together with Schedule 1 of the Data Protection Act 2018, and, where relevant, under Article 9(2)(f) for the establishment, exercise or defence of legal claims. In very limited circumstances we may process criminal-offence data in accordance with Article 10 UK GDPR and Schedule 1 of the Data Protection Act 2018. We maintain an Appropriate Policy Document as required by law.

Consent: We do not generally rely on consent to administer the Scheme. If we do ask for consent (for example, in limited cases involving certain health or other sensitive information), you may withdraw it at any time. Withdrawing consent will not affect the lawfulness of processing based on consent before its withdrawal, but it may affect our ability to assess eligibility for certain benefits.

## **8. Sharing Your Information**

We share or may share your personal data with the following categories of recipients, to the extent we consider such disclosure is reasonably required:

- Your current or former employer — to operate the Scheme and assess eligibility/benefits.
- Scheme administrators (e.g. Cartwright) — day-to-day administration and member record-keeping.
- Scheme Actuary and actuarial team — funding advice, valuations and calculations.
- Benefit consultants; investment managers/consultants; AVC and other DC providers — investment of Scheme assets and DC/AVC administration.
- Insurers — death/income-protection cover and annuity/buy-in/buy-out policies.
- Auditors; lawyers; covenant advisers — accounts, legal advice and employer covenant assessments.
- Medical professionals — assessing ill-health applications.
- Payroll agents — paying pensions/lump sums and operating PAYE.
- Service suppliers to us/our administrators — communications/printing; data cleansing/verification/tracing; IT services (storage, email archiving, back-up/disaster recovery, cyber security).

- Your appointed financial adviser and trustees/managers of receiving or transferring pension schemes — where you transfer or consider transferring benefits.
- Statutory bodies, regulators and government agencies — e.g. HMRC, the Pensions Regulator, Pension Protection Fund, and bodies dealing with contracted-out benefits.
- Beneficiaries, personal representatives and other authorised third parties — where needed (e.g. death-benefit administration or dealing with your affairs).
- Organisations within the pensions dashboard ecosystem, where you use a pensions dashboard to access information about your pension. When a member searches for information about their pensions online via a pensions dashboard, we receive certain personal data for the purposes of identifying a match with the member's pension. We then provide certain pensions information to the pensions dashboard ecosystem so that it can be displayed via the dashboard.

Some of the third parties with whom we share your personal data act on our documented instructions as data processors and are contractually required to implement appropriate confidentiality and security measures and only process your personal data for our specified purposes. Other third parties (for example, the Scheme Actuary and actuarial team, insurers, auditors, lawyers and certain advisers) act as separate data controllers for the services they provide and are responsible for their own compliance with data protection laws. Further information about the parties with whom we share data is available by contacting us using the details in section 2 above.

## **9. Transferring Your Personal Data Outside the UK and Appropriate Safeguards**

In certain circumstances, your personal data may be processed outside of the UK; for example, by 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.

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.

There are several measures for ensuring an adequate level of protection including ensuring that the processing occurs in certain countries that have been deemed "adequate" by the Secretary of State in the UK (which includes the countries within the European Economic Area), or incorporating standard contractual clauses approved for use in the UK into our contracts with service providers based outside the UK).

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).

## **10. How We Keep Your Data Secure**

We are committed to protecting your personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and to keeping your data secure. We take all reasonable precautions to safeguard the confidentiality of your personal data.

We have strict procedures and security features to prevent unauthorised access of your personal data.

We also take steps to ensure that any third parties with whom we share your personal data keep your personal data secure.

## **11. How Long We Will Hold Your Data For**

Your personal data will only be kept for the purpose of the operation of the Scheme. We keep it for no longer than is necessary for those purposes, to meet legal/regulatory obligations, and to establish, exercise or defend legal claims.

Therefore, given the long-term nature of pensions, this is likely to be held for the duration of you being a member of the Scheme and, where applicable, while you are receiving benefits.

If you cease being a member because you die, we may continue to hold your personal data for the purpose of distributing survivor's benefits to your partner/spouse/civil partner, dependants or other beneficiaries. We may also retain limited information to answer queries about the administration of the Scheme and benefits paid to your estate or beneficiaries.

Additionally, we may keep your personal data for a period of at least six years for the purpose of defending or establishing a legal claim or exercising our legal rights - for example, to record that you transferred out of the Scheme. In some cases, we may need to retain certain records for longer where required by law or where necessary to evidence benefits and decisions made.

We will retain personal data we process in connection with pensions dashboards for the maximum periods specified in the pensions dashboards regulations.

In any event, we will not keep your personal data for longer than we need to. We apply data minimisation and archival practices (for example, retaining a restricted "member index" with the minimum data needed for long-term purposes) and we review retention periodically. Where feasible, we anonymise or de-identify data.

## 12. Your Rights Regarding Your Personal Data

You have certain rights in relation to your personal data:

**Access request** – request access to personal data that we hold about you. This includes receiving a copy and certain supplementary information.

**Correction** – request that we correct any incomplete or incorrect personal data about you. Where feasible, we will also notify recipients of the correction.

**Erasure** – request that we delete or remove personal data that we hold about you where there is no good reason for us to continue to process it. This right is limited

where we need the data to comply with legal obligations or to establish, exercise or defend legal claims.

**Restriction** – request that we restrict the way your personal data is processed in certain circumstances (for example, while we verify accuracy or consider an objection).

**Objection** – if we are processing your personal data because it is in our legitimate interests, you can object to this processing on grounds relating to your particular situation. We will stop unless we can demonstrate compelling legitimate grounds or the processing is needed for legal claims.

**Transfer** – request that your personal information is transferred to a third party (data portability applies only to personal data you provided to us, which we process by automated means and on the basis of consent or contract)

If you want to exercise any of these rights or if you have any questions, please contact us using the details provided in section 2 above, providing sufficient detail.

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.

For further information on each of these rights, including the circumstances in which they each apply, see: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

### **13. Changes to This Privacy Notice**

We may amend this privacy notice from time to time, as appropriate. We will notify you of any material changes.

### **14. Further Questions or Any Complaints**

If you have any questions regarding anything detailed in this document or wish to make a complaint, please contact the Trustees using the details provided in section 2 above.

You may also make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, using the following web link: <https://ico.org.uk/concerns/> or by telephone: 0303 123 1113

**November 2025**