

Privacy Notice

Greggs Final Salary Pension Scheme

Introduction

Greggs 1978 Pension Scheme Trustee Limited, ("**we**" or "**us**") as the corporate trustee of the Greggs Final Salary Pension Scheme ("**Scheme**") takes data protection very seriously and respects the privacy of our members. We are committed to protecting and respecting your privacy, in accordance with the UK General Data Protection Regulation ("**UK GDPR**"). This statement explains how we collect, use and share your personal data. Please take time to read this statement carefully so you understand how we treat and use your personal information.

We are registered at Companies House under company number 07506736 and our registered office is at Greggs House, Quorum Business Park, Newcastle upon Tyne, NE12 8BU.

We are also registered with the Information Commissioner's Office under registration number Z2777230.

Scheme Actuary

Ben Roach is the Scheme Actuary of the Scheme and is a "joint data controller" with the Trustee (the holders, users and processors of personal data) for the purposes of the UK GDPR. The Scheme Actuary will process your data in line guidelines outlined in this statement.

The Scheme Actuary uses your personal data to advise the Trustee(s) on the financial management of the Scheme. This advice helps to ensure the Trustee is able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

Information we may collect from you

We may collect and process personal information which you provide to us in connection with the Scheme. This may include:

- your full name;
- your contact details;
- your email address;
- your date of birth;
- your gender;
- your marital status;
- information as to your contributions to and options exercised under the Scheme;
- information as to your family members and dependents; and
- where benefits are payable to you, your bank account details.

In addition, we may in some circumstances also hold and process personal information about you which is deemed "sensitive" for the purpose of GDPR, such as information about your health if you apply for ill-health retirement benefits.

Information which we may collect from others

We may collect and process personal information about you received by us from Greggs plc. This may include information relating to your employment, salary and benefit rights (to the extent relevant for the purpose of the Scheme). We may also on occasion collect personal information relating to you from other third parties, such as HM Revenue & Customs and other regulatory authorities.

Processing your personal data

GDPR says that we are allowed to use personal information only if we have a proper reason to do so which may be:

- To fulfil a contract we have with you; or
- When it is our legal duty; or
- When it is in our legitimate interests; or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you.

We will process your personal information and the personal information of other people (such as your dependents) provided by you for the purpose of the governance and administration of the Scheme, including in particular the calculation, funding, securing and payment of your benefits. This means that we will process personal data for the purpose of our legitimate interests which we, as trustees of the Scheme are pursuing; namely the governance and administration of the Scheme.

If we are required to process sensitive personal information, we will approach you or the relevant individuals for specific consent to the processing.

Retention of personal data

We will hold your personal information for as long as may be necessary in order to administer your benefits and to maintain a record of steps which we have taken in relation to the Scheme. In general, we will keep your information until your death, so that we are able to address any queries you may have during your lifetime. Where benefits are payable to your beneficiaries, we may need to keep personal information in respect of you and your beneficiaries for longer.

We will review our retention management policy regularly having regard to the Scheme's operational and legal requirements.

Disclosure of personal data

We may disclose your personal information to the following third parties in connection with services which are provided to us in relation to the Scheme:

- Administrators;
- Actuaries;
- Accountants;
- Lawyers;

- Investment advisers;
- Insurance and investment providers and
- Other service providers associated with the governance and administration of the Scheme.

We will ensure that your personal information is processed in accordance with our instructions and in circumstances which require the recipient to observe industry standard security measures in respect of the handling of your personal information.

We may in any case disclose your personal information to a third party where necessary in order to comply with a legal obligation (for example to comply with any investigations by any pensions regulator or pensions ombudsman).

We will not:

- Sell your personal information to third parties; or
- Share your personal information with third parties, or use it or ourselves, for marketing purposes (unless you have given your consent for us to do so).

Transfers of personal data outside of the UK

We will not transfer your personal information outside the UK unless such transfer is compliant with the UK GDPR. This means that we cannot transfer any of your personal information outside the UK unless:

- The UK Government has decided that another country or international organisation ensures an adequate level of protection for your personal information; or
- The transfer of your personal information is subject to appropriate safeguards, which may include:
 - Binding corporate rules; or
 - Standard data protection clauses adopted by the UK Government; or
- One of the derogations in the UK GDPR applies (including if you explicitly consent to the proposed transfer).

Automated decision-making

We do not envisage that any decisions will be taken about you using automated means.

How can you find out about and update your information?

You have the right to ask for a copy of the personal information that we hold about you.

If you wish to do so, please contact us:

- By email at data.protection@greggs.co.uk;
- By post for the attention of the Data Protection Representative, Greggs plc, Greggs House, Quorum Business Park, Newcastle upon Tyne, NE12 8BU.

In order to fulfil your request, we may need to first verify your identity.

Any questions regarding this Privacy Notice or to request an accessible format of this Privacy Notice please use the contact details above.

The accuracy of your information is also important to us. If you change contact details or if you believe that any of the other personal information we hold is inaccurate, incomplete or out of date, please contact us:

- By email at finalsalary@greggs.co.uk;
- By post for the attention of the Pensions Team, Greggs plc, Greggs House, Quorum Business Park, Newcastle upon Tyne, NE12 8BU;
- By telephone on 0191 281 7721 and ask to speak with our Pensions Team.

In addition to your rights set out elsewhere in this Privacy Notice, you also have the right to:

- Request details from us of the recipients of your personal information or the categories of recipients of your personal information, if it is supplied by us to any third parties;
- In certain circumstances have the processing of your personal information restricted;
- In certain circumstances be provided with the personal information that you have supplied to us, in a portable format that can be transmitted to another company;
- In certain circumstances not to be subject to a decision that is based solely on automated processing which would have a legal or significant impact on you.

If you wish to exercise any of the rights set out above, you must make the request in writing addressed to the "*Data Protection Representative*" using one of the methods set out in the "*How can you find out about and update your information?*" section of this Privacy Notice.

Withdrawal of consent

If you have provided your consent for us to process your personal information, you have the right to withdraw your consent at any time. This will not affect the legality of our consent-based use before you withdrew your consent.

If you wish to exercise your right to withdraw your consent, you must make the request in writing addressed to the "*Data Protection Representative*" using one of the methods set out in the "*How can you find out about and update your information?*" section of this Privacy Notice.

The right to object

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the "*right to be forgotten*".

There may be legal or other reasons why we need to keep or use your information, but please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your personal information. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

If you object to our processing of any of your personal information, you must make the request in writing addressed to the "*Data Protection Representative*" using one of the methods set out in the "*How can you find out about and update your information?*" section of this Privacy Notice.

Right to make a complaint

If you have any issues with our processing of your personal information and would like to make a complaint, you may contact the Information Commissioner's Office on 0303 123 1113 or at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Changes to our Privacy Notice

This Privacy Notice may be subject to changes. Any future changes or additions to the processing of personal data will be communicated to you through an appropriate channel depending on how we normally communicate with you.