

Appendix 2: Privacy Notice

AON RETIREMENT PLAN: PRIVACY NOTICE

Aon UK Trustees Limited (the “**Trustee**”) holds and uses personal information about Plan members and beneficiaries to run the Aon Retirement Plan (the “**Plan**”), in line with the 'data protection' laws in force at the time.

What we do with your information

The Trustee is a 'data controller'. This means the Trustee collects and uses your personal details to meet its legal duties, and for other legitimate purposes solely to do with running the Plan. These may include:

- calculating, managing and paying Plan benefits to you, or following your death;
- dealing with any queries, complaints or appeals about decisions we have made, for example about the Plan benefits you or your dependants are entitled to receive; and
- meeting legal requirements and best practice.

We have received much of the information we hold from the members themselves. You may have also given us details about your beneficiaries – that is, people who may be eligible to receive benefits after your death. We assume that you have your beneficiaries' consent to give us this information and that you will share this privacy notice with them.

However, in certain circumstances we also hold and use information provided by:

- Aon UK Limited and Aon Solutions UK Limited, the sponsoring employers of the Plan (the “**Plan Employers**”);
- other employers or pension schemes associated with the Plan Employers or the Plan;
- medical advisers;
- any pension scheme or arrangement where you had benefits which you then transferred to the Plan;
- HM Revenue & Customs;
- the Department for Work and Pensions;
- regulatory bodies (such as the Pensions Regulator); and
- tracing services.

The information we hold

The details about you that we use to help us calculate and pay your benefits include:

- full name, date of birth, National Insurance number (or any other official ID numbers);
- business and personal contact details, including address, telephone numbers and email addresses;
- financial information, including salary, pension or prospective pension entitlement and bank account details;
- employment details, including years of service, employment start and leave date;
- your pension benefit choices, including any you may make online through the Plan portal; and

- marital or relationship status, including your beneficiaries' full names, dates of birth, contact details and relationship to you.

We also hold and, in appropriate circumstances, use particularly 'sensitive' data about you – for example, to allow us to manage any ill-health or death benefits. We will normally process this information in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). We may also, generally when considering claims under the Plan's Internal Dispute Resolution Procedure, process any sensitive data for the purposes of establishing, exercising or defending legal claims. If we ask for your explicit consent to do this then you can withdraw this consent at any time.

Sharing your information

Where appropriate, we share your personal details with certain third parties involved in running the Plan, this includes:

- the Plan administrator (and its administration and website system providers who may hold some of those personal details centrally in respect of all accounts held with that provider);
- the Plan actuary and their support team;
- the Plan Employers and their advisers;
- buy-in providers and similar providers to assess future provision of benefits outside the Plan (including those with whom the Trustee has already secured certain benefits in the Plan), together with their reinsurers and third party administrators;
- other persons responsible for providing or communicating benefits, e.g. occupational health service providers.

We may also make information about you available to:

- any other companies associated with the Plan Employers – for example, to firms which may buy (or have already bought) part or all of the Plan Employer's business;
- the trustee, sponsoring employer, administrators or professional advisers of any pension scheme you may have transferred benefits to or from.

We can also share your personal information outside the Plan if you ask us to, or if we need to respond to or comply with a judicial proceeding, court order, request from the Pensions Regulator, Pensions Ombudsman or any other regulator or any other legal process served on or involving the Trustee.

In some situations, we share responsibility for your personal details with the Plan actuary, the legal advisers (who need information about you to carry out their professional duties to the Trustee), insurers and the auditors.

In turn, the Plan Employers use your details to meet their legal obligations as the sponsoring employers of the Plan. They have a legitimate interest in managing Plan costs and may want to offer certain options to members.

The Buy-in Providers process some members' data as a data controller to take steps necessary for the buy-in insurance policies and to provide data to their reinsurers, administer the buy-in policies and comply with applicable laws and regulations.

Please note that the Plan Employers, the Plan Administrator, the Buy-in Providers and other advisers receiving your personal details may sometimes pass information to other countries. When this happens, they must make sure that the party receiving the information has proper security measures in place including appropriate contractual arrangements.

Storing your personal data

Pension benefits are payable over a long period and your right to benefits from the Plan may depend on information going back many years. We keep the information we hold about you throughout your membership of the Plan. Once your membership ends, the Trustee will retain your details for a minimum of 7 years. We may hold information for longer if necessary to make sure the Plan pays the correct benefits and to deal with any queries about your benefits which may arise after that time.

Aon Solutions UK Limited, as the Plan Administrator, will hold on to your personal details for 7 years after the termination of the contract with us or for longer if necessary in order to protect themselves against any later legal claims.

Where the Buy-in Providers hold your personal data, they will retain this for as long as they consider necessary in order to comply with their legal and regulatory obligations and to protect themselves against any subsequent legal claims.

Your rights

You have the right to see the information we hold about you. You can ask us to correct any mistakes, or erase some or all of the details we have.

In some situations, you can ask us to limit the way we use your personal information, object to our using it at all, or request a copy of it to share elsewhere.

Where you have given us your consent to use particular information, you can withdraw that consent at any time. However, please bear in mind that if we do not hold all the details we need, we may not be able to pay out the benefits you are entitled to.

You may view the Aon Solutions UK Limited Privacy Notice online at <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>

Contact details

If you have any questions or want to know more about the information the Trustee holds and why, or about the Plan's 'data protection' arrangements, please contact George Cumner at:

Address: Aon Solutions UK Limited, Briarcliff House, Kingsmead, Farnborough, Hampshire, GU14 7TE

Email: george.cumner2@aon.com

Issues and complaints

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 use of your information is not in line 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 545 745

4 September 2025