

Privacy Notice

Data Protection - How we use information about you

The purpose of this notice is to help you understand how we collect and use your personal information, and what your rights are in respect of that information.

We, Electricity North West (ESPS) Pensions Trustees Limited, (the “Trustee”) of the Electricity North West Group of the ESPS (the “Group”) will use your personal details to assess, deal with, secure and pay any benefits you may be entitled to under the rules of the Group.

As part of the service we provide we hold certain personal information about Group members and, where applicable, their dependants and beneficiaries. We may share your information with other organisations for the purposes of identifying accurate information as to your whereabouts or for the purpose of paying any benefits that you may be entitled to. We will handle your data in compliance with all relevant data protection legislation, including UK GDPR and, if and to the extent applicable, the EU GDPR, together with any legislation and/or regulation implementing or made pursuant to them, or which amends, consolidates, replaces or re-enacts any of the same (including the Data Protection Act 2018). The Trustee of the Group is the data controller in respect of your personal information for the purposes of applicable data protection legislation.

Purpose of using information

We process information or data for the reasons/purposes above. This information may include:

- personal details (such as name, age, date of birth and gender);
- family, lifestyle and social circumstances;
- contact details (such as address, telephone number and email address);
- national insurance number;
- financial details, including details of your bank account and, if you agree to use an electronic identity verification service, data that allows us to perform a soft credit check (this would not affect your credit score);
- employment and education details;
- information about benefits under the Group, , including pensions and death benefits, together with corresponding details of assets, investments and insurance;
- goods or services provided;
- if you agree to use an electronic identity verification service, data that allows us to verify the personal details of members, dependants and beneficiaries;
- details about dependants and/or beneficiaries (including their names and possibly details of their gender), current relationship status, marital / relationship history;
- details about next of kin and emergency contact information;
- medical and other details about your health; and
- if a pensions dashboard has been used, an online platform where access to information about all of a persons pension benefits, a “pensions identifier”, which is a string of characters used to identify specific benefits under the Group.

Personal data relating to the Group is held on paper and on computer systems. As the “data controller”, the Trustee must process this information fairly and lawfully.

In order to properly administer the Group and to calculate and pay benefits, from time to time other information may need to be held

As part of running the Group, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as “special categories of personal data”). Under data protection legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as “special categories of personal data”. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

How we gather personal information

This information will generally be obtained directly from you or from your employer / ex-employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant’s benefit from the Group, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member’s death.

We will only collect and use your personal information where:

- there is a legal obligation for us to do so;
- it is for our legitimate business interests;
- to the extent required to comply with our duties in relation to individuals using pensions dashboards. This includes “matching”, where we use personal data that a user has provided to search our Group records to check whether that user is a member of the Group, and where we collect further personal data from that user in the event of a “possible match”; or
- you have given us your consent to do so.

Our legitimate business interests include fulfilling our role in dealing with, assessing eligibility for, securing and paying any benefits you may be entitled to. We will not use your data for our legitimate business interests if they are overridden by your interests, rights or freedoms.

We will not process personal information for any purpose or purposes which we have not told you about. However, there are exceptions to this. For example, if it were obvious to an individual that personal information would be processed for the new purpose or if the new purpose was in fact compatible with the original purpose(s) for which the personal information was collected.

You do not have to provide the information requested from you, but there may be a delay in the payment of your benefits if that information is not provided.

If we are processing your data on the basis of your consent you can withdraw your consent at any time by contacting Broadstone (details shown under further information). The withdrawal of consent will not affect the processing of personal data carried out before consent was withdrawn.

What else we do/might do with personal data

We may transfer, store, or process your personal data outside of the UK or EEA. Where this is the case, any transfer of Group personal data outside of the UK or EEA will comply with the requirements of data protection legislation. Such transfers will generally be made relying on UK adequacy regulations. Alternatively, they may be made using the UK’s International Data Transfer Agreement or, where relevant, using the UK Addendum to the European Commission’s standard contractual clauses, and where we

consider that the protection for the data subject's personal data would not be "materially lower" after the transfer. You can find copies of the Agreement and Addendum [here](#).

Who the information may be shared with

From time to time, we may need to share your information with other organisations. Where this is necessary we are required to comply with all aspects of relevant data protection legislation.

Your information will be shared with Broadstone in order for them to provide pension administration services in line with the reasons/purposes outlined above.

The types of other organisations we may need to share some of your information with are:

- claimants, beneficiaries, assignees and payees;
- current, past or future employers which may include group companies which are based outside the UK or EEA (as applicable). Where data is sent outside the UK or EEA (as applicable), appropriate safeguards are put in place to ensure that your data is kept secure;
- pension schemes with which the person whose personal information we are processing has an association;
- trade and business associates and professional advisers;
- persons in connection with any investment changes, sale, merger, acquisition, disposal, reorganisation or similar change involving the Group (including any counterparties, potential or actual purchaser and their advisers);
- healthcare, social and welfare organisations;
- financial organisations and advisers;
- central and local government ombudsmen and regulatory authorities;
- suppliers;
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement;
- family, associates or representatives of the person whose personal data we are processing;
- tracing agencies;
- service providers, including the service provider for electronic identity verification; and
- third parties that form part of the "dashboard ecosystem" that enables pensions dashboard services to work, as well as the Group's Integrated Service Provider (ISP), which provides a service allowing pensions information from the Group to be connected to the dashboard ecosystem.

The Group's actuary, auditor and (in certain circumstance) legal advisers are also data controllers in relation to your personal data. This means that they have to comply with the requirements of data protection legislation, as well as relevant industry codes and standards, when processing your personal data. For more information about what personal data they hold about you and how they use it, see below:

- Group actuary - a summary of how they treat your information is appended to this notice.
- Group legal advisers, Sackers & Partners LLP - see their [privacy notice for pension scheme members, beneficiaries and client's employees](#).

We may also share information with:

- insurers or re-insurers providing services for the purpose of liability and risk management exercises; and
- annuity providers for the purposes of providing you with an example annuity quote at retirement. In doing so, the Trustee may pass information that is deemed to fall under the “special categories of personal data” and will do so in reliance on a public policy condition in the Data Protection Act 2018. Please see the latest version of the Trustee’s Data Protection Policy at <https://www.enwlpensions.co.uk/support/privacy-and-data-protection> for further information.

Retention of data

One of the key principles of the relevant data protection legislation, is that the personal data we store and process shall be adequate, relevant and limited to what is necessary for the purpose it was originally collected. Our standard policy is for information or data to be kept for only as long as necessary. It is then disposed of in a managed and secure way. Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction. However, as pensions are a long term saving vehicle it may be necessary to retain your personal data for the remainder of your life and any dependants’ lives in order to pay you the benefits you are entitled to along with any dependant’s benefits payable.

Our core systems, data, and administration services are all carried out and stored within the UK.

Completing forms on behalf of a child

If you are completing forms, on behalf of a child we may also hold and use your personal information, which will be dealt with on the same basis as set out above.

Your rights

You will have a number of rights under data protection legislation. These include the right to:

- see the information we hold about you;
- request personal data to be amended if it is inaccurate or incomplete;
- request the deletion or removal of personal data where there is no compelling reason for its continued use, although the Trustee can override this request in certain circumstances;
- to block or restrict the processing of your personal data in certain circumstances;
- object to the processing of your personal data in certain circumstances;
- object to the use of electronic identity verification process to validate any application of retirement or transfer. If you wish to opt out of the electronic identity verification process, please contact Broadstone (details shown under further information); and
- complain to the Trustee, to the Information Commissioner’s Office, or to bring an action before the court, if your personal data rights are not complied with.

You should be aware that taking any of the above steps could impact the payment of your benefits, your participation in the Group, and/or our ability to answer questions relating to your benefits.

There is also a right under the GDPR to receive your personal data (in a structured, commonly used and machine-readable format) and to transfer your data to another service provider or data controller. This right applies where your data is being processed on the basis of your consent or in line with a contract to which you are party. Please note that for the majority of members, this is not applicable as we rely on our legitimate business interest to collect and process your data rather than individual consent or contracts.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Further information

If you wish to exercise any of your rights or have concerns about the processing of your personal data or, on behalf of the child in whose name this claim is made please contact the Trustees on the following details:

Electricity North West (ESPS) Pensions Trustees Limited
C/o Broadstone
2 Rye Hill Office Park
Birmingham Road
Coventry
CV5 9AB

Tel: 02476 472 580
Email: enw@broadstone.co.uk

If you believe we or Broadstone are processing your personal data in a way which is inconsistent with the law, you can complain to us by contacting the Group Secretary, currently Mr L Warwick or filling in our form [[link to complaints procedure](#)].

If you are not satisfied with our response to your complaint, you can complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113.

Updates to this notice

This notice is the latest version to take effect from June 2026. This notice will be updated from time to time and you can see the current version on the pensions website at www.enwlpensions.co.uk.

Alternatively, if you would prefer to receive a hard copy of the notice in the future, please contact the Pensions Team on the following details:

Tel: 0843 311 4530
Email: pensions@enwl.co.uk

Appendix A

Scheme Actuary - Aon Solutions UK Limited

“QUICK READ” Privacy Notice

Aon Solutions UK Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which they use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

Aon may pass your personal information to third parties such as financial advisors and benefits providers, insurers, their affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in their full Privacy Notice. We recommend that you review this notice which is available online at [UK Wealth Aon Solutions UK Limited](#), or you can request a copy by contacting Aon, including reference to the scheme name, at:

Data Protection Officer
Aon Solutions UK Limited (Retirement and Investment UK)
PO Box 730
Redhill
RH1 9FH

RI.UK.PrivacyChampions@aon.com