

PRIVACY NOTICE FOR THE: Cooper Consolidated Pension Plan, The MTL Instruments Group Pension Scheme, The Willsher and Quick Pension Scheme (the 'Schemes')

Ross Trustees Services Limited t/a Independent Governance Group (an independent professional trustee company) is the professional corporate sole trustee (the '**Trustee**') of the Cooper Consolidated Pension Plan, the MTL Instruments Group Pension Scheme, and the Willsher and Quick Pension Scheme (the '**Schemes**').

Ross Trustees Services Limited is a private company limited by guarantee, registered in England & Wales with company number 079044277. We are the controller of personal information related to your membership of the relevant Scheme(s).

This Privacy Notice explains how we, as the controller, collect, share and use that personal information in compliance with the UK data protection law, and how you can exercise your data protection rights.

Information we collect about you

You, and Eaton Corporation (the '**Company**') in its capacity as principal employer of the Schemes, have provided us, and may in future provide us, with information relating to your employment with the Company and your membership of the Schemes.

We hold the following information:

- personal details such as your name, date of birth, email and postal address (current and previous ones), mobile number, national insurance number;
- family details such as whether you are married or in a civil partnership, and details about your children, dependants and other family members;
- employment details such as the pensionable pay you received while in employment, any bonuses you received, and your length of service;
- pension data, such as your pension accrued to date or your pension in payment;
- special category personal data, such as personal information relating to physical or mental health or details of criminal offences, which may be relevant to the payment of benefits from the relevant Scheme(s);
- payment details of pensioner members: if you have already started receiving your pension we will hold information such as your bank account details and other data necessary for processing payments and fraud prevention.

Why and how we use your information

We use your personal information when it is necessary to ensure the effective, efficient and accurate management of the Schemes in accordance with the Schemes' Rules and the law. This includes using your information to enable us to calculate and pay the correct pension benefits during your lifetime and on your death. We may use your information to enable us to communicate with you.

The government has established pensions dashboards to allow individuals to securely access their pension information online in one place. By law, we must connect to this system, which requires preparing and matching member data to verify if an individual has a pension with us. If a match is found, relevant pension data will be shared with that individual. If there is only a possible match, further checks will be carried out. This process involves sharing your personal information (including name, date of birth, and address) with the Pensions Dashboards. In connection with the operation of the Pensions Dashboards, member data may also be shared with regulatory bodies like the Money and Pensions Service (MaPs), the Pensions Regulator and the Financial Conduct Authority.

In order to use your personal information, we must have a lawful basis for doing so. Mostly, the reason that we have for using your information is to enable us to carry out the role of Trustee of the Schemes (known as 'legitimate interest'). Without using your information, we could not operate the Schemes effectively. In some situations, we are required by law to use your information, for example in the context of the Pensions Dashboards Ecosystem pursuant to the Pensions Dashboards Regulations. These Regulations establish the Pensions Dashboards Ecosystem (PDE), i.e. a dedicated technical infrastructure that connects multiple parties and services and enables transmission of key information about the dashboard users' pension entitlements from pension schemes for viewing on the authorised pensions dashboards (Pensions Dashboards). Our processing of personal information in this context will be limited to preparing the data we hold in line with the Pensions Dashboards requirements and matching that data with the data provided via Pensions Dashboards, to verify if a Pensions Dashboard user has a pension with us. If a match is found, the relevant pension data will be shared for viewing on the Dashboard. If there is only a possible match, further checks will be carried out. This process involves us sharing certain personal data within the PDE (see more information below and under the heading **Who we share your information with**). We are not responsible for the processing of personal data by these parties acting as independent controllers. You can find more information about their processing and about the PDE [here.](#)

In limited circumstances we will only use your information where we have your consent to do so. If your consent is needed, and has not already been obtained, we will not use your information until we have sought and obtained your agreement.

The following table provides more details on our purposes for processing your personal data and the related legal bases.

Purpose/Activity	Type of personal information (as described above)	Lawful basis for processing
Communicate with you	Personal details	Our legitimate interests
Calculating and paying the correct pension benefits	Personal details	Our legitimate interests

<p>during your lifetime and on your death</p>	<p>Employment details</p> <p>Pension data</p>	
<p>Processing to enable the Scheme's connection to the PDE: preparing members' personal information to match their pensions with requests submitted via Pensions Dashboards.</p>	<p>Personal details (name, date of birth, current address, previous address, email address, mobile number, NIN) ("Find Data")</p> <p>Pension information that must be provided by the Scheme for viewing on the Pensions Dashboard: information about the user's pension entitlement such as details of Scheme membership and related employment, a description of accrued pensions (e.g. type, date payable) and projected pension values at retirement, where relevant ("View Data").</p>	<p>Legal obligation</p>
<p>Processing after the Scheme's connection to the PDE:</p> <ul style="list-style-type: none"> - to verify and match the Dashboard user to their pensions; and - to release key information about the user's pension entitlement for display on the Dashboard. 	<p>Find Data (as described above)</p> <p>View Data (as described above)</p> <p>Find Data (as described above)</p> <p>Pension identifier (PeIs) tokens (a</p>	<p>Legal obligation</p>

	unique identifier generated within the PDE for each separately identifiable matching pension in which the Dashboard user may have an interest)	
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Who we share your information with

We do not sell your personal information and we do not transfer it outside of the UK unless we fully comply with the requirements of data protection law and put appropriate safeguards in place. We only share your personal data with selected recipients and only where it is necessary to do so for the purposes set out above.

As at the date of this Privacy Notice, we share your information with the following third parties for the following reasons:

- The Schemes' Actuary is an independent data controller with the Trustee when providing certain actuarial and consultancy services. For more information on how the actuary uses your data, you can contact them using the details on Schedule 1.
- The Schemes' administrator to enable it to provide administration, pension payroll, consultancy and investment services to the Schemes. Further information can be found in Schedule 1
- The Schemes' auditor, to enable it to complete the audit of a Scheme's Annual Report and Accounts. More information can be found at Schedule 1
- The Schemes' legal adviser, to provide legal advice to the Schemes. More information can be found at Schedule 1
- we share the following personal data in the context of the Pensions Dashboards Ecosystem:
 - PeIs tokens with the Money and Pensions Service (MaPS); .
 - PeIs tokens and View Data with the relevant Pensions Dashboards service providers for display on the relevant Dashboard;
 - our integrated service provider (ISP) processes personal data on our instructions (as our processor), only as necessary to facilitate connection to the Pensions Dashboard Ecosystem and data transmission. More information can be found in Schedule 1.
- regulatory bodies such the Pensions Regulator, the Financial Conduct Authority, and MaPs, only when requested, and only as necessary to support their specific regulatory functions.

We may also seek to share your data with insurance companies for the purposes of securing benefits where appropriate, and your data would be shared on an anonymised basis wherever possible.

Whenever we share your information with a third party, that party is required to enter into a binding agreement that they will use your information only for the purposes for which it is provided, in full compliance with data protection law, and that they will not pass it on to any other person.

In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, local or foreign regulators or to judicial or administrative authorities) or where disclosure is both legally permissible and necessary to protect or defend our rights or protect your rights.

Any personal information held by us and any third-party will be treated as confidential.

Keeping your information secure

The security of your personal information is important to us. We take all steps reasonably necessary to ensure that your personal information is kept safe and secure in accordance with data protection laws. We take appropriate measures to protect your personal information against loss, theft, and unauthorised access, use or disclosure.

At present, we do not transfer your personal data outside the UK but if this changes in the future, we will update this privacy notice and appropriate safeguards will be put in place.

How long we keep your information

We only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any pension scheme requirements and, where required for the Schemes to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled. As an example, pension benefits build up and are paid over a long period. We will therefore need to retain your details until at least 6 years after the final benefits are paid in respect of you. If a spouse's or dependant's pension is payable on your death, this may mean that we keep your personal information for some time even after you have died.

We will not keep information longer than it is needed. Once we no longer have lawful basis to retain it, we will securely destroy it.

Your rights regarding your information

Under data protection laws you have increased rights in relation to your personal information.

You have the right to access information that we hold about you, and to obtain certain information about how we use your information and who we share it with. In some situations, we may be exempted from providing this information, for example if doing so would reveal personal information about another person.

You have the right to have any errors in the information held about you corrected. If you wish to request a correction, please explain in detail why you believe the personal information we hold is inaccurate or incomplete.

You also have certain additional rights, for example to have your personal information permanently deleted, to request that we stop processing your personal information, and to request that we transfer your personal information to another party. If the reason why we are able to process your personal information is because you have given consent for us to do so, you may withdraw that consent at any time.

If you would like to exercise any of these rights, please contact us using the contact details at the end of this Privacy Notice. Please note that we will need to verify your identity before we can respond to your request.

Complaints

You also have a right to make a complaint about how we use your personal information. Please contact us using the contact details below and we will do our best to resolve the matter to your satisfaction.

This does not affect your legal right to complain to the Information Commissioner's Office, which is the UK data protection supervisory authority. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline (0303 123 1113).

Contact us

If you have any questions, comments or requests regarding this Privacy Notice or use of your personal information, please get in touch with the Schemes' administrators:

Address:
Barnett Waddingham
Royal Liver Building
Pier Head
Liverpool, L3 1HU
United Kingdom

Email: Eaton@barnett-waddingham.co.uk
Telephone: 0333 1111 222

Schedule 1 – List of Advisers

Actuary	Company - Barnett Waddingham LLP Please see the name of the Schemes' Actuary at https://cplpensions.co.uk/documents/ Email address – Eaton@Barnett-Waddingham.co.uk
Administrator	Company - Barnett Waddingham LLP Email address – Eaton@Barnett-Waddingham.co.uk
Auditor	Company – Assure UK Name of contact – Jade Brooker Email address – jade.brooker@assureuk.co.uk
Legal Advisers	Company – Fieldfisher LLP Name of contact – Jeremy Harris Email address - jeremy.harris@fieldfisher.com
Pensions Dashboard ISP Provider <i>Only applicable for the Cooper Consolidated Pension Plan and The MTL Instruments Group Pension Scheme</i>	Company - Equisoft Limited Name of contact – Lyndsey Henderson Email address - Lyndsey.Henderson@equisoft.com