



Privacy Statement

Privacy and the Use of Your Data

The Trustee of the Pension Fund and its administrators (this is Capita in respect of the Dow Services Section and Aon Hewitt in respect of the DCL Section) (hereinafter: "we") need Personal Data from you in order to be able to execute and administer your pension in accordance with our legal obligations. These data include your home address, salary and marital status.

The Trustee is the data controller of the Personal Data to which this statement relates and we can be contacted using the details set out below. We process your Personal Data; we collect, use and store them. We do this in accordance with the law, the General Data Protection Regulation (GDPR) and applicable data protection laws of the UK. The corresponding procedures are explained below.

This is for information only – you do not have to take any action in response to this information.

Whose Personal Data do we Process?

We process Personal Data of:

- all participants (and other claimants and beneficiaries) in the Pension Fund;
- all visitors to the website;
- everyone who contacts us.

Who provides us with Personal Data and how do we receive these data?

- you, for instance when you join the Pension Fund or send an e-mail, call, complete a contact form or visit the website;
- your employer, for instance your salary details and your part-time percentage. We receive all (Personal) Data that are necessary for the proper execution and administration of your pension. Your (Personal) Data are delivered via a secure connection in a protected environment;
- (semi-) government agencies, for example HMRC; and
- Other pension schemes, independent financial advisers, medical practitioners and other advisors or service providers.

Which Personal Data do we Process?

We process at least the following Personal Data of all participants in the Pension Fund:

- Your full name, address and contact details
- Your date of birth
- Your sex/gender
- Your marital (or relationship) status
- Your benefit entitlement under the Scheme
- Information about your health
- National Insurance Number and/or other evidence of identity
- Details of your salary and other forms of remuneration
- Details of your bank account
- Details of any nominees to be considered for benefits in the event of your death.



For What Purposes and Based on What Do We Process Personal Data?

We process your Personal Data in order to be able to execute and administer your pension in accordance with our legal obligations. The authority to process Personal Data requires a basis. For the processing of your Personal Data by us, these are the bases:

- Legal obligations. For instance, obligations to pay benefits to you and other beneficiaries in connection with members' employment under the pension scheme rules and overriding legislation.
- A legitimate interest (for instance, to ensure the performance of day-to-day operations or daily management of the Pension Fund and to help us review and manage financial matters relating to the Pension Fund);

In addition, your Personal Data may occasionally be processed based on:

- your express consent;
- the implementation of/compliance with (contractual) obligations/agreements.

Who Do We Provide Personal Data To?

If necessary, your Personal Data will be provided to various recipients. Where required to do so, we conclude a Data Processing Agreement with these recipients. The Data Processing Agreement allows us to ensure these recipients observe due care and confidentiality when processing your data and keep them safe. Who receives which Personal Data depends on the situation. This may involve:

- the Trustee's actuarial, financial and other professional advisers.
- providers of administration and communication services
- regulatory authorities, HMRC, the Pensions Regulator
- insurers, AVC providers, annuity brokers
- any other third parties with whom we are authorised by law to share personal data.

We will also share personal information with the actuary to the Pension Fund. The actuary to the Pension Fund is a joint data controller with the Trustee when using Personal Data held in respect of you for the purposes of assessing, with the Trustee, financial matters affecting the Pension Fund. The current actuary to the Pension Fund is: Stephen Ellis, whose address is: Towers Watson Limited, The Colmore Building, 20 Colmore Circus, Queensway, Birmingham B4 6AT. Further details relating to how the actuary and Towers Watson Limited use your personal information can be found here: www.willistowerswatson.com/personal-data.

The Protection of Your Personal Data

Your Personal Data must be properly protected. This is very important to us, the Trustee, and its administrators. Therefore, we take technical and organisational measures to protect your Personal Data. These measures include measures against (cyber) crime, destruction, loss or other unlawful processing of your data. The measures taken meet at least the general requirements that are imposed on information security. We periodically evaluate the measures taken and adjust them if necessary.

Furthermore, we have made agreements both internally and with external parties about the confidentiality and security of your Personal Data.

Processing outside the European Economic Area (EEA)

Only in exceptional cases it can happen that your Personal Data are processed by an organisation in a country outside the EEA (for example, this may happen if computer servers used by our providers are located in a country outside the EEA). In that case, appropriate additional measures will be taken at all times that comply with the European standards for the protection of Personal Data based on the



GDPR. This means that either (i) the country has been confirmed by the European Commission to provide adequate protection for Personal Data or (ii) the entity receiving Personal Data has entered into a written contract which requires it to provide all protections to your Personal Data required by data protection legislation.

Further information about transfers of Personal Data outside the EEA can be detailed by contacting us at the address below.

Your Rights

By law, you have rights that you can exercise against organisations that process your Personal Data:

- Right of access by the data subject;
- Right to rectification;
- Right to erasure ('right to be forgotten');
- Right to restriction of processing;
- Right to data portability;
- Right to object.

You are entitled to exercise these rights but this is subject to certain restrictions under data protection legislation. If you would like to exercise your rights please contact us. Always submit the exercise of your rights in writing. You will always receive an answer from us.

When can you exercise your rights? By way of example, if:

- you want to know which Personal Data of you we possess, you can exercise your right to access;
- you believe that we have not correctly managed certain Personal Data of you, or that Personal Data must be changed or supplemented, you can exercise your right to rectification.

Filing a Complaint

You can file a complaint about the processing of your Personal Data. If you wish to file a complaint, contact us and always submit your complaint in writing. You will always receive an answer from us.

If in your opinion, we do not handle your data with due care and confidentiality, you can also submit a complaint to the Information Commissioners office (www.ico.org.uk).

Withdrawal of Granted Permission

If we process your Personal Data based on your consent, you can always revoke this consent. You can do this by following the same procedure as when you granted the permission. We will then stop the processing of your data as quickly as possible.

Retention Period for Personal Data

We process your Personal Data with the purpose of executing and administering your pension in accordance with our legal obligations. Given the long term nature of the Pension Fund, we will need to keep your Personal Data for as long as is reasonably necessary to determine members' entitlement to benefits from the Pension Fund and to comply with our legal obligations in relation to the administration of the Pension Fund. In the event where we dispose of Personal Data it will be done in a secure way.

Cookies

This website uses cookies. There are different types of cookies. Functional cookies are cookies necessary to ensure the proper functioning of the website of the Pension Fund. We always store these cookies on your device and they have no impact on your privacy. For cookies that do affect your



privacy, such as analysing cookies, we ask for your permission as soon as you visit the website of the Pension Fund. For more information, please read the cookie statement.

Contact

Do you have a question about the processing of your Personal Data? Do not hesitate to contact us as follows:

Dow Section: please email fpensuk@dow.com

Segregated DCL Section: please write to: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH

Changes

The Trustee reserves the right to change this Privacy Statement. We recommend you to read the Privacy Statement regularly. The Privacy Statement was drawn up on 5 July 2018. You can always find the most recent version at the following websites:

Dow Section: www.hartlinkonline.co.uk/mydowpension and www.mydowpension.co.uk

Segregated DCL Section: www.mypensiononline.com/dowcorning