

Anglo UK Pension Scheme (“the Scheme”)

Our Privacy Notice – How we use your personal information

As required by the UK data protection regime (comprising the UK GDPR and the Data Protection Act 2018), we make this privacy notice available to help you understand how we collect, store and use your personal information as a member of the Scheme.

1. Introduction

Anglo UK Pension Trustee Limited, as Trustee of the above Scheme (the “Trustee” or “we” or “us”), collects and uses your personal information in order to administer the Scheme and to pay benefits due to Scheme members and other beneficiaries.

The Trustee is committed to protecting your personal information. This privacy notice tells you more about when, from whom and why the Trustee collects your personal information and how we use it.

The Trustee is the controller of the personal information to which this notice relates; we can be contacted using the details in section 14.

2. Personal information that we collect

The types of personal information that we may collect and use include:

- Your full name, title, address and contact details (such as your telephone number and email address);
- Your date of birth;
- Your sex/gender;
- Your marital (or relationship) status;
- Your employment-related information including name of employer;
- Your employment service including start and, where applicable, end date;
- Your Scheme retirement date and age;
- Type of pension and your benefit entitlement under the Scheme;
- Your National Insurance number;
- Your unique employment references (e.g. payroll number);
- Your tax status/code details;
- Your investment choices;
- Details of your regular earnings (including salary details) 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 and any other expression of wishes; and
- The identity of other beneficiaries such as dependants and next of kin.

3. Sensitive personal information that we collect

We usually only ask for sensitive personal information (often referred to as 'special categories of personal data') when it is required to help us make a decision in relation to your rights under the Scheme. For example, we may request:

- Information about your health – we may ask you to provide health information (which may be contained in medical records and/or a doctor's opinion) if you request payment of a benefit that can only be paid, or continue to be paid, from the Scheme if you meet certain medical criteria (e.g. ill-health early retirement benefits). In addition to receiving this information from you, we may receive medical information from third parties such as your doctor or a third-party occupational health provider; or
- other sensitive personal information – we may ask you to provide other sensitive personal information (e.g. information about your personal relationships) if it is relevant to the Trustee's decision-making processes.

In addition, certain categories of sensitive personal information (e.g. race, ethnicity, religious beliefs and sexual orientation) may be revealed on formal documentation that we process in order to identify the recipients of benefits under the Scheme and determine the status of your relationship (e.g. birth certificates, marriage certificates, decrees nisi/absolute, death certificates, driving licenses and passports). You may also provide us with sensitive personal information voluntarily (e.g. when raising queries or making a complaint).

4. Where does your personal information come from?

Most of the personal information that we hold about you is provided by you when you joined the Scheme or when you contact the Trustee (or organisations appointed by the Trustee to help with the running of the Scheme) about your benefits.

Other information about you may be provided by current or former employers participating in the Scheme, other pension schemes and pension providers, independent financial advisers, medical practitioners, other third-party advisers or service providers to the Trustee and His Majesty's Revenue and Customs (HMRC).

5. Why do we process your personal information?

We use your personal information for a number of purposes and legal grounds, many of which are summarised in the table below. For more information about the legal grounds relied upon, please see the section "*What are our legal ground(s) for processing?*" below.

CATEGORY OF PERSONAL INFORMATION	WHAT WE USE THIS INFORMATION FOR	LEGAL GROUND(S) FOR PROCESSING
Address Telephone Number Email Address	We use this information so that we can send you information that we are legally required to provide you with. In addition, we use this information to get in touch with you when we need to in order to run the Scheme. Finally, we use it to send you information that we think will be relevant to you as a member of the Scheme.	<p>We are subject to numerous laws, rules, regulations, regulatory guidance and fiduciary duties in our role as a Trustee.</p> <p>These include the following legal obligations:</p> <p>We have a legal obligation to send certain information to members of the Scheme (including benefit statements).</p> <p>We have a legal obligation to pay the correct level of benefits to the correct individuals. This requires us to obtain and update this information.</p> <p>We also have a legal obligation to properly identify individuals who receive or may receive benefits from the Scheme.</p> <p>The Trustee is also required to comply with tax legislation and deduct the correct level of tax from benefits.</p> <p>We may also process your</p>
Name and title Date of birth Scheme retirement date Gender	We use this information to identify you and to create and update your membership record in the Scheme.	
Marital status Dependants Next of kin	We use this information to help us decide who should receive what benefits from the Scheme and to be able to more accurately cost the running of the Scheme.	
National Insurance number Employment start and, if applicable, end dates Payroll number Scheme reference number	We use this information to identify you and to create and update your membership record in the Scheme. Your National Insurance number is also needed so that we can receive the correct information from HMRC and so that we can deduct the correct level of tax from your benefits.	
Bank account details	We use this information in order to pay your benefits under the Scheme directly to you.	
Tax code/status	We use this information to deduct the	

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Earnings	correct level of tax from your benefits. We use this information to calculate the correct level of your benefits under the Scheme.	personal information in order to fulfil our legitimate interests in running, administering and managing the Scheme and discharging our fiduciary duties. We may also need to use your personal information in order to exercise a legal right, defend a claim or seek legal advice.
Details about your benefits entitlement under the Scheme	We use this information to calculate the correct level of your benefits under the Scheme in accordance with the Scheme rules, overriding legislation and in accordance with regulatory guidance. We also need this information to be able to accurately cost the running of the Scheme.	
A combination of the above categories of personal information	We use this information to share: <ul style="list-style-type: none"> • information with the sponsoring employer; • information with professional advisers or other service providers in order to obtain professional advice or receive a service; and • With government, ombudsman, regulatory and tax bodies as required. 	
Investment choices	We use this information to ensure that your additional voluntary contributions and/or money purchase benefits are invested in the correct investment fund.	We have a legal obligation to ensure that the Scheme is run properly and in line with its governing documents.
Information contained in death benefit nomination forms	We use this information as part of our decision-making process when deciding who will receive death benefits.	As Trustee of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time.
Information about your personal relationships	This information is used to determine who is entitled to benefits in relation to your membership of the Scheme.	
Certified copies of official documents, including: <ul style="list-style-type: none"> • passport; • driving license; • birth certificate; • marriage certificate • death certificate; and • decrees nisi / absolute. 	This information is used to: <ul style="list-style-type: none"> • identify you; • determine the status of your relationship; • determine who may be entitled to benefits under the Scheme; and • trigger certain processes in respect of your benefits under the Scheme (e.g. payment of death benefits or splitting of benefits in cases of divorce). 	
Special categories of personal data (such as health data contained in	This information is used to (amongst others): <ul style="list-style-type: none"> • keep accurate and up to date 	In certain circumstances, we may process your sensitive information (such as your medical records)

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medical records and doctors' opinions)	<p>records in relation to members and beneficiaries;</p> <ul style="list-style-type: none"> • provide benefits in accordance with the Scheme's governing documentation; • enable the Trustee to make properly and informed decisions in relation to a member, beneficiary, or potential beneficiary's eligibility for benefits or when responding to complaints or enquiries; • inform our decision making process when deciding ill health benefits under the Scheme; and • provide information to medical practitioners for ill health benefit or eligibility decisions. 	<p>where it is necessary to comply with employment, social security and social protection purposes, where the processing is in substantial public interest or with your explicit consent.</p>

6. What are our legal grounds for processing your personal information?

(a) In order to comply with our legal obligations

The legal basis for us using your personal information is to enable us to comply with our legal obligations as Trustee of the Scheme, in order to comply with pensions and relevant legislation, the Scheme's Rules, court rulings and Pensions Ombudsman decisions. For example:

- legislation sets out certain things the Trustee must do (e.g. sending certain information to the Scheme's members); and
- the Trustee is subject to fiduciary duties under trust law to act in line with the Scheme's governing documentation.

It is necessary for us to process your personal information in order to comply with these legal obligations.

(b) In order to fulfil our legitimate interests

Processing your personal information is also lawful if it is based on our 'legitimate interests'. The Trustee has a legitimate interest in running and managing the Scheme and managing the Scheme's risks and liabilities. In addition, certain third parties may have legitimate interests which require the processing of your personal information by the Trustee (e.g. your employer may need information in order to comply with regulatory requirements).

In order to rely on this legal ground, we have:

- considered the impact the processing has on your interests and rights; and
- implemented appropriate safeguards to ensure that your privacy is protected as far as possible.

(c) What are our specific legal grounds for processing your sensitive personal information?

There are three specific legal grounds that allow us to process your sensitive personal information (sometimes referred to as special categories of personal information):

- when we obtain **explicit consent** from you (e.g. when you sign one of the Scheme's forms which contains the appropriate consent wording);
- when processing is **necessary** for carrying out obligations under employment, social security or social protection law. This includes obligations under pensions law; and

- when processing is **necessary** for reasons of substantial public interest (which, under the Data Protection Act 2018, applies to certain processing by trustees of occupational pension schemes when making decisions about benefits).

7. What would happen if we did not collect and process your personal information?

If we did not collect and process your personal information then:

- we would not be able to manage or administer the Scheme appropriately;
- we would not be able to pay the benefits that you are entitled to under the Scheme; and
- we would be in breach of our legal and regulatory duties.

8. Sharing your personal information with other parties

Where the Trustee considers it necessary for the purposes explained in section 5, your personal information may be shared with selected third parties, such as the Trustee's actuarial and financial advisers and other professional services providers, including those who provide data processing, administration and communication services to the Scheme. The Trustee may also share personal information with regulatory authorities and healthcare practitioners, insurers, AVC providers, financial advisers, annuity brokers, employers participating in the Scheme, HMRC, the Pensions Regulator and any other third parties with whom we are authorised or required by law to share personal information.

In an appendix to this privacy notice we have set out a list of the third parties with whom we share your personal information with.

9. Transfers outside the EU

Some of the third parties with whom your personal information is shared may be located outside the United Kingdom ("UK") (for example, this may happen if computer servers used by our providers are located or backed up in a country outside the UK).

Under data protection legislation, we can allow your personal information to be transferred outside of the UK if:

- The country to which your personal information is being transferred has been confirmed by the UK Secretary of State to provide adequate protection for personal information; or
- The entity that is holding your personal information has entered into a written contract which requires it to provide all of the protections to your personal information required by the data protection legislation to which the data controller is subject.

Further information about transfers of personal data outside the UK, and copies of the appropriate or suitable safeguards in respect of third country transfers, can be obtained by contacting us at the address shown in section 14.

10. How long do we keep your personal information for?

The Scheme was set up to provide benefits over a very long time period. The Trustee needs to maintain records in order to properly run the Scheme, to determine who should receive what level of benefits and when they should receive them, and to respond to any disputes about an individual's rights under the Scheme.

As a result, the Trustee will generally keep your personal information for up to the lifetime of the Scheme plus 15 years (the longest period of time that someone can bring a claim against the Scheme). Our service providers (and former service providers) may also have similar valid grounds to keep your personal information for such long periods.

11. Accessing and updating your personal information.

Data protection legislation gives individuals the following rights in relation to personal information held about them:

- Individuals can ask what personal information is held about them and be provided with a copy;
- If personal information held about an individual is incorrect, he or she can ask for it to be corrected;
- Individuals can ask for personal information held about them to be deleted or for processing of that personal information to cease or be restricted in certain circumstances, for example, where that information is no longer needed;

- Individuals can request that certain types of personal information held about them is sent to them, or another organisation, in a format that can be read by computer;
- Individuals have a right to object to us processing their personal information;
- Individuals can withdraw their consent to how their personal information is being processed, where that processing is based on their consent. However, as highlighted above, the Trustee only requests sensitive personal data that is required to make decisions in respect of specific member benefits or complaints. If you withdraw your consent for us to process this information, we may have to delay or even stop payments / requests until we have sufficient information.

Exercising these rights is subject to certain restrictions under data protection legislation. For further information about these rights, or to make an application to exercise your rights, you should write to us using the contact details shown in section 14.

12. Complaints

If you are unhappy at any stage about how the Trustee is using your personal information, you have the right to lodge a complaint with The Information Commissioner's Office in the UK (www.ico.org.uk).

13. Changes to our privacy notice

This privacy notice is subject to regular review and may be updated from time to time. We will tell you if we make any changes to how we use your personal information.

14. Contact us

If you have any questions about how your personal information is used, including in relation to the arrangements we have in place with the Scheme Actuary, please feel free to contact us at the following address:

Andrew Halliday
Secretary to the Trustee
Anglo UK Pension Trustee Limited
c/o Anglo American Services (UK) Ltd
17 Charterhouse Street
London
EC1N 6RA

This Privacy Notice was formally approved by Anglo UK Pension Trustee Limited, as Trustee of the Anglo UK Pension Scheme, on 10 June 2025

Appendix

ROLE	THIRD PARTY	USE OF PERSONAL DATA	OTHER INFORMATION (IF APPLICABLE AND/OR REQUIRED)
Actuary	Iain Turri, Aon	Aon and the Scheme's named actuary for statutory purposes use personal data in order to provide advice to the Trustee and to perform actuarial calculations. The Scheme's actuary has to use personal data in order to fulfil certain statutory duties, for example, relating to the formal Scheme valuations.	<p>Aon also uses the Scheme's personal data for data analytics purposes, including to create insights, reports and other analytics to improve the quality of and market Aon's advice, products and services.</p> <p>The Trustee is satisfied that this is a reasonable use for the Scheme's personal data because the Trustee benefits from it. The research, information and analysis is made available to those at Mercer who advise the Trustee so that it can be used to improve and extend the services available to the Trustee. Some of the information may be available to the Trustee directly and helps inform it of pension industry knowledge. Aon has confirmed to us that none of its data analysis output discloses individual details of the Scheme's members or other beneficiaries.</p>
Administrator	Capita	The Scheme's Administrator uses personal data in order to run the Scheme and pay benefits to members and other beneficiaries.	
Legal advisers	Sackers	The Scheme's lawyer uses personal data in order to provide legal advice to the Trustee.	
Auditor	RSM	The Scheme's auditor uses personal data as part of its work auditing the Scheme's financial records and accounts.	
AVC Providers	Zurich, Aviva, Utmost Life & Pensions, and Prudential	The Scheme's AVC providers use personal data to manage members' AVCs.	
Risk transfer provider	Mercer	Mercer has been appointed by the Trustee as its risk transfer provider, primarily to carry out a broking exercise for a bulk annuity. Mercer use personal data for this purpose and expect to share personal data with quoting insurance companies.	

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Buy-in provider	Legal & General	Legal & General have been appointed by the Trustee as its buy-in provider. Legal & General will take full responsibility for the future benefit payments under the Scheme so will use personal data in order to pay the Trustee the sums needed to cover benefits to members and other beneficiaries.	