

THUS Group plc Pension Scheme

Scheme Privacy Notice

Who we are

We are the trustees ("**Trustees**", "**we**", "**us**" or "**our**") of the THUS Group plc Pension Scheme (the "**Scheme**").

As the trustees responsible for the running of the Scheme, we process personal data of members of the Scheme ("**Members**"), individuals who receive benefits from the Scheme ("**Dependants**") and other individuals who make communications, enquiries or claims to us in relation to the Scheme ("**Related Individuals**") (collectively "**you**"). Where we refer to "personal data" we mean any information relating to an identified or an identifiable individual, as defined in the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018 (referred to as the "**Data Protection Laws**").

The Trustees are a "controller" of your personal data, and we are committed to protecting your personal data in compliance with the Data Protection Laws. This "Privacy Notice" explains what personal data we hold about you, how we collect it, the reasons we use it, the organisations with whom we share it, how we protect it and what your rights are.

If you wish to contact us in relation to this Privacy Notice and/or our processing of your personal data, please use the details set out in the section "How to contact us".

What personal data we collect and how

Due to the nature of our role as trustees, we process a range of personal data about you to carry out the purposes outlined later in this Privacy Notice. Not all data listed below will apply to everyone (e.g. Membership and Employment Data will only apply to Members).

The personal data we process includes the following:

- **Membership and Employment Data:** dates of joining and leaving employment, periods of pensionable service, length of service, absence record, job title and job responsibilities, earnings, contributions and details of benefits.
- **Basic Personal Details:** name, date of birth, gender, age, contact details (e.g. home address, telephone numbers and email address) and identifiers such as your National Insurance Number, pension or member reference number and employee number (where applicable).
- **Financial Data:** bank sort code and account number, tax code, any other income, other pension arrangements, and any financial protections relating to your pension arrangements.
- **Identification Data:** birth, marriage, civil partnership and death certificates, and pension sharing or earmarking orders.
- **Family Data:** current marriage or civil partnership, and any previous relationships and dependants, death benefit nomination forms and potential beneficiary information.
- **Communications:** records of communication exchanged between you and us.

As part of running the Scheme, from time to time we also need to process and hold “sensitive” or “special” categories of personal data under the Data Protection Laws. This includes personal data regarding your physical and mental health. We will only use this personal data where you have explicitly consented to this or where there is an alternative legal basis for processing this information under the Data Protection Laws. If we need your consent to process such personal data, we will ask you to provide it at the relevant time. If you do not consent to our processing of this information when asked to do so, it may mean we are unable to pay benefits to you. Please note that you can withdraw your consent at any time by contacting us using the details in the section “How to Contact Us”.

Most of your personal data is provided to us directly from you. There are instances where the Trustees collect your personal data from Vodafone Limited (“**Vodafone**”), as principal employer of the Scheme, and other participating employers of the Scheme. This includes information relating to your employment, your salary and your benefits which is relevant to your pension and related benefit entitlements. From time to time, the Trustees may collect your personal data from other third parties as well, such as regulatory authorities.

Purposes for which the Trustees will process your personal data

The Trustees will process your personal data for the following purposes:

Processing activity	Types of personal data	Lawful bases of processing
<u>Administering the Scheme</u> We will use your personal data to administer the Scheme including: <ul style="list-style-type: none"> To calculate and pay benefits To provide you with the information, benefits and service that you request from us or that we are required to provide For statistical, financial modelling, funding, accounting and reference purposes For risk management purposes, including the insurance or manage of risks or of the Scheme’s benefits 	<u>Standard personal data</u> <ul style="list-style-type: none"> Membership and Employment Data Basic Personal Details Financial Data Identification Data Family Data Communications <u>Special categories of personal data</u> <ul style="list-style-type: none"> Medical Information 	<u>Standard personal data</u> <ul style="list-style-type: none"> Legitimate interests Necessary for compliance with a legal obligation <u>Special categories of personal data</u> <ul style="list-style-type: none"> Consent Necessary for legal claims
<u>Comply with regulatory requirements</u> <ul style="list-style-type: none"> We process your personal information to comply with our legal obligations 	<u>Standard personal data</u> <ul style="list-style-type: none"> Membership and Employment Data Basic Personal Details Financial Data Identification Data Family Data Communications 	<u>Standard personal data</u> <ul style="list-style-type: none"> Necessary for compliance with a legal obligation <u>Special categories of personal data</u> <ul style="list-style-type: none"> Necessary for the obligations and

Processing activity	Types of personal data	Lawful bases of processing
	<u>Special categories of personal data</u> <ul style="list-style-type: none"> Medical Information 	<ul style="list-style-type: none"> exercising specific rights of the controller or of the data subject in the field of employment and social security Necessary for Legal Claims

How we lawfully process your personal data

We are allowed to process your personal data for the lawful bases (as defined in the Data Protection Laws) as set out in the table above. Please see a further explanation on the lawful bases of processing below:

- *Legitimate Interests:* We are permitted to process your personal data if it is based on our “legitimate interests”, that is we have good, sensible, practical reasons for processing your personal data which is in our interest. These interests are effectively the purposes of our processing your personal data set out in the section “Purposes for which the Trustees will process your personal data”.

For example, we have legitimate interests to collect and process your personal data to administer the Scheme and provide benefits for you and your dependants. To rely on this lawful basis, we have considered the impact on your interests and rights, and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. You can object to the processing of your personal data that relies on legitimate interests. Please refer to the section “Your rights over your personal data” for more detail.

- *Consent:* Sometimes we want to use your personal data in a way that is optional for you. For example, we need to process personal data relating to your physical or mental health if you are applying for a pension on grounds of ill health. We will ask for your explicit consent to this unless there is an alternative legal basis for processing this information under the Data Protection Laws. Once you have given your consent, you can withdraw it at any time by writing to us using the contact details below.
- *Necessary for compliance with a legal obligation:* We rely on this lawful basis where we are required to comply with a legal obligation.
- *Necessary for legal claims:* We can process special categories of personal data and criminal offence related information if the processing is necessary for the establishment, exercise or defence of legal claims.
- *Necessary for the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security:* We rely on this lawful basis where we are required to comply with our regulatory obligations.

Retention of your personal data

We retain your personal data in accordance with our data retention policy. The standard retention period that we apply to your personal data is 15 years from the cessation of the Scheme. This is based on the

need for us to retain your personal data for as long as reasonably necessary to fulfil the purposes of processing as explained in this Privacy Notice such as managing the Scheme and satisfying any legal, accounting, tax, regulatory or reporting requirements.

Who do we share your personal data with

Where appropriate for the purposes of administering the Scheme, we may share your information with:

- the Scheme's administrator and consultant, which are currently Aon Solutions UK Limited and Aon Investments Limited;
- the Scheme's professional advisers and auditor. This includes the Scheme actuary (who is currently Stuart Cook) and their employer Willis Towers Watson, the firm that provides actuarial, and investment advice to the Trustees. It also includes the Scheme's legal adviser, which is currently Pinsent Masons LLP, and auditor, which is currently Grant Thornton UK LLP;
- the Scheme's insurers and annuity providers (and other insurers or brokers for the purpose of obtaining quotations relating to the Scheme or its benefits), investment managers, banks and other service providers;
- any financial adviser or other organisation appointed by the Trustees or Vodafone to advise you about your options under the Scheme or any adviser appointed by you where you have asked us to provide them with details of your benefits under the Scheme;
- any other person who is authorised to act on your behalf;
- companies within the Vodafone group and their professional advisers;
- regulators, government departments, law enforcement authorities, tax authorities and insurance companies;
- any relevant ombudsman, dispute resolution body or the courts; and
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in the Vodafone group business.

The entities listed above may also share personal data with their own business suppliers, for example in relation to the operation of IT systems or where they outsource part of their services.

Some of these entities may also be data controllers under the Data Protection Laws. However, in the first instance you should contact the Trustees using the contact details below if you have any queries about how they use your personal information.

Please note that some of the Scheme's former service providers may continue to hold information about you for their own record keeping purposes once they have ceased to be involved with the Scheme.

International transfers of personal data outside the UK

The data that we collect from you will usually be stored inside the UK.

However, we may transfer your personal data outside the UK if, for example, you are resident in a country outside the UK and we are required to send your personal data to a recipient (other than

yourself) in that location, or to obtain services from our external service providers. For all international transfer of data, we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this Privacy Notice and in accordance with the Data Protection Laws. Safeguards that we implement include applicable standard contractual clauses approved by the UK Secretary of State or other applicable contractual measures to ensure that your personal data is sufficiently protected outside of the United Kingdom.

Security of your personal data

We use appropriate technical and organisational measures to protect the personal data that we collect and process. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal data. When we pass your personal data to a third party, we seek to ensure that they have appropriate security measures in place to keep your personal data safe and to comply with general principles in relation to data protection.

Your rights in relation to your personal data

You have the following rights as a data subject under the UK GDPR in relation to your personal data:

1. Right to rectification (to have incorrect or incomplete personal data updated);
2. Right of subject access (to determine and receive a copy of your personal data held by or on our behalf);
3. Right to be forgotten (to have your personal data deleted or removed if it is no longer necessary for the purposes of processing as set out in this Privacy Notice);
4. Right to restrict processing (to limit the way that we use your personal data);
5. Right to data portability (to obtain and reuse your data for your own purposes);
6. Right to object to processing (where we are relying on legitimate interest and there is something about your situation which makes you want to object to processing on this ground); and
7. Right to reject automated decision making (including profiling, where the decision has a legal or significant impact on you)

In relation to automated decision-making, the Trustees are required to inform you if any decisions are taken about you through an automated process (i.e. without any human involvement). This is not the case in the Scheme at present. The Trustees will notify you if the position changes.

You have the right to lodge a complaint with the relevant data protection regulator (in the UK, this is the Information Commissioner's Office) in relation to the way we process your personal data. For the ICO, you can contact them through their preferred contact methods at the following link - [Make a complaint | ICO](#).

Changes to this Privacy Notice

We will review this Privacy Notice from time to time to ensure it remains up to date and will take appropriate steps to bring any amendments to your attention consistent with the significance of the changes we make.

How to contact us

The Trustees of the Thus Group plc Pension Scheme
Aon
60 York Street
Glasgow
G2 8JX

Date of Notice: 1 March 2025