

EATON UK PENSION PLAN (THE "PLAN")

PRIVACY NOTICE

Eaton UK Pension Plan Trustee Limited, the trustee of the Plan (the "Trustee") is committed to protecting and respecting your privacy. This Privacy Notice explains the types of personal information we collect, how we use that information and who we share it with in order to properly manage and administer the Plan, and also sets out how we protect that information.

Please read the following carefully to understand our practices regarding your personal information. By your continued participation in the Plan, you are agreeing to the practices described in this Privacy Notice.

Who we are

We, the Trustee, are the "data controller" for the purposes of the data protection legislation. Our registered address is PO Box No. 4, New Lane, Havant, Hampshire PO9 2NB, registered number 09992203. The Trustee's representative is Willis Towers Watson, the Plan administrator who may be contacted about any data protection questions you have on eatonpensions@willistowerswatson.com or on 01707 607603.

Information covered by this Privacy Notice

This Privacy Notice covers all personal information collected and used by us. "Personal data" or "personal information" means information that enables you to be identified as an individual or recognised directly or indirectly.

Our legal basis for using your information including how we share it

Under the data protection laws, data can only be processed if the processing is necessary for one or more specified grounds. The main legal basis on which we process your data is that the processing is necessary to comply with our legal obligation to pay your benefits when they become due. We may also need to use your personal information for the purposes of our legitimate interests, being the effective administration of the Plan.

What information do we collect from or about you?

The Trustee may collect information to administer your benefits under the Plan which may include:

- personal details, such as name, date of birth, gender, postal address, email address, phone number, bank details, national insurance number, HMRC details and passport number;
- family and dependant details, current marriage and partnerships and marital history;
- Plan membership details such as member identification number, pensionable pay, length of service, employment and career history and benefit entitlements under the Plan.

Some of the personal information you provide may be "sensitive personal information", such as details about your health in the case of ill-health early retirement. In these circumstances, you will be asked to complete a consent form. This will enable the Trustee to process your sensitive personal information for the purposes set out in the consent form.

Other information we collect about you

The eatonukpensionplan.co.uk site does not store any personally identifiable information and it does not directly record IP addresses. The web site does use Google Analytics.

When you visit our website, www.eatonukpensionplan.co.uk, we may, with your consent, collect the following anonymous technical information:

- technical information, including browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times, and download errors;
- information about your visit, including the websites you visit before and after our website;
- length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers) and methods used to browse away from the page.

Information we receive from other sources

We may receive information about you from third parties; for example your current, former or prospective employer or from anyone entitled to benefit under your membership of the Plan. We may also collect information from your next of kin or (with your consent) from registered medical practitioners.

Who may use your personal information?

We may share your personal information with third parties, where it is necessary to administer the Plan and/or comply with contractual obligations relating to it.

We typically share your personal information with the following organisations:

1. The Plan's administrator

We have appointed Willis Towers Watson as administrator for the Plan ("WTW"). WTW carries out the pensions administration services on behalf of the Trustee and will require access to your personal information in order to calculate and pay benefits under the Plan. It will also perform other activities such as responding to requests or complaints and providing information to members, and so will require access to your contact details. WTW will process your personal information on our behalf as our data processor.

2. Eaton Limited as the principal employer of the Plan and other group companies

Your personal information will only be shared with these entities to the extent that this is necessary for the administration of your pension benefits and for them to meet their legal obligations (including preparing and obtaining a third party audit of their financial statements and fulfilling their commitment to funding the Plan).

3. Other third party service providers

- (a) We may share your personal information with our other service providers who help us administer the Plan, such as the scheme actuaries, Willis Towers Watson. Actuaries are also data controllers and Willis Towers Watson have asked us to include a link to their privacy notice as follows: <https://www.willistowerswatson.com/en-gb/notices/How-Willis-Towers-Watson-uses-personal-data-for-actuarial-services-to-UK-pension-scheme-trustees>
- (b) Other third party service providers such as auditors, investment consultants, legal advisers and insurers may also process personal information on our behalf as data processors or data controllers. We ensure that your information is kept secure by checking that their security measures are adequate and by entering into agreements with such third parties which specify that they must only process personal information on our behalf and according to our instructions.

4. Third parties permitted by law

- (a) 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).

- (b) We may also disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend your rights or those of the public.

5. Third parties connected with business transfers

We may transfer your personal information to third parties in connection with a reorganisation, restructuring, merger, acquisition, sale or transfer of assets, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Notice.

Any personal information held by us and any third party will be treated as confidential. We will not sell your personal information to third parties.

Where we store your personal information

The personal information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") (for example, in the USA). It may also be processed by staff operating outside the EEA who work for us or for one of our service providers (for example, WTW outsource some processing to Mumbai and Manilla). We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice and applicable data protection laws, including, where relevant, entering into EU standard contractual clauses (or equivalent measures) with the party outside the EEA receiving the personal information.

Your rights

You have rights in relation to the personal information we hold about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can obtain more information about these rights from our website, which includes the Trustee's data protection policies and procedures. Please note that we may apply an administrative charge for providing access to your information in limited circumstances. Any such charge will be reasonable and we will advise you of the charge and obtain your consent in advance.

How long do we keep your personal information?

Your personal information is stored by us and/or our service providers, strictly to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws and other legal or regulatory requirements. In the context of providing pension benefits, this period can be extensive, and may continue for up to 15 years after the Plan is wound up. Any information would be removed from our systems and records

or anonymised in accordance with applicable data protection laws and the Trustee's data retention policy, as amended from time to time.

How do we keep your personal information secure?

Any personal information which is collected by the Trustee from the date this Privacy Notice comes into force will usually be collected via a secure server. Historically, your personal information may have been collected in hard copy and any such information is either securely archived or has been securely destroyed. As part of our security measures, we may sometimes require you to give proof of your identity before we disclose personal information to you.

Changes to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, regulatory or operational requirements. We will notify you of any such changes (including when they will take effect). Your continued participation in the Plan after any such updates take effect will constitute acceptance of those changes.

Making a complaint

We would be happy to address any concerns you have directly in the first instance. Should you have a need to escalate your complaint, you have the right to lodge a complaint with the UK data protection authority:

Information Commissioner's Office
Wycliffe House
Water Lane, Wilmslow
Cheshire, SK9 5AF

Tel. +44 1625 545 745
e-mail: international.team@ico.org.uk
Website: <https://ico.org.uk>

Contacting us

If you have any questions or concerns about how we treat your personal information, you wish to ask us to stop processing your personal information, or you would like to request a copy of the personal information we hold about you, please contact us at eatonpensions@willistowerswatson.com or by writing to us at:

Eaton UK Pension Plan
Willis Towers Watson
Po Box 545
Redhill
RH1 1YX

Please include your reply address when you write to us.

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