

Acer Group Pension Scheme - Privacy Notice

This Privacy Notice has been issued by the Trustees of the Acer Group Pension Scheme (the “**Scheme**”) to provide information on how your personal data is processed in accordance with applicable data protection legislation.

Who are we

The Trustees of the Scheme (“**we**”, “**us**”) are John Greiller, James Dessain, Jeremy Walters, David Threlfall and Carlos de Freitas. Together, we are the controllers of your personal data for the purposes of data protection legislation. You can contact us in writing through our administrators using the following details:

Postal Address

Acer Group Pension Scheme
Barnett Waddingham
3 Devon Way
Longbridge
Birmingham
B312TS

Email address

Acer@barnett-waddingham.co.uk

Telephone number

0333 11 11 222

As the controllers of your personal data, we determine how and why your personal data is processed. Similarly, other parties involved in running the Scheme will sometimes need to make decisions about how your personal data is used for those purposes. This includes the Scheme Actuary, Paul Hubbard of Barnett Waddingham LLP, who (in their role as such) will also act as a controller of your personal data.

How we collect your personal data

We collect your personal data directly from you or your employer (Arcadis Consulting (UK) Limited (formerly Hyder Consulting (UK) Limited) or an associated company). We may also receive personal data from other sources such as HMRC, law enforcement agencies, external tracing agencies or (if you are a beneficiary or potential beneficiary) from expression of wishes forms completed by a member of the Scheme.

In connection with any request made by you of a pensions dashboard, we may also receive your personal data in pseudonymised form from a pensions dashboard or from the underlying systems operated by the Money and Pensions Service.

What personal data do we collect

We collect and process the following categories of personal data, including but not limited to: Contact details: first name and last name, postal and/or email address and telephone number;

- Identifying details: National Insurance number, gender, age, date of birth,;
- Marital data: name, contact details, gender and age of spouse or civil partner
- Employment data: employment history, employment dates and historic pay records;

- Financial data: bank details, salary, pensions contributions, Scheme joining and leaving dates, HMRC tax data, and investments and personal assets held outside of the Scheme; and
- Special categories of personal data: this includes ill health data, which we may process in the case of ill-health early retirement or similar circumstances.

How and why we process your personal data

We collect and process your personal data for the purpose of managing the Scheme and paying benefits to you and/or your spouse and dependants. This may include use of personal data for risk management purposes, de-risking exercises and undertaking liability management, and to comply with our legal obligations.

If you request pension information via a pensions dashboard, we are under a legal obligation to process and authenticate your request and to make your pensions data available to you on that dashboard. In order to comply with this legal obligation, we are required to connect to the digital platform operated by the Pensions Dashboard Programme (a function of the Money and Pensions Service), and where a request for information is received, to share accurate, up-to-date information relating to your pension via that platform.

Our lawful basis for processing personal data

By law we are required to justify our processing of your personal data on one or several defined legal grounds. The lawful basis for our use of your personal data will generally be one or more of the following:

- for the performance of the contract of employment between you and your employer regarding your participation in the Scheme;
- to comply with our legal obligations,
- for our legitimate interests as the Trustees of the Scheme to: effectively operate, administer and audit the Scheme; and to manage the impact of any change to the legal status of the sponsoring company, provided that your interests and fundamental rights do not override those interests;
- the processing is necessary for the purposes of our or a third party's 'recognised legitimate interests', including for the prevention and detection of crime; and
- in the case of special categories of personal data, such as health data, to perform our obligations under employment law and laws relating to social protection. There may be circumstances where we request your explicit consent in order to process your health data, in which case, we will process your health data on the basis of that consent.

Please note that if you do not provide us with certain personal data or if you withdraw your consent to our processing of personal data that we hold about you (where we rely on consent), we may not be able to perform our duties in relation to the Scheme, and the pension/benefits payable to you and your dependants could be affected.

We may process your personal data for a purpose other than that for which we originally collected it where the new purpose is compatible with the old purpose, or we have your specific consent for the new purpose. If the new purpose is unrelated to the original purpose, we will notify you in writing and explain the legal basis allowing us to continue processing your personal data.

Automated decision-making

Automated decision-making occurs when a decision is made about you based on your personal data, which has a legal or similarly significant effect on you, but which is made by an automated system and without meaningful human involvement. An example of this would be where we make a decision concerning the payment of pension benefits to you. We do not currently make any automated decision-making about you.

Who we share your personal data with

We may share your personal data with the following organisations:

- the Scheme actuary (Paul Hubbard of Barnett Waddingham LLP) and administrator, Barnett Waddingham LLP;
- your employer and the Principal Employer;
- Additional Voluntary Contribution (AVC) and annuity providers and potential annuity providers;
- our professional advisers and third-party service providers such as the Scheme auditor, pension consultants, and our legal advisers;
- qualifying pensions dashboard service and integrated service providers; and
- regulatory bodies including but not limited to HMRC, the Department for Work and Pensions and The Pensions Regulator.

Some of the organisations and persons mentioned above, such as the Scheme's actuary and auditor, and our legal advisers, will act as controllers of your personal data in their own right. If you would like further information on how these entities process your personal data, please contact us using the contact details provided above.

We share your personal data with these organisations for the following purposes:

- effectively managing the Scheme and paying the correct benefits;
- undertaking risk-management exercises;
- obtaining advice from our professional advisers; and
- complying with our legal obligations.

Where personal data is processed by a third party on behalf of the Trustees, 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 data on our behalf and according to our instructions.

Where your personal data is processed

Your personal data may be processed outside of the UK and the European Economic Area (the "EEA") in the course of managing the Scheme. We will ensure that all transfers of personal data outside of the UK and the EEA are subject to appropriate safeguards, such as conducting a data protection test where necessary, and that such transfers are governed by a transfer mechanism that is compliant with data protection legislation, such as an international data transfer agreement.

How long we hold on to your personal data

We will retain your personal data as needed to provide pensions and benefits under the Scheme, and for such periods afterwards to meet our legal obligations, resolve disputes and enforce our rights. We will review our data retention practices regularly and ensure that your personal data is not held for longer than necessary.

In connection with the pensions dashboard programme, we generate pension identifier codes which link your request (to find or view your pension details) with a pension plan you have with us. These codes can be deleted by you if you delete your account with the relevant pensions dashboard. They will also automatically expire if your dashboard account remains inactive for five years (or other timescale determined by the Money and Pensions Service). We also retain, on a long-term basis, identifier codes which link multiple requests for the same information made by you via a pensions dashboard.

Your rights in relation to your personal data

Under data protection legislation, you have the following rights, in certain circumstances to:

- request access to your personal data and to obtain information about how we process it;
- request rectification or erasure of your personal data;
- request that we restrict the processing of your personal data;
- object to us processing your personal data;
- receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller;
- not to be subject to automated decision-making including profiling where it produces legal or other similarly significant effects on you;
- where we rely on consent as a lawful basis for processing your personal data, the right to withdraw such consent.

Please note that we are only legally obliged to undertake a reasonable and proportionate search of our records and systems in response to any request made by you in exercise of these rights. If you wish to exercise any of the above rights, please contact us using the contact details listed further above. In order to safeguard your personal data, we may need to request further information from you to help confirm your identity and to ensure your right to access the relevant personal data before you can exercise your rights under this section.

Should you make such a request in exercise of any of the above rights, which we consider to be manifestly unfounded or excessive, we may legitimately refuse to act on your request, or we may charge a reasonable fee to meet our costs in providing you with details of the information we hold about you (or to comply with requests for further copies of the same information) where we are entitled to do so under applicable data protection law.

Complaints

If you have concerns or wish to make a complaint about how we process your personal information, you can submit your complaint by email to acer@barnett-waddingham.co.uk. We will acknowledge your complaint within 30 calendar days of receipt. We will respond to your complaint without undue delay and aim to resolve all issues promptly.

Should you need to escalate your complaint, you have the right to lodge a complaint with the Information Commission (the “**ICO**”). You can report your concerns to the ICO by telephoning their helpline on 0303 123 1113 or through their website here: [Make a complaint about how an organisation has used your personal information | ICO](#).

Please note that references in this Privacy Notice to the ICO mean the Information Commissioner’s Office or any successor body to it. In this respect, the ICO is expected to be replaced by a new government regulator called the Information Commission, which will have substantially similar powers and functions.

Changes to this policy

We may update this policy from time to time to reflect changes to reflect changes to our processing activities and to ensure compliance with data protection legislation.

This policy was last updated: May 2026.