

The purpose of this privacy policy is to help you understand who we are, what personal data (information) we hold about you, how and why we collect, store and use it, and how we may share this information with other parties. We do this so we can manage your pension properly. It also explains your rights in relation to your personal information.

Who we are

Dalriada Trustees Limited, as the Sole Trustee of all sections of the Caparo 1988 Pension Scheme (“the Scheme”) (and also the provider of administration services for the LMB section of the Scheme) collects and uses certain personal data about you. When we do so, we are subject to the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018. We are responsible as ‘controllers’ of that personal data for the purposes of those laws. As controllers, we must provide you with the information contained in this privacy notice.

Dalriada Trustees Limited (company number NI37760) has its registered office at Linen Loft, 27-37 Adelaide Street, Belfast, BT2 8FE.

Personal data we collect about you

Personal data is any information that can be used to identify you.

We hold the following personal data about you in the course of acting as the sole trustee of the Scheme:

- personal details such as your name, date of birth, gender, contact details (i.e. address, home and mobile phone numbers, email address) and National Insurance number;
- employment and pension details such as your employment history (including any breaks in service or where service has been transferred in), pensionable service records, salary information, contribution records;
- family and beneficiary information, such as your marital status, details of your spouse/civil partner, dependants, other family members and death benefit nominated beneficiaries;
- online information such as cookie data and IP address (your computer’s internet address) if you use our website www.dalriadatrustees.co.uk
- financial details such as your bank account and tax information to process payments and tax reporting.
- if you have accessed a Pensions Dashboard (an online platform where individuals can access information about all of their pension benefits) we may collect an identifier, used to identify your benefits within the Scheme.

We may also hold ‘special categories’ of personal data (i.e. sensitive information which comes with additional safeguards under data protection legislation). This may include information about your health, including any medical conditions (for example, if you apply for ill-health early retirement).

Dalriada. A better way	Belfast T: +44 (0)28 9041 2018	Bristol T: +44 (0)117 959 5000	Leeds T: +44 (0)113 426 4489	Manchester T: +44 (0)161 641 6313
	Birmingham T: +44 (0)121 389 2320	Glasgow T: +44 (0)141 331 1053	London T: +44 (0)20 7495 5515	dalriadatrustees.co.uk

Signatory of

--	--	--	--	--	--	--	--	--	--

How we collect the information

We may collect this information from:

- you (for example when you fill in a pension form, when you contact the Scheme with a query or complaint);
- the Scheme's sponsoring employer or a former participating employer – employment and payroll records relevant to your membership in the Scheme. *We do not collect information from any current employer that has no connection to the Scheme.*
- another pension arrangement (if you have transferred benefits into the Scheme);
- other members of the Scheme (if they choose to nominate you for the death benefits that may be due on their death);
- persons acting on your behalf - such as a financial adviser, attorney, or legal representative.
- service providers who help us trace members with whom we have lost contact

Pensions Dashboards

The government has created a framework for Pensions Dashboards to help people access information about their pensions online in one secure place.

As part of this, we may be required by law — now or in the future — to match members who search on dashboards with their pensions in the Scheme. This will involve providing certain information to the Dashboards ecosystem (such as the identity service, the pension finder service, and the consent and authorisation service) so that your pension details can be displayed securely when you request them on an authorised dashboard.

These activities may involve sharing personal data with:

- secure entities within the Dashboards ecosystem;
- non-commercial and commercial dashboard providers; and
- the Integrated Service Provider(s) we appoint to connect the Scheme, match people with their pensions, and meet our dashboards duties.

As part of these duties, we may also need to report certain information (which may include personal data) to other bodies, such as the Money and Pensions Service, The Pensions Regulator, and the Financial Conduct Authority.

We will only share the data needed for these purposes and will ensure that it is handled securely, in line with data protection law.

How we use your personal data

We will typically use this data for the following purposes:

- to contact you;
- to respond to individual queries, complaints and disputes;
- to calculate, provide and assess eligibility for Scheme benefits;
- meeting our legal obligations – including, but not limited to, securely connecting the Scheme to the Pensions Dashboards Programme if required, or preparing for a future connection.
- to determine and implement alternative ways of providing Scheme benefits (e.g. by way of a lump sum and/or pension, transfer to another scheme, the purchase of an insurance policy, a merger with another pension scheme);
- to determine and manage Scheme’s investments and risks
- to determine and manage Scheme’s liabilities and funding requirements;
- supporting corporate activities – for example, if a sponsoring employer undertakes a merger, sale or restructuring that affects the Scheme.
- to comply with our legal obligation to connect the Scheme to the Pensions Dashboards digital architecture so that members can view information about their benefits securely online. Once connected, you may choose to access your information through the Government-run Pensions Dashboard or through any other qualifying pensions dashboard service you select.

Reasons we can collect and use your personal information

Data protection law requires us to have a legal reason (“lawful basis”) for collecting and using your personal data. For most of what we do, this will be one or more of the following:

- to comply with a legal obligation (e.g. our obligations to you as trustees to administer the Scheme so that you can receive the benefits you are entitled to and make transfers to other schemes);
- to comply with our legal obligations under the Pensions Dashboard Regulations 2022 and related legislation.
- for the performance of a contract with you, or to take steps to enter into a contract;
- for the purposes of our legitimate interests in running the Scheme properly or those of a third party (e.g. a sponsoring employer), but only if these are not overridden by your interests, rights or freedoms.

Where we hold ‘special categories’ of personal data, we will explain to you at the time why we need it and how the information will be used. We will only process special categories of personal data where we need to do so to establish a right to a benefit. In any other circumstances where we need to process special categories of personal data we will seek your prior consent.

If you give consent, you can withdraw it at any time by contacting us using the details in this notice. Withdrawing consent won't affect the lawfulness of any processing we carried out before you withdrew it.

We aim to keep our collection and use of your data proportionate. If there are any material changes to the type of data we collect or how we use it, we will let you know.

Who we share your personal information with

We share your personal data, including your name, date of birth and address details, with our Scheme administrators, actuaries, legal advisers, auditors and bankers. This data sharing enables us to continue to administer the Scheme in a compliant manner and to ensure our duties as trustees are discharged lawfully.

We will only share your personal information with regulators, courts, or law enforcement agencies if we are required to do so by law — for example, in the event of a fraud investigation or other legal process

We may share personal data with the employer(s) participating in the Scheme; e.g. in connection with member option exercises an employer may want to run.

Where required, or where the Scheme chooses to connect in future, we will also share certain personal data securely with the authorised digital architecture and dashboard providers that support the government's Pensions Dashboards Programme. This allows you to view your pension information safely through an approved dashboard service.

We may share personal information with third parties that form part of the Pensions Dashboard ecosystem to allow us to comply with our legislative duties. This may involve sharing personal data with non-commercial dashboards and commercial dashboards and with the providers (including the Integrated Service Provider (ISP) and Scheme administrators) appointed to help us connect to the dashboard, match member data and comply with our Pensions Dashboard duties.

As part of these dashboard duties, we may also need to report information (which may include personal data) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority and any dashboard you choose to use.

We will not share your personal data with any other third party.

All third-party providers are required to keep your personal data safe, follow our instructions, and only process your data for the specific purposes we authorise.

How does the Scheme Actuary use your personal data?

The Scheme Actuary also acts as a Data Controller and uses your personal data to advise the Trustee on the financial management of the Scheme. This advice helps to ensure the Trustee is able to meet its obligations to pay members' benefits and is necessary to comply with obligations placed on the Trustee by legislation, including the Pensions Act 2004.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

Transfer of your information out of the UK

In certain circumstances, your personal data may be processed outside of the UK - for example, if one of our service providers uses secure servers based overseas.

If we (or our service providers) process personal data outside of the UK, 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 safeguards required by applicable laws.

How long we keep your personal data

We will keep your personal data for no longer than is necessary for to fulfil our legal obligations in relation to the Scheme. Because pension schemes are long-term arrangements, this often means that your personal data will be kept for a long period of time, including after you have ceased to be entitled to Scheme benefits (to deal with any queries or complaints which may arise in relation to the administration of the Scheme or in the event of a legal claim to show that we have administered the Scheme correctly). Personal data will typically be held until the Scheme has wound-up.

Your rights

Under the UK GDPR you have a number of important rights - all free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information;
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- ask us to correct any mistakes in your information which we hold;
- ask us to delete your personal data in certain situations;
- receive a copy of your personal data in a structured, commonly used and machine-readable format and have the right to transmit that data to a third party in certain situations;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal data; and
- otherwise restrict our processing of your personal data in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the Information Commissioner's Office guidance at - <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/>

If you would like to exercise any of those rights, please:

- email, call or write to us; and
- include details that will help us identify you — such as your full name, date of birth, National Insurance number, and, if you know it, your member ID/reference. This helps us handle your request quickly and securely

Keeping your personal data secure

We take the security of your personal data seriously. We have strong measures in place to prevent it from being lost, misused, or accessed without permission.

If a data breach ever did occur, we have clear procedures to respond quickly. Where the law requires it, we would notify both you and the relevant regulator.

How to complain

We hope that we can resolve any query or concern you raise about our use of your personal data.

The UK GDPR also gives you the right to lodge a complaint with the Information Commissioner's Office. They may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published on 04 February 2026 and last updated on 04 February 2026.

We may change this privacy notice from time to time. When we do, we will inform you. Please contact us using the details provided if your personal data changes at all.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you, including any requests to exercise your legal rights.

If you wish to contact us, please send an email to admin@dalriadatrustees.co.uk or call 028 9041 2018, or write to:

The Caparo 1988 Pension Scheme
Dalriada Trustees Limited
Linen Loft
27-37 Adelaide Street
BT2 8FE, Belfast

February 2026