



ELECTROCOMPONENTS PENSION TRUSTEES LIMITED

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N1C 4AG

Mr
Address line 1
Address line
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23 May 2018

Dear

Trustee of the Electrocomponents Group Pension Scheme
Fair Processing Notice

From 25th May 2018, one of the biggest changes to UK data privacy law, the General Data Protection Regulation (GDPR) comes into force.

The privacy and security of your personal information is very important to us and we take our obligations under GDPR very seriously. The enclosed 'Fair Processing Notice' explains how we collect and use your personal information.

If you have any queries or comments on this Notice or concerns about how we handle your personal data please contact us using the contact details at the end of the Notice.

Yours Sincerely

Rod Tanner
Secretary to the Trustee
Electrocomponents Pension Trustees Limited

Trustees of the Electrocomponents Group Pension Scheme
Fair Processing Notice

Your privacy is important to us. We will process your personal data in accordance with applicable data protection law.

The data controller in respect of the personal data you submit to us either directly or via your employer, Electrocomponents Plc or RS Components Ltd, is the Trustee of the Electrocomponents Group Pension Scheme (the “**Scheme**”) who you can contact using the contact details at the end of this notice. We use your personal data that is provided to us to administer and manage your pension and pay you or any person in respect of you the benefits provided by the Scheme.

We process the personal data that you provide to us for the purpose of administering and managing your pension and paying you and/or your spouse and dependants benefits. We therefore process your personal data on the legal basis that either the processing is necessary:

- for the performance of the contract of employment between you and either Electrocomponents Plc or RS Components Ltd regarding your participation in the Scheme;
- to comply with our legal obligations; or
- further to our legitimate interests as trustees of the Scheme.

If you do not provide us with the personal data that we specify is required for administration of the Scheme then we may not be able to administer the benefits provided by it.

We will transfer your data to Electrocomponents Plc or RS Components Ltd, other participating employers or companies in their group and their advisers, the Scheme's advisers, service providers and partner organisations to the extent that it is necessary for the management and administration of the benefits provided by the Scheme. Some of the Scheme's advisers, in particular the Scheme actuary, Scheme's legal adviser and the Scheme auditor will be data controllers in their own right in respect of the data we share with them. If you would like further details of those advisers and how they use your personal data, please contact the Trustee using the contact details at the end of this notice.

We may also disclose your information to third parties in order to operate, administer and audit the Scheme responsibly, in the event that Electrocomponents Plc or RS Components Ltd sell their business or assets (in which case we may disclose your personal data to the prospective buyer), in the event that we decide to de-risk or insure any of the benefits provided by the Scheme (in which case we may disclose your personal data to the prospective insurer) or where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustee, the members of the Scheme, or others. We do not use your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.

Your personal data may be processed outside of the European Economic Area ("EEA") where required in order for us, Electrocomponents Plc or RS Components Ltd to provide benefits to or in respect of you. In each instance, we have ensured that the processing of your personal data outside the EEA is protected in the same way as if it was being processed in the EEA by using one of the following safeguards:

- transferring it to a non-EEA country with privacy laws that are recognised by the European Commission as giving the same protection as those within the EEA;
- ensuring that the processing of data is governed by the Standard Contractual Clauses approved by the European Commission; or
- for data sent to the USA, transfer it to organisations that are part of the Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.

We will keep your personal data stored on our systems for as long as it takes us to provide the pension and other benefits provided under the rules of the Scheme. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data. As a general rule, your personal data will be retained for as long as the Scheme continues and for 15 years following its winding-up.

Data Protection legislation gives you the right to access information held about you. If we receive an access request to provide you with details of the information we hold about you this information will be provided free of charge, except where the Trustee is entitled to request a fee where appropriate in accordance with European Data

Protection Legislation (for example, if the requests are manifestly unfounded or excessive, in particular because of their repetitive character). Where we or third parties are required by law to obtain your consent to the processing of your personal data you are entitled to withdraw your consent. If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds. However, some data, for example data in relation to your health or personal life, is regarded as 'special categories of data' and cannot (unless a legal exemption applies) be used without your specific consent at the time. As the administrator of an occupational pension scheme, the Trustee has to process that special category data to perform its obligations under employment law and the law relating to social protection e.g. in relation to the award of benefits on death or ill-health. We understand this will be a valid legal exemption and we will not require your specific consent to process that data. To the extent that is not the case, we will ask for your consent to process 'special categories of data' but you should be aware that without that consent, we may be unable to administer your pension which may result in you and/or your spouse and dependants not receiving the pension and death benefits provided by the Scheme.

From 25 May 2018, you will be entitled to 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. You can exercise your data protection rights, including your rights to access, restrict, object to the processing of, rectify and erase your personal data by contacting us using the contact details below. Please note that if you ask us to erase your personal data and we do not have a legal justification for retaining that data, we will be unable to administer your pension which will result in you and/or your spouse and dependants not receiving the pension and death benefits provided by the Scheme.

If you are unhappy with the way in which your personal data is being processed you have a right to lodge a complaint with the Information Commissioner's Office. You can report your concerns by telephoning their helpline on 0303 123 1113 or through their website at <https://ico.org.uk/concerns>.

Contact details

If you have any questions or comments on this policy, or concerns about the way we handle your personal data please contact us via email rod.tanner@rs-components.com or write to us at Rod Tanner, Head of Group Pensions, RS Components, and Birchington Road. Corby, Northants, NN17 9RS