Cereal Partners UK Pension Fund

Personal data privacy statement

May 2026

Who we are

As the Trustee Directors of the Cereal Partners UK Pension Trust Limited (the Trustee), we hold certain personal information (known as “personal data”) about Cereal Partners UK Pension Fund (the Fund) members and, where applicable, their dependants and beneficiaries. Most of the personal data held and processed by the Trustee in running the Fund will be personal data (in other words, it is information from which you as an individual can be identified). The Trustee is the data controller of the Fund’s personal data which means the Trustee determines the means by which and the purpose for which the personal data is processed.

Because he also needs access to the personal data that we hold on you in order to look after the Fund, The Scheme Actuary, Mr R Pinder of Lane Clark and Peacock LLP (LCP), is also a data controller. You can read more about this at lcp.com/en/third-party-privacy-notice

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you, your beneficiaries and dependants:

- your name and date of birth;
- your home address and other contact details;
- your gender;
- your National Insurance number;
- your marital status and marital history;
- details of your employment history with Cereal Partners UK;
- details of your salary during your employment with Cereal Partners, and other forms of remuneration;
- details of your bank account;
- details about your dependants and/or beneficiaries;
- medical and other details about your health;
- a ‘pensions identifier’ (a string of characters used to identify your specific benefits under the Fund) if you have used a pensions dashboard (an online platform where you can access information about all of your pension benefits in the UK); and
- your membership details of pension arrangements outside of Cereal Partners UK.

As part of running the Fund, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "sensitive personal data"). In particular, the Trustee may process information about your physical or mental health (whether mental or physical) or information from which your sexual orientation may be inferred.

Sources of the personal data

We will generally collect your personal data from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from the Fund, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries we've carried out on a member's death. We will not collect any personal data from you that we do not need. We will collect the sensitive personal data listed from you or your health provider only with your prior explicit consent.

Personal data relating to the Fund is held on paper and on computer systems. As the "data controller", the Trustee must process this information fairly and lawfully.

The purpose and legal basis for processing the personal data

The Trustee needs to hold and process information about you because it is needed for us to administer the Fund, calculate and pay benefits, fulfil our responsibilities relating to funding and investment, communicate with you in relation to the Fund and your benefits, and other aspects of running the Fund. These processing activities, and the legal basis we rely on for them under the UK GDPR are set out in the table below.

Processing purpose	**Personal Data Categories**	**Legal basis for processing**
Administering the Fund in accordance with its Trust Deed and Rules and applicable law.	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your	We have a **legitimate interest** in administering the Fund in accordance with its governing documents and applicable law.

Processing purpose	Personal Data Categories	Legal basis for processing
	employment, salary, contributions and benefits • other relevant information provided to us	
Determining your eligibility to receive benefits under the Fund.	Information provided by you: • name • date of birth • gender • marital status • financial information • National Insurance number • length of employment • details of dependants • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a **legitimate interest** in determining whether you are eligible for benefits under the Fund.
Determining the benefits payable to and in respect of you and paying the correct benefits on time to the correct recipient.	Information provided by you: • name • date of birth • gender • marital status • financial information • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary,	We have a **legitimate interest** in paying the correct benefits on time to the correct recipient in accordance with the Trust Deed and Rules of the Fund.

Processing purpose	Personal Data Categories	Legal basis for processing
	contributions and benefits • other relevant information provided to us	
Considering your entitlement to an ill health retirement pension under the Fund or considering a person's entitlement to a lump sum death benefit.	Sensitive personal data such as information about your health conditions.	We will ask for your **consent.**
Communicating with you about the Fund and your benefits.	Information provided by you: • name • contact details • other relevant information provided to us	We have a **legitimate interest** in communicating with you about the Fund and your benefits.
Communicating and interacting with you via our member website.	Information provided by you: • name • contact details • IP address • other relevant information provided to us	We have a **legitimate interest** in communicating and interacting with you via our member website.
Conducting member satisfaction research; and engaging with you for the purpose of obtaining your views on the way we administer the Fund.	Information provided by you: • name • contact details • other relevant information provided to us	We have a **legitimate interest** in conducting member satisfaction research and engaging with you for the purpose of obtaining your views on the way we administer the Fund.
Determining whether an individual who submitted a request to a pensions dashboard to locate their pensions information is a match to the Fund's records.	Information provided by you: • name and previous name(s) • address and previous address(es) • date of birth • National Insurance number • contact details such as email address and phone numbers • employer name and details of your employment • other relevant information provided to us (including which we may request in order to identify if you have benefits under the Fund).	We have a **legal obligation** to provide pensions dashboards services. If we find you are not a Fund member, we will delete your personal data as required to comply with pensions dashboard legislation.

Processing purpose	Personal Data Categories	Legal basis for processing
	Information relating to a Find Request may also be received from the Money and Pensions Service. Where you have submitted a Find Request, we will record whether you are a full or partial match to our records, and may share this with the Money and Pensions Service so that an individual knows that we have matched them with a pension record.	
Allowing individuals to access or view their pensions dashboard.	The data that may be accessible through a pensions dashboard is: • Administrative data - such as scheme/fund name, types of benefit provided, date of birth, category of membership, when a member joined and, if available, start and end dates of pensionable service, and employer's name. • Value data - details of how much pension (or other benefits) an individual has built up already and, for active members of the Fund, how much they may have when they retire. • Contextual information – this is provided such as the date as at which the pension and benefits are worked out and the date from which they are payable, whether pensions and benefits for survivors are included, and whether pensions may increase.	We have a **legal obligation** to provide pensions dashboards services.
Establishing, exercising and defending our legal rights.	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us	We have a **legitimate interest** in establishing, exercising and defending our legal rights.

Processing purpose	Personal Data Categories	Legal basis for processing
	Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	
For audit, compliance and other risk management.	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a **legitimate interest** in auditing the Fund and ensuring that it is managed properly.

Who we share it with

We are not allowed to share personal data about you with other organisations and people, unless the law allows us to do so or you have given your consent. As we need to share information with others in order to provide you with benefits, there is a legitimate interest in the Trustee sharing this information. We may also need to share it in order to meet contractual and other legal obligations. We share personal data with the following:

- your current employer which may include Cereal Partners group companies which are based outside the European Economic Area (EEA);
- your past and future employers;

- The following professional advisers to the Fund: the Fund actuary, auditor, medical advisers, investment advisers and lawyers;
- other third parties who are responsible for day-to-day administration of the Fund on behalf of the Trustee (this includes provision of annuity broking services, retirement guidance services, and modelling tools);
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if they fail to provide certain information to these authorities;
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement;
- technical providers for pensions dashboards services;
- the third parties that form part of the pensions dashboard ecosystem that enables pensions dashboard services to work, including the Money and Pensions Service;
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions;
- providers who facilitate the payment of pensions, including our payroll provider and those who assist us when we pay pensions to pensioners who are based overseas, such as BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System); and
- other service providers, including those who support work relating to understanding demographic information relating to the Fund such as mortality tracing agencies.

We may also disclose your personal data to other third parties, for example in the event that we wish to enter a risk transfer of any of the benefits under the Fund, in which case they may disclose your personal data to the prospective counterparty to such a transaction.

International transfers of personal data

The personal data we process may be transferred to one or more countries outside the United Kingdom which has not yet been deemed by the UK Government to offer adequate data protection (third countries). In such cases, we will take steps to ensure an adequate level of data protection in the country of the recipient as required under the UK GDPR, for example, the standard UK International Data Transfer Agreement. Please contact us if you would like further information about these safeguards.

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary to fulfil the purposes listed above. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Fund, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life so that we have the information we need in order to pay your benefits and to answer queries relating to your benefits.

To determine the appropriate retention period for the personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the personal data and whether we can achieve the purpose of the processing through other means. Our retention of the personal data, and the criteria we apply to determine how long it is necessary for us to retain the personal data, is kept under review in accordance with our data retention policy. If we conclude that certain personal data is no longer needed, we will do what's reasonable and proportionate to seek to ensure the Fund administrator (Nestlé Pensions) securely destroys or permanently deletes that personal data or (if that's not possible) puts it beyond use in line with guidance from the Information Commissioner's Office.

Please note the Fund's Independent Trustee Director (PAN Trustees UK LLP (PAN)) may continue to hold personal data collected through its role as a Trustee Director even when it is no longer a Trustee Director of the Fund. Information about PAN's approach in this situation to data security as a firm can be found at pantrustees.co.uk/Scheme-GDPR/

Your rights

- You have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format. This right always applies. However, there are some exemptions which mean you may not always receive all of your personal data that we process.
- If at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected. This right always applies. Please help us to keep the personal data about you and your dependants up to date and inform us of any significant changes to personal data.
- You can require the Trustee to restrict or limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.
- You can object to your personal data being processed where we rely on a legitimate interest as a legal basis for processing your personal data (unless we have compelling legitimate grounds for the processing), although the Trustee can override this objection in specific instances.
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see "Who to contact" below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.
- You can request that your personal data is deleted altogether although the Trustee can override this request in certain circumstances. You should be aware that taking any of the above steps could impact on the payment of your benefits and/or your participation in the Fund. Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data:

If you'd like to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of the notice
- make a complaint about how we have handled your personal data

please contact Nestlé Pensions at:

Write to us at
Nestlé Pensions
Park House South
Manor Royal
Crawley, RH10 9AD
United Kingdom

Call us on
0208 667 6363

Email us at
pensions@uk.nestle.com

Visit the website at
nestlepensions.co.uk

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**.

Updates to this Statement

We reserve the right to update this Statement and any other relevant policies or procedures at any time, and the up-to-date version will be available on our website. The Trustee may also notify you in other ways from time to time about the processing of your personal data.