

**Private and Confidential**

**December 2025**

**PRIVACY NOTICE FOR THE CAMERON McKENNA FINAL SALARY SCHEME**  
**(the “Scheme”)**

As the Trustee of the Scheme, we hold information about Scheme members, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Scheme will be what is known as personal data (information from which you, as an individual, can be identified). This is subject to legal protection.

For legal purposes, the Trustee is known as the “data controller”, as we decide the purposes and means by which any personal data we hold is processed.

**What we do with your data**

As a data controller, the Trustee collects and processes your personal data for the purposes of complying with their legal duties to administer the Scheme, and for other legitimate purposes relating to the operation of the Scheme.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by CMS Cameron McKenna Nabarro Olswang LLP (“CMS”), other schemes from which members have transferred, from HMRC, the DWP and regulatory bodies and from tracing organisations. We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits upon the member's death. We assume that you have the consent of those individuals to provide us with their information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals as doing so is likely to seriously impair our ability to properly pay the benefits due under the scheme. The data we hold is used to assist the Trustee to calculate and pay the benefits the members are entitled to. This includes your name, address, salary, years of service with the Scheme, date of birth, NI number and contact details.

We also hold some special categories or “sensitive” data about individuals for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We will, in most circumstances, process this data as necessary for the establishment, exercise, or defence of legal claims to benefits, or in the performance of our legal obligations in connection with employment, social security, and social protection (as allowed by legislation). If there are any occasions where we seek your explicit consent to process sensitive data, you can withdraw it at any time.

**Who else processes your data?**

We share your personal data with certain third parties involved in running the Scheme, for example, Isio (the Scheme Administrator and provider of actuarial services to the Scheme), the Scheme Actuary – Rick Percival (or such other individual as may be appointed to this role from time to time) and other third parties, such as the Scheme’s legal advisers (CMS), the Scheme auditor (RSM), its AVC providers

(Clerical Medical and Utmost Life), and the insurer who secure and, if applicable, administer benefits under the buy-in contract (Aviva).

The Trustees have entered into a bulk purchase annuity agreement with Aviva. Aviva's Privacy Notice can be found here: <https://www.aviva.co.uk/services/about-our-business/products-and-services/privacy-policy/retirement-privacy-policy/>. This notice explains the personal information which Aviva holds as part of this agreement in respect of the members and beneficiaries whose benefits have been insured, and how it looks after this personal information. This notice also explains members' and beneficiaries' rights in relation to their personal information.

In some circumstances, we are joint controllers with the Scheme Actuary, the legal advisers and auditors (who may process your data to comply with their professional duties as advisers to the Trustee) and CMS. CMS holds your data to comply with its legal obligations as the sponsoring employer of the Scheme. It has a legitimate interest in the Scheme being run in an accurate and cost effective way, and may have an interest in offering certain benefit and other options to members, in addition to being required to comply with various statutory obligations, such as the preparation of accounts. The Trustee may share information with CMS and its auditors and advisers for these purposes.

We may also share your personal information with insurance companies for the purposes of securing benefits where appropriate, and your personal information would be shared on an anonymised data wherever possible. Whenever we share your personal information with a third party, that party is required to enter into a contractual agreement that they will use your personal information only for the purposes for which it is provided, and that they will not pass it on to any other person.

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) or where disclosure is both legally permissible and necessary to protect or defend our rights or protect your rights or those of the public.

CMS, Isio, Aviva, and other advisers will not normally transfer data to other countries, including outside the European Economic Area. If such transfers are required to be made, the parties involved will seek the express instruction of the Trustee and will ensure adequate safeguards are in place.

### **Storage of your personal data**

Pension benefits are paid over a long period, and your right to benefits under the Scheme is based on information which may go back many years. Our policy is, therefore, to retain information relating to you until your membership of the Scheme ends.

Once your membership ends, we may decide to delete some of the data held in relation to you after 6 years. However, information will be held for longer where we consider it appropriate in order to ensure that the Scheme pays the correct benefits and to deal with any benefit queries which may arise after that time.

Isio will hold on to your personal data for 6 years after the termination of the contract with us. This is to protect against any subsequent legal claims.

Aviva will retain the record to respond to any complaints or challenges that might arise for a reasonable retention period, depending on your relationship with them and the reasons they hold your Personal Information. They will also retain files if they reasonably believe there is a prospect of litigation. If you

wish to obtain more information about their data retention policy, you may contact them by mailing to The Data Protection Team, Aviva, PO Box 7684, Pitheavlis, Perth PH2 1JR or via email [DATAPRT@aviva.com](mailto:DATAPRT@aviva.com).

### **Your rights**

You have the right to access your personal data and request that we rectify any errors in the data we hold, or erase your personal data. In some circumstances, you can also request that we restrict the processing of your personal data, object to its processing, or request a copy of your personal data for the purposes of transmitting elsewhere. Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

### **Contact details**

If you have any questions about this please contact the Trustee using the following contact details:  
Address: Cameron McKenna Final Salary Scheme, c/o Isio, PO Box 163, Blyth, NE24 9GS Telephone: 0161 388 1969

Email: [cmckpension@isio.com](mailto:cmckpension@isio.com)

### **What if you have a complaint?**

To make a complaint about how we have handled your information, contact us as set out above.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113 or 01625 545 745