Phoenix Medical Supplies Pension Scheme
Privacy Notice – July 2026

This Privacy Notice has been issued by the Trustees and Scheme Actuary of the Phoenix Medical Supplies Pension Scheme (the Scheme) in line with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation as retained in UK law (GDPR). GDPR came into effect from 25 May 2018.

This document replaces the Scheme's previous Privacy Notice.

Data controllers

The Trustees of the Scheme are Kevin Hudson, Jonathan Fearn and Sandra Roberts. The Scheme Actuary is David Simpson of Barnett Waddingham LLP.

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustees and Scheme Actuary of the Scheme are considered "joint data controllers" (the holders, users and processors of personal data) for the purposes of the GDPR.

The joint data controllers can be contacted as follows:

The Trustees of the PHOENIX Medical Supplies Pension Scheme
c/o Sandra Roberts
PHOENIX Medical Supplies Ltd
Rivington Road
Whitehouse Industrial Estate
Runcorn
Cheshire
WA7 3DJ

Use, transfer and storage of personal data

In order to operate the Scheme and pay benefits to members, we are required to hold member personal information, including the following:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Scheme).
- Salary and data relating to investments and pension assets held outside of the Scheme (for example to the extent they are relevant in relation to taxation of your pension income).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

In the course of running the Scheme, we may require information from you in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner's) health. Such information will be used by the Scheme's administrators to determine the benefits payable to you and your beneficiaries.

Your personal data is provided to the data controllers by the sponsoring employers to the Scheme or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Scheme. Your personal data will be stored for at least the lifetime of the Scheme.

The Trustees share your data with the Scheme's administrator Barnett Waddingham LLP, the Scheme Actuary, the sponsoring employers and AVC providers. They may also share data with the Trustees' other professional advisers (including the Scheme Auditor and pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator).

The Trustees can share your data with the employers for the purposes of providing information to the members about access to the pension freedoms (either via a one-off exercise or as a business as usual offering) or other incentive exercises (such as Pension Increase Exchanges). The Trustees might also share your data with other third parties such as investment managers and insurance companies in connection with the investment of the Scheme's assets and/or securing Scheme benefits through long term insurance contracts.

Your data may be shared by the Scheme's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. A comprehensive list of parties with whom data may be shared is available on request in writing to the Data Controllers at the address above.

The Scheme administrators, on behalf of the Trustees, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustees' legal obligation to run the Scheme in accordance with the Trust Deed and Rules. The Trustees and / or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in your and the Trustees' legitimate interests to use your personal information to:

- Keep up to date and accurate records about your membership of the Scheme in order to calculate and pay benefits
- Undertake risk-management exercises for the efficient management of the Scheme and in the interests of benefit flexibility
- Comply with the law, including regulations and guidance issued by The Pensions Regulator
- Efficiently manage the relationship between the Scheme and the sponsoring employers

The Scheme Actuary uses your personal data to advise the Trustees on the financial management of the Scheme. This advice helps to ensure the Trustees are able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them 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 Trustees.

Your personal data will not be transferred to another country unless you request for this to be done. If you request such a transfer, the Trustees may need to ascertain from the recipient of the data that adequate data protection procedures are in place.

Your rights in relation to your data.

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. If you wish to request copies of your personal data please contact the Data Controller at the address above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to lodge a complaint with the Data Controller (see below).
- You also have the right to lodge a complaint about the Data Controller with the ICO (see below).

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustees may not be able to perform their duties in relation to the Scheme, and your benefits could be affected.

Further details about GDPR and your rights under GDPR can be found on the ICO's website at https://ico.org.uk/.

Complaints

Under the Data (Use and Access) Act 2025 you have a right to complain directly to the Data Controllers about the handing of your personal data. Any complaint will be acknowledged within 30 days of receipt and will be investigated and responded to without undue delay. Please use the contact details above to submit any data protection complaint.

If you are not satisfied with our response to your complaint (or to any response from the Trustees to any other request in relation to your personal data) you can make a complaint to the ICO. Its contact details are:

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

Telephone: 0303 123 1113 or 01625 545 745