

Appendix 1 – Privacy Statement

Trustee of the FirstGroup Pension Scheme

Privacy Notice

This data protection notice explains how the Trustee of the FirstGroup Pension Scheme (“**us**” or “**we**”) uses your personal information.

The Trustee is what’s known as the “data controller” of the personal information we process about you in the context of the FirstGroup Pension Scheme (the “**Scheme**”). This means that we decide how and why that personal information is used. You can contact us by using the contact details provided in the “Contact us” section of this data protection notice.

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

What information do we collect?

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, telephone number, e-mail address, national insurance number, bank account details, and country of residence;
- information relating to your benefits, such as your member identification number, your log-in details, the date you joined or left the Scheme, your earnings, the category and value of benefits that you have built up or received, and relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- in some cases, special categories of personal information such as your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you); and
- information specifically relating to the Pensions Dashboards Programme, such as (i) pseudonymised user account identifiers to link pension find requests to you; (ii) pension identifiers (Pels) to enable your pensions information to be matched to a dashboard; (iii) consents/authorisations to provide your pensions information to the requesting dashboard; and (iv) cryptographic tokens to confirm your consent for us to share your pensions information with a requesting dashboard.

Where applicable, we also collect information about your beneficiaries, dependants or next of kin. Before providing us with any such information, you should provide a copy of the

information in this data protection notice to those individuals.

Where do we get this information from?

The information we collect comes from:

- you (for example, via application forms or other materials you submit to us, or your interactions with us and use of our products and services);
- in some cases, from your employer, or former employer, FirstGroup (or subsidiary of FirstGroup, where relevant);
- in certain cases, from third parties that provide certain services to the Scheme (for example, tracing and mortality screen services); and
- from third parties that provide services in relation to the Pensions Dashboards Programme (for example, the Money and Pensions Service or the dashboard you have chosen to use).

If you are a dependant, beneficiary or the next of kin of a member of the Scheme, then the member will provide certain information about you to us.

How we use your information, and the legal basis for processing your information

We use your information to (i) administer and manage the Scheme, including managing your pension, and paying benefits to you, your next of kin and/or your dependants or beneficiaries; and (ii) enable you to securely find and view your pensions information via your chosen pensions dashboard.

The legal bases for our processing of your personal information are as follows:

- it is necessary for the performance of the employment contract between you and FirstGroup regarding your participation in the Scheme;
- it is necessary to comply with our legal and regulatory obligations (such as (i) disclosures to authorities, regulators or government bodies, under employment law and the law relating to social protection; (ii) fulfilling our legal obligations under the Pensions Dashboards Regulations; or (iii) as required or desirable to protect the rights, property, or safety of the Trustee, the members of the Scheme, or others);
- for our legitimate interests as Trustee of the Scheme (for example, communicating with you in relation to your benefits and contributions, general administration of the Scheme, meeting our on-going regulatory and legal obligations and improving our processes and our use of technology);
- in limited circumstances, your consent – which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits, or where the Schemes rules require you to provide information which we cannot otherwise process without your consent;

If you do not provide us with the personal information we specify is required for

administration of the Scheme, then we may not be able to administer the benefits provided by it.

Disclosures of your information

We share your personal information with the following categories of recipients:

- your employer, FirstGroup, and other participating employers in its group and their advisers;
- Aptia, as the administrator of the Scheme;
- the Scheme's advisers, service providers and partner organisations. This includes but is not limited to: Zedra Inside Pensions, Squire Patton Boggs LLP, Allen Overy Shearman Sterling LLP, Grant Thornton, Linklaters, Mercer, AON and Stephenson Harwood LLP;
- a buyer or prospective buyer, in the event that FirstGroup sells its business or assets;
- an insurer or prospective insurer, in the event that we decide to de-risk or insure any of the benefits provided by the Scheme;
- public authorities, regulators or government bodies;
- operators of any pensions dashboard to which you choose to subscribe; and
- other persons from time to time when the disclosure is needed or desirable to exercise or to protect legal rights, including those of the Trustee or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or those of others.

We do not use your information for marketing or transfer personal information to other organisations for the purpose of marketing their goods or services.

Transferring your information abroad

In some circumstances, the use of your personal information by the Scheme may involve transferring it outside of the UK and the European Economic Area ("EEA"). In each instance, we will ensure that the processing of your personal information is adequately protected – for example, using the Standard Contractual Clauses approved by the European Commission. In particular, since 21 August 2020, Mercer have been using their team in the actuarial centre of excellence to provide a wider pool of support to deliver actuarial services to us. The team is located in India, and is part of Jardine Lloyd Thompson India Private Limited ("JLTI"), which is an affiliate of Mercer Limited. JLTI is a party to Mercer's Binding Corporate Rules agreement, approved by the Information Commissioner's Office, enabling Mercer to transfer personal information to applicable group companies outside of the EEA.

Retention of your information

We review our data retention policies regularly, and will retain your personal information only

as long as necessary for the purpose for which we process that data – for example, to provide the pension and other benefits provided under the rules of the Scheme, or to comply with our legal obligations, resolve any disputes and enforce our rights.

In general, we keep your information for at least 6 years from the date when no further benefits are payable to or in respect of you from the Scheme.

Your rights

Data protection legislation gives you the following rights, in certain circumstances, relating to the personal information we hold about you:

- the right to access your personal information;
- the right to rectify your personal information – for example, where it is incorrect;
- the right to have certain of your personal information deleted;
- the right to request that your personal information is only processed for restricted purposes;
- the right to object to our processing of your personal information; and
- the right to have your personal information transferred to you or another party.

Where we are relying on your consent to process a specific type of personal information about you, you also have the right to withdraw your consent.

You can exercise your data protection rights by contacting us at the details set out in the “Contact us” section below.

If you are unhappy with the way in which your personal information is being processed, you also 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>.

You have the right to make a complaint to the Trustee if you consider that the Trustee has infringed data protection law when handling your personal data. Complaints should be submitted to ZEDRA Inside Pensions, using the details shown below. If you remain dissatisfied following the Trustee's response (or if the Trustee does not respond within a reasonable period), you retain the right to lodge a complaint with the Information Commissioner's Office as described above.

Status of this data protection notice

This data protection notice was last updated in June 2025. We may make changes from time to time. Where we do, we will take appropriate steps to bring them to your attention.

Contact us

If you have any questions or concerns about the processing of your personal information by the Scheme, or if you’d like to exercise your rights under data protection law, please don’t hesitate to contact us:

- By email to Aptia, the Scheme administrator: Firstpensions.uk@aptia-uk.com
- By email to Zedra Inside Pensions, the Secretary to the Trustee:
sta.FirstGroup@zedra.com
- By post:
The Trustee of the FirstGroup Pension Scheme
Third Floor, Trident House
42-48 Victoria Street, St Albans
Hertfordshire AL1 3HZ