Scania Executive Pension Plan (the "Scheme")

PRIVACY NOTICE

Last updated: 17 September 2026

The Trustees of the Scania Executive Pension Plan (the "**Trustees**") are committed to protecting and respecting your privacy. This notice informs you of how we collect, hold and use your personal data, and, where applicable, data relating to your dependants and beneficiaries.

This notice covers all personal data collected and used by us in connection with administering and managing your pension. "Personal data" or "personal information" means information that (either in isolation or in combination with other information held by us) enables you to be identified as an individual or recognised directly or indirectly, and includes data held either electronically, or in paper format. Please read the following carefully to understand our views and practices regarding your personal data, and how we will treat it.

Who we are

The Trustees of the Scheme are made up of employer nominated and member nominated Trustees and are the "data controller" for the purposes of the data protection legislation. Our contact details are set out below. As data controller, we are responsible for ensuring that the Scheme handles your personal data in accordance with applicable data protection laws, including the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025. We are required by law to give you specified information about the personal data we hold about you, how we use it, and the safeguards that are in place to protect it. This notice is designed to give you that information.

Our actuaries, XPS Group, including our individual scheme actuary, Jamie Hunter, act as data controllers when providing certain actuarial and consultancy services. XPS Group has an appointed Data Protection Officer tasked with ensuring its compliance with data protection legislation. Your point of contact for XPS Group or the scheme actuary is XPS Group's Data Protection Officer, whose address is Phoenix House, 1 Station Hill, Reading, United Kingdom, RG1 1NB.

What personal data we collect and how we obtain it

The types of personal data we hold and process about you can include:

- Contact details, including name, address, telephone numbers and email address.
- Identifying details, including date of birth, national insurance number and employee and membership numbers.
- Information that is used to calculate and assess eligibility for benefits, for example length of service and salary information.
- Financial information relevant to the calculation or payment of benefits, for example bank account and tax details.
- Information about your family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death.
- Information about your health, for example, to assess eligibility for benefits payable on ill health, or when your health is relevant to a claim for benefits following the death of a member of the Scheme.
- Information about a criminal conviction if this has resulted in you owing money to your employer or the Scheme and the employer or Scheme may be reimbursed from your benefits.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your involvement with the Scheme.

We obtain some of this personal data directly from you. We may also obtain data from your employer, your current or past employer(s) or companies that succeeded them in business (for example salary information), from a member of the Scheme (where you are or could be a beneficiary of the Scheme as a consequence of that person's membership), additional voluntary contribution (AVC) providers, independent financial advisors (IFAs), solicitors, and from a variety of other sources including public databases, our advisers, from track and trace services, HMRC and government or regulatory bodies.

Third party personal data

Where you have provided us with personal data about other individuals, such as family members,

dependants or potential beneficiaries under the Scheme, you should ensure that those individuals are aware that you are sharing their personal data with us. You should also share this notice with them and ensure that they are aware that they can request another copy of the notice via the contact details provided below.

Why we process your personal data and our legal basis

The Trustees process personal data about you for the proper handling of all matters relating to the Scheme, including its administration and management, calculating, securing and paying benefits and managing liabilities in relation to it.

By law we are required to justify our processing of your data on one or several defined legal grounds. The legal basis for our use of your personal data will generally be one or more of the following:

a) We need to process your personal data to comply with our legal obligations.
b) We need to process your personal data for the legitimate interests of: administering and managing the Scheme and liabilities under it; calculating, securing and paying benefits; and performing our obligations and exercising any rights, duties and discretions the Trustees have in relation to the Scheme.
c) The processing is necessary for the purposes of our or a third party's 'recognised legitimate interests', including for the prevention and detection of crime.
d) The processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract.

Where we obtain information concerning certain "special categories" of particularly sensitive data, such as health information, extra protections apply under the data protection laws. We have to process that special category data to perform our obligations under employment law and the law relating to social protection. Therefore, we do not expect that we will need your specific consent to process that information (because another legal ground will cover our use of that data for these purposes). However, it might be that we ask for your specific consent from time to time to process such data. Where we or third parties are processing your personal data on the basis of your consent, then you are entitled to withdraw your consent. If you do withdraw your 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.

In addition to the processing detailed above, we will also process, disclose or provide your information to the extent required by us according to the Pension Schemes Act 2021 and Pensions Dashboards Regulations 2022. This may involve the provision of information to qualifying pensions dashboard service and to integrated service providers (ISPs). We note that your information is shared with third parties (see further below) to the extent that it is necessary to do so for us to comply with legal obligations to which we are subject, in this instance, to be in compliance with the various obligations on us in relation to the pensions dashboard service.

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 only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for unrelated purposes, we will notify you and we will explain the legal basis which allows us to do so.

How we will use your personal data

We may use this data to deal with all matters relating to the Scheme, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- To contact you.
- To assess eligibility for, calculate and provide you (and, if you are a member of the Scheme, your beneficiaries upon your death) with benefits.
- To identify your potential benefit options and, where relevant, implement those options.
- To allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements.
- To comply with our legal and regulatory obligations as Trustees of the Scheme.

- To respond to queries from you and others that may receive benefits as a consequence of your membership, and to address any actual or potential disputes concerning the Scheme.
- The management of the Scheme's liabilities, including the entering into of insurance arrangements and selection of Scheme investments.
- For statistical and financial modelling and reference purposes.
- In connection with the sale, merger or corporate reorganisation of the employers that sponsor the Scheme and their group companies.

We do not use your personal data for any automated decision making in respect of the Scheme.

Who has access to your personal data
We may share your personal information with third parties, where it is necessary to administer the Scheme and/or comply with contractual obligations relating to it.

It will sometimes be necessary to pass on information to third parties. For example**:**
- We have legal obligations to pass on to government agencies certain information, such as tax or national insurance information;
- We may be audited or checked by third parties, such as the Pensions Regulator, and we may be required by legislation, or otherwise, to provide them with information that relates to your benefits in the Scheme;
- We may transfer your personal data to third parties in connection with a reorganisation, restructuring, merger, acquisition, sale or transfer of assets.

In addition, we share your information with XPS Group, the administrator of the Scheme, and to third party service providers who will hold and process your personal data in the course of providing services to the Scheme that are essential to its ongoing administration. Third party service providers may include the actuary, additional voluntary contribution provider, auditor, investment manager, financial adviser and legal adviser to the Scheme. Your personal data may also be passed to, and processed by, annuity providers, or the sponsoring employers of the Scheme.

Where personal data is processed by a third party on behalf of the Trustees, we ensure that your information is kept secure by checking that their security measures are adequate and by entering into agreements with such third parties which specify that they must only process personal data on our behalf and according to our instructions.

How long we keep your personal data
We will only keep your personal data for as long as we need to in order to fulfil the purposes identified above. In practice this means that we will retain your data for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Scheme and for so long afterwards as may be required to deal with any questions, complaints or claims that we may receive about our administration of the Scheme. We may also retain your data for a longer period to comply with our legal and regulatory obligations. If it is no longer necessary to hold your personal data, we will ensure that it is destroyed securely and will take all reasonable steps to ensure that any third party we use to process the data also does so.

How do we keep your data secure
We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access, use or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. We cannot guarantee the effectiveness of your own security systems when you transmit non-sensitive details, such as your email address, over the internet. However, once we receive your information, we do our best to ensure its security on our systems. Our security technologies and procedures are regularly reviewed to ensure they are up to date and effective.

Where we store your personal data
Currently the data that we collect from you will be stored inside the UK.

However, in the event that we may need to transfer your personal data outside of the UK, including for the management and administration of the benefits provided by the Scheme or where your personal data is processed outside the UK by our advisors or suppliers, we shall ensure that the transfer of your personal data to a third party outside the United Kingdom is, to the extent legally necessary to do so,

subject to appropriate safeguards (including the application of any statutory test regarding the standard of protection provided for in the country to which the data is transferred and, where applicable, entering into the International Data Transfer Agreement or UK Addendum to the EU Standard Contractual Clauses with the relevant recipient) to ensure that the transferred personal data is subject to the same (or not materially lower) protection as it has in the United Kingdom. If any such transfers affect you, you can contact us for more information.

Your rights

Under the UK GDPR you have the right in certain circumstances to:

- Request access to your personal data and to obtain information about how we process it.
- Request correction of the personal data that we hold about you.
- Request deletion of your personal data.
- Request that we restrict the processing of your personal data.
- 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.
- Object to us processing your personal data.
- Make representations or contest, or seek human intervention in respect of, any automated decision-making including profiling where it produces legal or other similarly significant effects on you.

Please note that we are only legally obliged to undertake a reasonable and proportionate search of our records and systems in response to any request made by you in exercise of these rights. We may request additional information from you, including proof of identity, before responding to a data subject access request or any other rights request where we reasonably need to verify your identity or clarify the scope of your request. In these circumstances, the statutory response period will be paused until we receive the information required.

You can obtain more information about these rights from James Duggan who is Chair of the Trustees, c/o Scania@vidett.com. Should you make such a request in exercise of any of the above rights, which we consider to be manifestly unfounded or excessive, we may legitimately refuse to act on your request, or we may charge a reasonable fee to meet our costs in providing you with details of the information we hold about you (or to comply with requests for further copies of the same information) where we are entitled to do so under applicable data protection law.

Further information and contact details

Please contact Andrea Smith (XPS Group) on 0121 752 9331 or via scania@xpsgroup.com if you have any queries regarding this notice or wish to receive further details of our privacy practices or a copy of our Data Protection Policy.

If you wish to exercise any of your rights in relation to your personal data, please also contact Andrea Smith (XPS Group) on 0121 752 9331 or via scania@xpsgroup.com, who will provide you with a request form to complete.

If you wish to contact the Trustees directly, please email Scania@vidett.com or alternatively you may write to The Trustees of the Scania Executive Pension Plan, c/o James Duggan, Chair of Trustees, Vidett Trust Corporation Limited, 3rd Floor, Forbury Works, 37-43 Blagrave Street, Reading, RG1 1PZ.

Making a complaint

If you have concerns or wish to make a complaint about how we process your personal information, you can submit your complaint by email to Scania@vidett.com. We will acknowledge your complaint within 30 calendar days of receipt. We will respond to your complaint without undue delay and aim to resolve all issues promptly.

Should you have a need to escalate your complaint, you have the right to lodge a complaint with the UK data protection authority:

Information Commissioner's Office (or any successor organisation)
Wycliffe House
Water Lane, Wilmslow Cheshire, SK9 5AF
Tel. 0303 123 1113

Website: https://ico.org.uk

FOR AND ON BEHALF OF
THE TRUSTEES OF THE SCANIA EXECUTIVE PENSION PLAN

September 2026 Edition