

Nampak Staff Pension Plan (The “Plan”)

PRIVACY NOTICE

You are currently a member or beneficiary of the Plan, and the trustee of the Plan (the “**Trustee**”) holds personal data in respect of you. The Trustee and Plan Actuary are “data controllers” in respect of that data, which means that they are ultimately responsible for ensuring that it is kept secure, and is not processed for unlawful purposes. This notice has been issued on behalf of both the Trustee and the Plan Actuary and sets out the purposes for which it holds your data, and your rights in respect of that data.

The UK's data protection legislation includes the Data Protection Act 2018, the General Data Protection Regulation 2018 as it was incorporated by the UK following on from Brexit (“**UK GDPR**”), the Privacy and Electronic Communications 2023 and the Data (Use and Access) Act 2025 (each as amended from time to time) which are together referred to as the “**data protection laws**”) and governs how personal data is used by organisations. The Trustee determines the purposes and means of processing personal data held for the purposes of the Plan (“**Plan Personal Data**”) and as such is a controller as defined in the data protection laws (“**Data Controller**”) of Plan Personal Data for data protection purposes, particularly with regard to the Plan’s members and their beneficiaries. In this Privacy Notice the terms “**we**”, “**us**” and “**our**” refer to the Trustee.

The Plan’s administrator, Barnett Waddingham, carries out most of the processing of personal data on behalf of the Trustee, meaning it is a “**Data Processor**” for the purposes of data protection laws.

Why does the Trustee hold your personal data?

The Trustee relies on the following lawful bases under data protection laws to process your personal data:

- Compliance with its legal duties to effectively administer the Plan, including regulations and guidance issued by the Pensions Regulator. This includes the following purposes:
 - General administration of the Plan, including calculating, recording and paying benefits;
 - Communicating with members or beneficiaries in relation to their benefits, responding to requests, queries and complaints;
 - Meeting the Trustee’s ongoing regulatory, legal and compliance obligations;
 - To respond to requests you make with the Pensions Dashboard Programme or other pensions dashboards providers to view and access the current status and value of your pension.
- For the Trustee’s legitimate business interests relating to the ongoing management of the Plan, which interests do not outweigh the risks and freedoms of the data subject. This includes the following purposes:
 - Risk management purposes such as longevity modelling, managing the Plan’s assets, purchasing insurance solutions to protect your benefits from longevity, inflation or investment risk and member option exercises (including pension increase exchange and transfer value exercises);
 - Improving our processes and use of technology, including testing and upgrading of systems.
- We may also use your personal data where we have a Recognised Legitimate Interest formally recognised in data protection law. This includes the following purposes:
 - sharing personal data with public authorities to support the performance of their public tasks;
 - detecting, investigating or preventing crime;

- for the purposes of sharing personal data with public authorities to support the performance of their public tasks or
- safeguarding a vulnerable individual.

The Plan Actuary will process your personal data to undertake various tasks, primarily around scheme funding.

The Trustee will only use your personal data for the purposes for which it has been collected, unless it reasonably considers that it needs to be used for another reason and that reason is compatible with the original purpose. If the Trustee needs to use your personal data for an unrelated purpose, it will notify you and will explain the legal basis which allows them to do so.

What personal data is held by the Trustee?

Your personal data held by the Trustee includes your:

- name, gender, address, date of birth, National Insurance number, marital status;
- contact details;
- banking details (where required) and tax information in relation to your pension benefits;
- information about your employment and membership of the Plan (for example service dates, employment history, membership dates, salary information, and benefit amounts); and
- information about any other pension arrangements you have
- details of family, lifestyle and social circumstances (such as details of current and past marriages or civil partnerships, details about personal relationships, details of dependants, children and nominees).

Special Category Data

In exceptional circumstances the Trustee may need to hold special categories of personal data in respect of you. For example, information relating to your health where this is relevant to the calculation and payment of your benefits, in relation to ill-health early retirement or death benefits and where your marital or civil partnership status reveals your sexual orientation .

In most cases the Trustee will hold this data for the purpose of carrying out obligations in employment, social security and social protection, for reasons of substantial public interest including the administration of occupational pensions schemes.

We may also, typically if considering claims under the Plan's Internal Dispute Resolution Procedure, process any special category data for the purpose of establishing, exercising or defending legal claims.

Where the Trustee seeks your explicit consent to the collection and use of the information, you are entitled to withdraw that consent at any time.

How does the Trustee collect your personal data?

The Trustee obtained your personal data from First Circle Packaging Ltd (or the data of the member of the Plan, if you are in receipt of a dependent's pension) when you (or the member) became a member or beneficiary of the Plan.

We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member's death. We will not provide a copy of this notice to those individuals as to do so is likely to seriously impair our ability to properly pay the benefits due under the Plan.

The government has established pensions dashboards to allow individuals to securely access their pension information online in one place (the "**Pensions Dashboard Programme**"). By law, we must connect to this system, which, if a member requests it, requires preparing and matching member data to verify if an individual has a pension with us. If a match is found upon the issue of a request, relevant pension data will be shared with that individual. If there is only a possible match, further

checks will be carried out. This process involves sharing your personal data (including name, date of birth, and address) with the relevant pensions dashboard provider. In connection with the operation of the Pensions Dashboard Programme, member data may also be shared with regulatory bodies like the Money and Pensions Service (MaPs), the Pensions Regulator and the Financial Conduct Authority.

From time to time, Barnett Waddingham will also obtain your personal data directly from you as a result of communications with you on behalf of the Plan, including where you send a query or raise a complaint.

Who else receives or processes your personal data?

In addition to Barnett Waddingham, the Trustee has a number of professional advisers who need to access and process your personal data from time to time to allow the Plan to be administered properly.

Barnett Waddingham will only supply your personal data to these other organisations on the instructions of the Trustee. The parties to whom the Trustee may allow access to your personal data are as follows:

- First Circle Packaging Ltd, the Plan's sponsoring employer, and their professional advisers;
- the counterparties to the Plan's investments;
- the Plan's banks;
- Barnett Waddingham as the Plan's actuarial adviser;
- Michael Lawson of Barnett Waddingham as the Plan's Actuary;
- Squire Patton Boggs (UK) LLP as the Plan's legal advisers;
- Cooper Parry Group Limited, the Plan's auditors;
- the Money and Pensions Service in connection with the Pensions Dashboard Programme and any other private pensions dashboards providers in which you have provided your details to (for example, Equisoft is the Plan's Pension Dashboard provider);
- local or foreign regulators, governments, law enforcement and tax authorities;
- local and foreign courts, tribunals and arbitrators or other judicial committees, if applicable;
- insurance companies (including insurance solutions providers who protect your benefits from longevity, inflation or investment risk); and
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change to the Plan or the Plan's sponsoring employer (including any potential or actual purchaser of the sponsoring employer or their parent companies and that purchaser's advisers).

Where your personal data is shared with an insurance solution provider as described above, there are two different levels of data sharing:

- at 'buy-in' stage some limited personal data will be shared (including your marital or civil partnership status) so the Trustee can buy the insurance policy;
- at 'buy-out' stage, all of your personal data will be shared (including your health data); you will have an individual policy with the insurer and the Trustee will no longer be a Data Controller.

In some circumstances, the Trustee will be a joint Data Controller with the Plan Actuary, and First Circle Packaging Limited who hold your personal data to comply with their own legal obligations in relation to the Plan.

Further details on how the Plan Actuary and First Circle Packaging Limited hold your personal data can be obtained from Barnett Waddingham:

Barnett Waddingham
Decimal Place
Chiltern Avenue
Amersham
HP6 5FG

Email: nampak@barnett-waddingham.co.uk
Tel 0333 1111 222

How long is your personal data held?

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

Once your membership ends, we may decide to delete some of the data held in relation to you after an appropriate period of time. However, information will be held for longer where we consider it appropriate in order to ensure the Plan pay the correct benefits and to deal with any queries relating to your benefits that may arise after that time.

When determining how long it will hold your personal data, the Trustee considers the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which your personal data is processed and whether it can achieve those purposes through other means, and the applicable legal requirements.

Will your personal data be kept in the UK?

The Trustee does not intend for your personal data to be transferred out of the UK. To the extent that this is required (e.g. to ensure efficient operation of the Plan), such transfers of data will be governed by Data Protection Laws (for example it will only be transferred to a country covered by an adequacy regulation of the UK Government or it will only be transferred subject to appropriate safeguards the Trustee has put in place) and all reasonable steps will be taken to ensure that your data is handled safely and in accordance with this privacy notice.

What rights do you have in respect of your personal data?

You have a number of rights in respect of your personal data held by the Trustee:

- the right to request information regarding the processing of your personal data, including
 - to be provided with information about the way your personal information is processed;
 - to be provided with access to a copy of your personal data held by the Trustee;
- the right to request that your personal data be rectified if it is incorrect;
- the right to request that your personal data is deleted in certain specific circumstances set out in data protection laws;
- the right to restrict the processing of your personal data in certain specific circumstances as set out in the data protection laws;
- the right to object to us processing your personal data for purposes based on the Trustee's legitimate interests. In some cases, the Trustee may be able to show that our need to process your personal data overrides your right to object;
- the right to have your personal data transferred to your or a third party ; and
- you have the right complain to us (please use the details below), and thereafter to escalate your complaint to the Information Commissioner's Office (contact details below).

Further information about your rights can be found at www.ico.org.uk).

Where we have requested and obtained your explicit consent to process special category data, you may withdraw that explicit 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 to which you are entitled. This does not affect the lawfulness of processing based on explicit consent before its withdrawal.

How can you get more information or exercise your rights?

If you have any questions about this notice, would like access to the information that the Trustee holds about you, exercise your rights as a data subject (including to complain about the way the Trustee has handled your rights request or processed your personal data, or if you otherwise think that the Trustee does not comply with data protection law) or if any of the information the Trustee holds about you is inaccurate or out of date, please contact us by:

Emailing: nampak@barnett-waddingham.co.uk

Or by writing to:

Barnett Waddingham
Decimal Place
Chiltern Avenue
Amersham
HP6 5FG

You can also telephone on 0333 1111 222.

What if you have a complaint?

If you are not satisfied about the outcome of your complaint, you have the right to escalate it to the Information Commissioner's Office. The ICO deals with complaints and disputes which concern the way in which your personal information (or the personal information of someone you are representing) has been handled. Whilst there is technically no legal deadline for general data protection complaints, the ICO strongly recommends escalating issues promptly.

Instructions on complaining to the ICO about the use of your personal data can be found on the ICO website (ico.org.uk) and their contact details are:

Address:

Information Commissioner's Office,
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Telephone number: 0303 123 1113 or 01625 545 745

Keeping your information up to date

It is important that your personal data is up to date. Please contact nampak@barnett-waddingham.co.uk as soon as possible following any change to your details, including your contact details.

Changes to this privacy notice

The Trustee may change this Notice from time to time and we will notify you of any changes the next time we communicate with you, such as in the Summary Funding Statements that are issued on a regular basis. This Privacy Notice was last updated in June 2026.