The Thomson Corporation PLC Pension Scheme

Privacy Notice

Dear Member [●] 2026

Who we are
As the Trustee of the Scheme, we hold certain personal information (known as "personal data") about Scheme members and, where applicable, their dependants and beneficiaries. Much of the data held and processed by the Trustee in running the Scheme will be personal data (in other words, it is information from which you as an individual can be identified).

What information do we collect about you?
Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name, gender, age and date of birth
- your email address, postal address, telephone and mobile number
- your national insurance number and your employee number
- financial details such as your income, salary, assets and investments, your bank account (to pay benefits to you if you are a pensioner or to pay a lump sum to you on retirement), your tax code, benefits, grants and insurance details
- employment details such as your pensionable pay, length of service, employment and career history, recruitment and termination details
- documentary data such as details from certain documents or copies of them as proof of identity, residency, employment and key dates, which could include a passport, driving licence, birth certificate and marriage certificate.
- details about your current relationship status, marital/relationship history, family and dependants and/or beneficiaries where this is needed so that we can pay benefits following your death
- if you apply to begin to receive benefits on grounds of ill health, medical and other details about your health.

How do we collect personal information about you?

We collect your personal information when you, your employer, a member of the Scheme or another person contact us online, by phone, text, email, or post. We also obtain your personal information where this is provided through any other engagement or correspondence that you, your employer, a member of the Scheme or another person may have with us. We may also collect personal information about you from other third parties including tracing agencies and from public sources when we believe it is appropriate for us to do so.

How do we use that information?
The Trustee needs to hold and process information about you as it is needed for us to administer the Scheme and to calculate and pay benefits. Administering the Scheme requires us to use and process your personal data in many ways, such as:

- to allow us to comply with our obligations towards members under the Scheme governing documents, as well as under relevant legislation and any other agreement that we have with, or concerning, you

- in relation to any correspondence related to the administration of the Scheme (including queries relating to membership of the Scheme, communications with nominated or appointed Trustee directors and communications when we are unable to contact members of the Scheme)
- to notify you about our services and changes to our services
- for statistical, financial modelling and reference purposes
- for internal record keeping
- risk management, for example to verify the identity of members in phone calls, etc.
- complying with any present or future law, rule, regulation, guidance or directive, and complying with any industry or professional rules and regulations or any applicable voluntary codes
- complying with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and complying with any subpoena or court process, or in connection with any litigation
- in connection with any sale, merger, acquisition, disposal, recognition or similar change involving the Scheme
- to process Trustee nominations
- to carry out surveys for the purposes of benchmarking to run compliance checks
- to analyse and improve the activities, services and information offered by the Scheme administrator's online administration site
- in connection with the purchase of Scheme investments such as 'buy-in' agreements with insurance companies.

In legal terms, this means that we have a legitimate interest in processing the information. Our legitimate interests may include:

- providing any clarification or assistance in response to your communications
- improving our service to you as a Scheme member or beneficiary
- ensuring that you are aware of your benefits and entitlements
- complying with our record-keeping duties
- ensuring that we pay the correct benefits at the correct time
- managing the risks to the Scheme so that we can help to make your pension safe
- complying with all laws, guidance and codes that apply to the Trustee and/or the Scheme, as well as with data requests from regulators, governments, courts and law enforcement authorities
- minimising disruption to the Scheme if there is ever a change to our business.

We will not collect any personal data from you that we do not need.

Personal data relating to the Scheme is held on paper and on computer systems. As the "data controller", the Trustee must process this information fairly and lawfully.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries. This is known as "sensitive personal data" and it includes information that relates to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations.

Who do we share it with?

We are not allowed to share personal data about you to other organisations and people, unless the law allows us to or you have given your consent. As we need to share information with others in order to provide you

with benefits, there is a legitimate interest in the Trustee sharing this information. We may also need to share it in order to meet contractual and other legal obligations.

We share personal data with the following:

- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustee
- your employer (i.e. the company that employs you while you are or were a member), other companies in the group and the counterparties to the Scheme's investments
- the Scheme's professional advisers, including the Scheme actuary, auditor, investment adviser and lawyers, including advisers and prospective insurers in connection with the purchase of Scheme investments such as 'buy-in' agreements
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) or other third parties as required by law – the Trustee can be fined and subject to other action if it fails to provide certain information to authorities
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change involving the Scheme (including any potential or actual purchaser and their advisers)
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) in the UK and/or a payment via Western Union when pensions are being paid overseas
- tracing agencies who assist the Trustee with updating Scheme data from time to time

The Scheme actuary, auditor and lawyers are also data controllers in relation to your personal information and have to comply with their own legal obligations, industry codes and standards when processing your data. Information about where to find their data protection information can be obtained from the Scheme Secretary (TTC.PM@Howden-Group.co.uk)

Transfers of your personal information

We may transfer, store, or process your personal information at a destination outside the UK or European Economic Area (EEA) (in the event that Scheme Personal Data is Processed in the EEA). Where the countries to which your personal information is transferred may not offer an equivalent level of protection for personal information to the laws of the UK, we will take reasonable steps to ensure that your personal information is treated securely and in accordance with this notice. This may include entering into data transfer agreements based on the model clauses approved by the Information Commissioner of the European Commission, to ensure that third parties to whom we transfer personal information in those countries commit to ensuring an adequate level of protection for your personal information. You may request a copy of the agreement that we rely on to transfer your personal data to third countries by emailing us.

Where we have put a contract in place as a safeguard, we will take any other steps that we believe are necessary to protect your personal data based on an assessment of the particular transfer to this agent or adviser, and require the agent or adviser also to take any appropriate steps.

How long do we keep personal data for?

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life so that we have the information we need in order to pay benefits and to

answer queries relating to your benefits. We review the personal data held in relation to the Scheme on a regular basis in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

Your rights

- You have the right to request information about the processing of your personal data, see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format.
- If at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected.
- You can require the Trustee to restrict/limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.
- You can object to your personal data being processed, although the Trustee can override this objection in specific instances.
- Where, in rare circumstances, we have relied on your consent to process your personal data, you can withdraw that consent at any time by notifying us (see "Who to contact" below).
- You can request that your personal data is deleted altogether.
- You have the right to complain to the Trustee, the Information Commissioner (or to your local data protection authority), or to a court of law, if you believe that the Trustee has not processed your personal data in accordance with data protection rights (see "Making a complaint to the Information Commissioner's Office" below). You may be entitled to claim compensation as a result of unlawful processing of your personal data. For more information on how to raise complaints to either the Information Commissioner or the Trustee, please see below.

You should be aware that taking any of the above steps could impact on the payment of your benefits, the ability for you to build up benefits and our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- make a complaint about how we have handled your personal data

please contact the Scheme administrator on **0800 488 0797** or by email at TTCPension@isio.com

The Trustee's contact details are: The Thomson Corporation Pension Trust Limited, Five Canada Square, Canary Wharf, London, United Kingdom, E14 5AQ. Email: TTC.PM@Howden-Group.co.uk (Scheme Secretary)

You can make a complaint to the Trustee using the Scheme's internal dispute resolution procedure (**IDRP**). You can obtain a copy of the IDRP from the Scheme's administrator (see contact details above).

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, or you wish to raise a complaint directly, you can complain to the Information Commissioner's Office online at ico.org.uk/make-a-complaint or via telephone **0303 123 1113.**

Changes to our data protection arrangements

From time to time we may update this privacy notice and the data protection arrangements described above. If we make any substantial changes, we will provide you with a new version of this notice.