

PRIVACY NOTICE

The Trustees of the Metaswitch Networks Plan 88 (the “Plan”) are named individuals as confirmed in the Plan’s Trust Deed and Rules (individually the “Trustees”, together the “Trustee”) dated 3 September 1992, as amended from time to time (the “Trust Deed and Rules”).

The Data Protection Act 2018 is the UK’s implementation of the General Data Protection Regulation 2018 (“GDPR”; together the “data protection laws”) and controls how personal information is used by organisations, businesses or the government. For the purposes of GDPR and legislation implementing data protection laws in the UK, the Trustees are the data controllers. In this Privacy Notice the terms "we", "us" and "our" refer to the Trustees.

We take your privacy seriously, and we are committed to protecting it. This Privacy Notice explains how we will use any personal information that we collect from you or that is provided to us by you or a third party in connection with your membership of the Plan.

From time to time we may make changes to this Privacy Notice.

Information we collect about you

You, and Metaswitch Networks Limited (the “Company”) in its capacity as principal employer of the Plan, have provided us, and may in future provide us, with information relating to your employment with the Company and your membership of the Plan.

We may hold the following information:

- personal details such as your name, date of birth, email and postal address, national insurance number, and, if relevant, details about any ill-health you have suffered or are suffering;
- family details such as whether you are married or in a civil partnership, and details about your children, dependants and other family members; and
- employment details such as the pensionable pay you received while in employment, any bonuses your received, and your length of service; and
- if any retirement lump sums have been paid to you, we will hold information such as your bank account details.

How we use your information

We use your information to ensure the effective, efficient and accurate management of the Plan in accordance with the Plan Rules and the law. This includes using your information to enable us to calculate and pay the correct pension benefits during your lifetime and on your death. We may use your information to enable us to communicate with you.

In order to use your personal information, we must have a lawful basis for doing so. Mostly, the reason that we have for using your information is to enable us to carry out the role of Trustee of the Plan (known as 'legitimate interest'). Without using your information, we could not operate the Plan effectively. In some

situations, however, we are required by law to use your information, and in limited circumstances we can only use your information where we have your consent to do so. If your consent is needed, and has not already been obtained, we will not use your information until we have sought and obtained your agreement.

Who we share your information with

We will not sell your personal information and we will not transfer it outside of the EEA without appropriate safeguards in place. We will only share your personal data with selected recipients and only where it is necessary to do so for the purposes mentioned above in relation to how we use your information. As at the date of this Privacy Notice, we share your information with the following persons for the following reasons:

- Ascot Lloyd to enable them to provide administration services to the Plan.
- The Plan auditor, currently Taylor Associates LLP, to enable it to complete the audit of the Plan's Annual Report and Accounts.
- Aon Investment Ltd, to provide investment services to the Trustee.

In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, local or foreign regulators or to judicial or administrative authorities) or where disclosure is both legally permissible and necessary to protect or defend our rights or protect your rights or those of the public.

Any personal information held by us and any third-party will be treated as confidential. We will not sell your personal information to third parties.

Keeping your information secure

The security of your personal information is important to us. We will take all steps reasonably necessary to ensure that your personal information is kept safe and secure in accordance with data protection laws. We will take appropriate measures to protect your personal information against loss, theft, and unauthorised use.

At present data is not transferred outside the EEA but if in the future any of the advisers or the Trustees do transfer personal data appropriate safeguards will be put in place.

How long we will keep your information

Your personal data is stored by us and/or our service providers strictly to the extent necessary for the performance of our obligations, which in the context of providing pension benefits, is extensive. We and/or our service providers will typically store your personal information for the life of the Plan (or, in the event that the Plan were to wind up, for 6 years after such time). Retention of your personal information enables us:

- to process and pay your benefits and benefits that may be payable after your death;

- to respond to queries from members or your beneficiaries about your correct benefit entitlement, which queries may be received many years after members have transferred out or taken a refund of contributions or made elections to change their benefits; and
- to respond to legal claims.

We will not keep information longer than it is needed. Once your information is no longer needed, we will take reasonable steps to securely destroy it.

Your rights regarding your information

Under data protection laws you have increased rights in relation to your personal information.

You have the right to access information that we hold about you, and to obtain certain information about how we use your information and who we share it with. In some situations, we may be exempted from providing this information, for example if doing so would reveal personal information about another person.

You have the right to have any errors in the information held about you corrected. If you wish to request a correction, please explain in detail why you believe the personal information we hold is inaccurate or incomplete.

You also have certain additional rights, for example to have your personal information permanently deleted, to request that we stop processing your personal information, and to request that we transfer your personal information to another party. If the reason why we are able to process your personal information is because you have given consent for us to do so, you may withdraw that consent at any time.

If you would like to exercise any of these rights, please contact us using the contact details below. Please note that we will need to verify your identity before we can respond to your request.

Complaints

You also have a right to make a complaint about how we use your personal information. Please contact us in the first instance and we will do our best to resolve the matter to your satisfaction.

This does not affect your legal right to complain to the Information Commissioner's Office, which is the UK data protection supervisory authority. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline (0303 123 1113).

Contact us

If you have any questions, comments or requests regarding this Privacy Notice or use of your personal information, please get in touch.

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