

Manweb Group of the Electricity Supply Pension Scheme

Privacy Information Notice

As Trustee of the Manweb Group of the ESPS (the “Scheme”), we are committed to protecting and respecting your data.

Please read this Privacy Information Notice, as it contains important information about how we use personal data that we collect from you or that you provide to us.

You do not need to take any action in relation to this Privacy Information Notice.

Who are we?

When we say ‘we’ or ‘us’ in this Privacy Information Notice, we are referring to the Trustee of the Scheme with our principal office at 3 Prenton Way, Prenton, CH43 3ET.

We are a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Information Notice.

In order to run the Scheme effectively for our members, we appoint a Scheme Actuary to calculate the value of the Scheme’s assets and liabilities based on its membership profile and to set employer contribution rates based on that information.

The Scheme Actuary is currently Martin Potter of Hymans Robertson LLP. The Scheme Actuary may need to use your personal data in relation to instructions from the Trustee or where the processing relates to their statutory or regulatory obligations. Generally, when the Scheme Actuary is using your personal information in connection with the provision of these actuarial services, the Trustee and the Scheme Actuary will be joint data controllers of your personal data. This means that the Trustee and the Scheme Actuary jointly determine how we hold and use personal information about you.

However, in limited circumstances the Scheme Actuary may be a data controller in his/her own right. In such circumstances, your personal information will only be used in connection with the provision of these actuarial services or in connection with the Scheme Actuary’s statutory or regulatory obligations.

Where the Scheme Actuary is acting as a joint data controller or data controller in his/ her own right in the provision of actuarial services, when we say ‘we’ or ‘us’ in this Privacy Information Notice we are also referring to the Scheme Actuary.

Who do we collect personal data about?

Personal data is information that can be used to uniquely identify or contact a single person. We will collect and process personal information about:

- Contributing members;
- Deferred pensioners;
- Pensioners (including those in receipt of dependants’ or spouses’ pensions);
- Former members/pensioners with no further entitlement under the scheme;
- Ex-spouse participants;
- Non-members who will or may receive benefits from the scheme (for example, on the death or divorce of a member);
- Non-members who have received benefits from the scheme and have no further entitlement;
- Non-members who have submitted enquiries;

What information do we use?

Personal data processed by us may include, but is not limited to:

- Personal details such as name; membership/reference number; address (including former addresses); contact details (including telephone numbers and e-mail addresses); date of birth; gender (including details of any gender recognition certificate); marital status (including divorce details if, for example, benefits form part of a divorce settlement); family members; beneficiary nominees; passport or identification card details; birth/adoption certificate details; and death certificate details.
- Employment records including employment history, information regarding periods of pensionable service (including periods of absence), previous salary data.
- Financial details including your bank account details (when required to pay pension due); salary information; tax and national insurance information.
- Pension information including defined benefits contributions (contributions paid to the scheme, relating to defined benefits, by or on behalf of a member); defined benefits, whether actual or potential, paid or payable to or in respect of a member; additional voluntary contribution account information; contracting-

out records; and death benefit distribution information (including expression of wish forms and information required to assess eligibility for, or allocation of, benefits to potential beneficiaries).

Special Categories of Personal Data

Only if required for the consideration and/or award of benefits, we may also collect and store 'special categories' of personal data, such as information about your health, including any medical conditions.

How do we collect your information?

We may collect personal data:

- Directly from you when you correspond with us by phone, e-mail or otherwise or when you provide us with any additional information, for example, through your on-line portal, when you attend worksite presentations, roadshows or other events;
- From third parties such as our service providers (for example, our scheme administrator), your employer or former employer (for example, when contributions are paid into the scheme), another pension scheme if you have transferred benefits, where a member includes your details in a beneficiary nominee form, from a third party in relation to an event affecting you (for example, in the event of serious ill health), or from third party agencies or publically accessible sources to try and find you when we have lost contact with you, from regulatory authorities (such as the Pensions Regulator) or government departments (such as HMRC or the Department for Work and Pensions).

How we might use your information?

We use information held about you in order to administer the Scheme. In particular, we will use personal data in order to:

- Issue communications and information (whether through us or through third parties);
- Respond to member and third-party queries and disputes;
- Calculate and pay benefits (including pensions, lump sums and transfer values) from the Scheme;
- Establish eligibility for benefits (including following divorce or death of a member, or in cases of ill health or early retirement);
- Calculate and perform a reconciliation of contributions;
- Pay tax charges and monitor whether allowances are exceeded and report to HMRC (including compliance with anti-money laundering duties, if applicable);
- Ensure compliance with contracting-out requirements;
- Prepare scheme accounts, audits and/or tPR scheme returns;
- Provide information to members through pensions dashboards programme;
- Carry out actuarial valuations and calculations;
- Decide or advise upon the investment of pension scheme assets and to implement investment decisions;
- Obtain or prepare quotes for annuities or other insurance products;
- Purchase annuities or other insurance products;
- Demonstrate our past compliance with our duties;
- Establish your identity;
- Pay fees and expenses owed; and
- Carry out the general administration functions of the scheme (for example, to ensure documentation is properly executed and drafted, Trustees are validly appointed, conflicts of interest are identified and managed and/or appropriate records are maintained).

What is our legal basis for using your information?

We must by law provide benefits in line with the Scheme's governing documents and must also meet other legal requirements when looking after the Scheme. We will use your personal data to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud. We may need to share your personal data with other people for this reason, such as courts and law-enforcement agencies.

We also have a legitimate interest in properly looking after the Scheme. This includes paying benefits as they fall due; buying insurance contracts; direct-debit instruction checks; communicating with you; and ensuring that correct levels of contributions are paid, that benefits are correctly calculated, and that the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance).

We also have a legitimate interest to provide you with a high-quality service including supporting your retirement journey and monitoring the suitability of the options you are offered at retirement. We also hold some special categories or "sensitive" data about individuals for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We will in most circumstances process this data in the performance of our legal obligations in connection with employment, social security and

social protection (as allowed by legislation). We may also, typically when considering claims under the Scheme's Internal Dispute Resolution Procedure, process any sensitive data for the purposes of establishing, exercising or defending legal claims. If there are any occasions where we seek your explicit consent to process sensitive data then you can withdraw it at any time. Sometimes your personal data may be used for statistical research but only in a form that no longer identifies you.

How long will we hold your information for?

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

Once your membership ends, we may decide to delete some of the data held in relation to you after 6 years. However, information may be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time. We review our retention periods for personal data on a regular basis.

Who we might share your information with

In order to administer the Scheme, we may from time-to-time share your personal data with various entities including: any Scheme Trustees, employers, any Scheme actuary appointed by us (currently Hymans Robertson LLP), any Scheme administrator appointed by us (currently Aptia UK Ltd), any legal adviser appointed by us (currently CMS Cameron McKenna Nabarro Olswang LLP), any employees of ScottishPower who are appointed to carry out work on behalf of or in relation to the Scheme, our professional advisers, our auditors, our insurers, HMRC, the Pensions Ombudsman, and any other service providers we use to support the Scheme who provide services including but not limited to information processing, managing and enhancing member data, providing member services, print and mailing services, investment management, cloud hosting and data analytics.

If your benefits are transferred to another scheme, we will also need to give the administrators of that scheme information about you.

Our service providers may correspond with you directly in order to provide these services. We may also disclose your personal information to third parties to:

- Comply with any court order or other legal obligation or when data is requested by government or law enforcement authorities;
- Protect the rights, property, or safety of us or others. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

International transfers of personal data. From time to time, we may transfer your personal information outside the UK and/or the EEA to service providers, subcontractors, and regulatory authorities for the purposes described in this Privacy Information Notice. If we do this, the parties will ensure appropriate legal safeguards are in place to protect your personal information.

Your rights

You have a number of rights. If you would like to exercise any of these rights, please contact us using the details set out below in the 'Contact Us' section.

Your rights include:

- Transparency over how we use your data and to make a subject access request (right of access);
- A right to have your personal data updated and corrected (right of correction/ rectification);
- A right to ask us to delete your information (right to be forgotten);
- A right to ask us to stop processing your information (right to restriction);
- A right to object to (i) processing based on our legitimate interests; (ii) processing of your information for direct marketing purposes; and (iii) automated decision making and profiling (right to object);
- A right to receive a copy of your information, or have this sent to a third party (right to data portability); and
- A right to claim compensation for material or non-material damage caused if we breach the data protection rules (right to compensation).

If you would like to find out more about your rights, you can visit the Information Commissioner's Office website

(<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>).

Security precautions in place to protect against the loss, misuse or alteration of your information We have implemented reasonable measures designed to secure your personal information from accidental loss

and from unauthorised access, use, alteration and disclosure. Details of these measures can be obtained on request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Our security measures are regularly reviewed.

Contact Us

If you have any questions regarding this Privacy Information Notice or about our privacy practices, wish to exercise any of your rights, please contact us at:

Pensions Director
ScottishPower
320 St Vincent Street
Glasgow G2 5AD
E-mail: pensions@scottishpower.com

What if you have a complaint?

To make a complaint about how the Trustee has handled your information, contact us as set out above. If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address:
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Telephone number:
0303 123 1113 or 01625 545 745

Keeping up-to-date

We may change this Privacy Information Notice from time to time. You should check this Privacy Information Notice from time to time to ensure you are aware of the most recent version. Updated versions of this Privacy Information Notice will be available on your pensions website. [Aptia OneView](#)
You can contact the scheme administrators, Aptia Limited at:

Manweb Group of the Electricity Supply Pension Scheme
c/o Aptia UK Limited
Maclaren House
Talbot Road
Stretford
Manchester
M32 0FP

Phone: 0330 808 1525

Online secure digital portal: pensionuk.aptia-group.com

This Privacy Information Notice was last updated in September 2025.