



HILTI PENSION SCHEME TRUSTEES AND PENSION SCHEME ACTUARY JOINT PRIVACY NOTICE

Your privacy is important to us. We will process your personal data in accordance with applicable data protection law.

Contact details of the data controllers

The data controllers in respect of the personal data you submit to us either directly or via your employer, Hilti (Gt. Britain) Limited, are the Trustees of the Hilti Pension Scheme (the “**Scheme**”). You can contact them via the data controller’s representative/Data Protection Officer, Peter Reynolds, by using the email address Hiltipensions@xpsgroup.com. The current XPS Pensions Scheme Actuary Wes Jones FIA and XPS Pensions Group, when providing defined benefits actuarial consulting services, are data controllers in common with the Trustees and so we share your personal information with them in order for them to provide these services. The XPS Pensions Group Privacy Information is available at <https://www.xpsgroup.com/legal-regulatory/privacy-policy/>. The relevant notice for you is labelled “Combined Scheme Actuary and actuarial consulting services to pension schemes”. We ask that you read this Privacy Information carefully. The Scheme Actuary can also be contacted by using the email address above. We use your personal data that is provided to us to administer and manage your pension and pay you or any person in respect of you the benefits provided by the Scheme.

Processing purposes and legal justification for the processing of your personal data

We process the personal data that you provide to us for the purpose of administering and managing your pension and paying you and/or your spouse and dependants’ benefits. We therefore process your personal data on the legal basis that either the processing is necessary for the performance of the contract of employment between you and Hilti (Gt. Britain) Limited regarding your participation in the Scheme, to comply with our legal obligations or further to our legitimate interests as trustees of and Actuary for the Scheme. 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.

Categories of recipients and data transfers

We will transfer your data to Hilti (Gt. Britain) Limited, other companies in its group and their advisers, the Scheme’s advisers, service providers (such as governmental agencies, regulators and authorities, courts, accountants, data storage providers) and partner organisations to the extent that it is necessary for the management and administration of the benefits provided by the Scheme. Some of the Scheme’s advisers, in particular the Scheme’s legal adviser and the Scheme auditor will be data controllers in their own right in respect of the data we share with them. If you would like further details of those advisers and how they use your personal data, please contact the Trustees via the Administration Team at Hiltipensions@xpsgroup.com.



We may also disclose your information to third parties in order to operate, administer and audit the Scheme responsibly, in the event that Hilti (Gt. Britain) Limited sells its business or assets (in which case we may disclose your personal data to the prospective buyer), in the event that we decide to de-risk or insure any of the benefits provided by the Scheme (in which case we may disclose your personal data to the prospective insurer) or where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustees, the members of the Scheme, or others. We do not use your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.

Your personal data may be processed outside of the UK or European Economic Area ("EEA") where required in order for us or Hilti (Gt. Britain) Limited to provide benefits to or in respect of you. In each instance, we have ensured that the processing of your personal data outside of the UK or EEA is protected in the same way as if it was being processed in the UK or EEA by using one of the following safeguards:

- transferring it outside of the UK to a non-EEA country with privacy laws that are recognised by the UK and the European Commission as giving the same protection as those within the UK or EEA;
- ensuring that the processing of data is governed by the EU GDPR Standard Contractual Clauses approved by the European Commission

Retention periods for and deletion of your Personal Data

We will keep your personal data stored on our systems for as long as it takes us to provide the pension and other benefits provided under the rules of the Scheme. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data. As a general rule, your personal data will be retained for as long as the Scheme continues and for 15 years following its winding-up.

Your data protection rights

Data Protection legislation gives you the right to access information held about you. Where we or third parties are required by law to obtain your consent to the processing of your personal data you are entitled to withdraw your consent. If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds. However, some data, for example data in relation to your health or personal life, is regarded as 'special categories of data' and cannot (unless a legal exemption applies) be used without your specific consent at the time. As the administrator of an occupational pension scheme, the Trustees have to process that special category data to perform their obligations under employment law and the law relating to social protection e.g. in relation to the award of benefits on death or ill-health. We understand this will be a valid legal exemption and we will not require your specific consent to process that data. To the extent that is not the case, we will ask for your consent to process 'special categories of data' but you should be aware that without that 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.



You are entitled to 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. You can exercise your data protection rights, including your rights to access, restrict, object to the processing of, rectify and erase your personal data by contacting Hiltipensions@xpsgroup.com. Please note that if you ask us to erase your personal data and we do not have a legal justification for retaining that data, we will be unable to administer your pension which will result in you and/or your spouse and dependants not receiving the pension and death benefits provided by the Scheme.

Data Protection Supervisory Authority and your right to lodge a complaint

If you are unhappy with the way in which your personal data is being processed you have a right to lodge a complaint with the Information Commissioner's Office. You can report your concerns by telephoning their help-line on 0303 123 1113 or through their website at <https://ico.org.uk/concerns>.