

Faculty of Advocates Retirement and Death Benefits Plan

Privacy Notice

This Privacy Notice has been issued by the Trustee and Scheme Actuary of the Faculty of Advocates Retirement and Death Benefits Plan (the Plan) to comply with the General Data Protection Regulation (GDPR), which came into effect on 25 May 2018, as amended by the Data (Use and Access) Act 2025, referred to as the "Data Protection" laws in this privacy notice. This document replaces any prior Privacy Notice and any Fair Processing Notice issued under the Data Protection Act 1998.

Data controller(s) and Data Protection Officer(s)

The Trustee of the Plan is the Board of Faculty Services Limited. The Scheme Actuary to the Plan is Scott Binnie of Barnett Waddingham LLP.

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustee and Scheme Actuary of the Plan are considered "joint data controllers" (the holders, users and processors of personal data) for the purposes of the GDPR. It is possible that in some circumstances other professional advisers may be considered to be data controllers. This might include the Plan's auditor or legal advisers.

The joint data controllers can be contacted as follows:

Faculty of Advocates Retirement and Death Benefits Plan
c/o Barnett Waddingham LLP
41 West Campbell Street
Glasgow
G2 6SE

Email: FacultyOfAdvocates@Barnett-Waddingham.co.uk

Telephone: 0333 11 11 222

Use, transfer and storage of personal data

In the course of running the Plan, we may require information from you in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner's) health. Such information will be used by the Plan's administrators to determine the benefits payable to you and your beneficiaries.

In addition, we may hold any or all of the following items of personal information about you:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Plan).
- Salary and data relating to investments and pension assets held outside of the Plan (to the extent they are relevant for the calculation and payment of your benefits, or to the taxation of your benefits from the Plan).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

- Information about criminal convictions if these relate to money owed to the Plan's employers in circumstances where they are entitled to be reimbursed from your benefits.

Your personal data is provided to the data controllers by your employer or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Plan. Your personal data will be stored until such time as we no longer need it but in any event for not longer than 7 years after the date the Plan is wound up.

The Trustee may share your data with the Plan's administrator Barnett Waddingham, Scheme Actuary, the sponsoring employer(s) and AVC providers. They may also share data with the Trustee's other professional advisers, service providers, consultants, and auditors. The Trustee may share your data with regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions, the Pensions Ombudsman and the Pensions Regulator).

The Trustee can share your data with the employer and the employer's professional advisers. The Trustee may also share your data with insurers for the purpose of insuring the benefits payable to you from the Plan or otherwise managing risks associated with the Plan.

Your data may be shared by the Plan's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. A comprehensive list of parties with whom data may be shared is set out in the Trustee's formal Data Mapping document, available on request in writing to the Data Controllers at the address above.

The Plan administrators, on behalf of the Trustee, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustee's **legal obligation** to run the Plan in accordance with the Trust Deed and Rules. The Trustee and / or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in your and the Trustee's **legitimate interests** to use your personal information to:

- Keep up to date and accurate records about your membership of the Plan so that the correct benefits can be paid.
- Undertake risk-management exercises so that the risk your benefits are not paid is reduced.
- Comply with the law, including regulations and guidance issued by the Pensions Regulator so that you, the Trustee and their advisers are not subject to legal sanctions which may impact benefits.
- Efficiently manage the impact of any change to the legal status of the sponsoring employer so that your benefits are not adversely affected for example by a sale or merger.

The Scheme Actuary uses your personal data to advise the Trustee on the financial management of the Plan. This advice helps to ensure the Trustee is able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

The Trustee has conducted due diligence on their suppliers to ensure they process data within the UK and/or the EEA. The data we collect from you will usually be stored inside the UK. It is possible that the trustee and the partners / staff of adviser firms may take laptops and smartphones with them on trips outside of the UK and/or the EEA, indirectly causing data to be sent outside of the EEA.

We have received guidance that as long as the information stays with the individual on the laptop / smartphone and their employer has an effective procedure to deal with security and the other risks of using laptops (including the extra risks of international travel), it is reasonable to conclude that adequate data protection exists.

If you live or work outside of the UK, we may need to transfer your data outside of the UK to respond to any queries that you may have. Where the above applies, we will take all steps reasonably necessary to ensure that data is treated securely and in accordance with this privacy notice. These transfers will be governed by the Data Protection Laws.

We may transfer data outside the UK to a country which the UK government considers ensures a level of protection that is not materially lower than UK standards. This would include countries within the European Economic Area (EEA). If the transfer is not approved by the UK government, we may only transfer data if appropriate safeguards are in place and we consider that the level of protection provided for data subjects is not materially lower than UK standards. You can contact us if you would like more information about these safeguards.

Your personal data will not be directly transferred to another country unless you request for this to be done.

Your rights in relation to your data

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. If you wish to request copies of your personal data please contact the Data Controller at the address above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to claim compensation for damages caused by a breach of the Data Protection Laws.
- You have the right to lodge a complaint about the data controller with the ICO.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustee may not be able to perform their duties in relation to the Plan, and your benefits could be affected.

If you wish to exercise any of the rights above, please let us know using the contact details set out at the end of this notice.

We will aim to respond to any request received from you within one month from your request. Access to your data will usually be provided free of charge, although in certain circumstances we may make a small charge where entitled to do so under the Data Protection Laws.

Further details about GDPR and your rights under GDPR can be found on the ICO's website at <https://ico.org.uk/>.

Your right to complain

If you are not happy with the way in which your personal information is held or processed or believe that your data protection rights have been infringed, you have the right to raise a complaint with us.

You can contact us using the contact details set out at the end of this notice.

We aim to resolve complaints as quickly as possible and within a reasonable timeframe, taking into account the nature and complexity of your complaint.

If you are not happy with our response, you can raise a complaint with the Information Commissioner's Office (ICO).

The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (<https://ico.org.uk/>). The ICO can be contacted by calling 0303 123 1113 or via its website at <https://ico.org.uk/make-a-complaint/data-protection-complaints/>

Changes to this privacy notice

This privacy notice is current as at August 2026.

We keep our privacy notice under regular review and may change it at any time. We will tell you about any significant changes.

Contact us

If you have any queries about this privacy notice, or wish to exercise any of the rights above, please contact:

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41 West Campbell Street
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August 2026