

Privacy notice for the Sainsbury's Section of the Sainsbury's Pension Scheme

The Trustee holds and processes personal data about Scheme members, beneficiaries and potential beneficiaries in order to run the Scheme. In doing so, we are a controller of the personal data and we comply with relevant data protection legislation, including the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025. This notice explains how we store and process your personal data as a member, beneficiary or potential beneficiaries of the Sainsbury's Pension Scheme, including how your data may be accessed, shared and used under lawful data access frameworks introduced by the Data (Use and Access) Act 2025. You do not need to take any action as a result of this notice.

What we do with your data

As a data controller, we collect and process your personal data so that we can fulfil our legal duty to administer the Scheme and for other legitimate purposes relating to the operation of the Scheme so we can calculate and pay your benefits. The data we hold includes your name, address, salary, service, date of birth, National Insurance number and contact details.

You have provided much of our data; we also hold and process data from Sainsbury's, Argos and other schemes from where you may have transferred, HMRC, the DWP and regulatory bodies and from tracing organisations.

You also tell us about potential beneficiaries who would be eligible to receive benefits on your death. We assume that you have their consent to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals as to do so is likely to seriously impair our ability to properly pay the benefits due under the Scheme.

We also hold some special category or 'sensitive' data about members so that we can administer the Scheme (for example, for the purposes of providing ill-health or death benefits). We will typically only do

so with your explicit consent or where there is an alternative legal basis for processing this information under data protection legislation. Where we are relying on your consent to process your sensitive data, you can withdraw it at any time. Our administrator, WTW, may use biometric data as a way of verifying identity but they will only do this with your consent. Occasionally we invite members to participate in surveys and record this feedback so that we can improve the service we provide to our members.

We ensure that all processing of personal data (including any reuse, access or sharing) is necessary, proportionate and carried out for specific, lawful purposes, with appropriate safeguards in place.

Who else processes your data?

We share your personal data with certain third parties involved in running the Scheme, for example, WTW, the Scheme Actuary and the Scheme Administrator and/or Sainsbury's as the employer supporting the Scheme. We may also share your data with pension dashboard providers and our Integrated Service Provider who help us connect to the pension dashboards.

In some circumstances we are joint controllers with WTW (as Actuary), the legal advisers, CMS (who may process your data to comply with their professional duties as advisers to the Trustee), and Sainsbury's. Sainsbury's hold your data to comply with their legal obligations as the sponsoring employers of the Scheme. They have a legitimate interest in the Scheme being run in a cost-effective way and may have an interest in offering certain options to members. We may share information with Sainsbury's and their auditors and advisers for this purpose.

The Administrator and Actuary will, from time to time, transfer data to other countries, including outside the UK. Where such transfers are made, we will ensure appropriate safeguards are in place.

Where your data is accessed or shared under statutory or regulated frameworks, we ensure it is

limited to authorised parties, used only for specified purposes and protected by appropriate safeguards.

Storage of your personal data

We store your information until such time that we will no longer need it. We regularly review retention periods, including where data has been accessed or shared.

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 keep 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 six years; however, we may hold information for longer where we consider that we need it to pay the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

WTW will hold on to your personal data for a period to be agreed with the Trustee after the termination of the contract with us. This is to protect themselves against any subsequent legal claims.

Your rights

You have the right to access your personal data and ask us to correct any errors in the data that we hold or erase your personal data. You can also request that we restrict the way we process your personal data or object to its processing. In some circumstances, you have a right to request a copy of your personal data for the purposes of transferring that data elsewhere. You also have the right to be informed about how your personal data is accessed or shared. Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However, if we do not hold all the data we need to run the Scheme, we may not be able to pay your benefits. In responding to requests, we may carry out reasonable and proportionate searches and may request clarification where necessary before proceeding.

We do not currently use your personal information to make significant decisions about you by solely automated means. We will let you know if this

changes.

Contact details

If you have any questions about this, please contact any of the Scheme's data controllers listed below:

J Sainsbury Pension Scheme Trustees Limited, J Sainsbury Plc and Sainsbury's Supermarkets Limited, Pensions Department, 33 Charterhouse Street, London, EC1M 6HA

Email: Pensions@sainsburys.co.uk

Telephone: 0345 013 0243 (Option 4)

Administrator – Sainsbury's Pension Scheme, WTW, Sunderland, SR43 4JU

Email: SainsburysPensions@wtwco.com

Telephone: 0800 916 8087

(or from outside the UK +44 (0)1737 227 587)

Actuary – James Wintle FIA, WTW, London Road, Reigate RH2 9PQ

Legal advisers – CMS Cameron McKenna Nabarro Olswang LLP, FAO Mark Atkinson, Cannon Place, 78 Cannon Street, London EC4N 6AF

What if you have a complaint about how we've handled your information?

To make a complaint about how we've handled your information, contact us as set out above. We will acknowledge the complaint within 30 days and investigate the complaint in accordance with our legal obligations.

If you're 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 Commission's Office.

Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone: 0303 123 1113 or 01625 545 745

Website: <https://ico.org.uk/make-a-complaint/>

Changes to this privacy notice

We reserve the right to modify and/or update this privacy notice at any time and will make available a copy in the case of substantive changes.