

Firth Rixson Pension Plan (the “Plan”)

Privacy Notice

This notice explains how we, Ross Trustees Services Limited, the Trustee of the Plan, use and protect the personal information that we hold about members and other beneficiaries of the Plan.

The Trustee is a "controller" for the purposes of the data protection laws. The current data protection laws are set out in the Data Protection Act 2018 and General Data Protection Regulation (we refer to these laws as the “Data Protection Laws” in this privacy notice).

What is personal information?

Personal information broadly means information that identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual.

This includes any information provided to us by or on behalf of you, the Plan's participating employers or HM Revenue & Customs in relation to your actual or potential membership of the Plan.

What types of personal information might we hold about you?

We will collect and process the information about you that you provide by filling in forms and by corresponding with us and our service providers by telephone, post, email or otherwise. We will also collect and process information about you that is provided to us by the Plan's participating employers or by HM Revenue & Customs and other government bodies. We will also receive information from you about your proposed beneficiaries, who might be eligible to receive benefits on your death. You should share this notice with your family and dependants where you have provided us with personal information about them. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them.

We may also collect information from other parties such as previous or future employers, anyone who might be entitled to benefits as a result of their connection with you, family members or personal representatives and people who have named you as a potential beneficiary in relation to their own pension benefits.

We may hold and process any or all of the following personal information about you:

- personal details such as your name, gender, age, date of birth, contact details (e.g. your address and postcode, email, telephone and mobile numbers), and identifiers such as your National Insurance number, pension or member reference number and employee number (where applicable);
- details of your family, lifestyle and social circumstances. This could include details about your current marriage or civil partnership, any previous relationships and details of your family and dependants;
- employment details such as your earnings, length of service, employment and career history, recruitment and termination details, absence record, job title and job responsibilities;
- other financial details such as about any other income, other pension arrangements, pension contribution records, bank account details (e.g. to process pension payments) and tax code;
- information about your physical or mental health (where there is a legal basis for the processing of such data under the Data Protection Laws – see below); and
- information about criminal convictions if these relate to money owed to the employer in circumstances where the employer is entitled to be reimbursed from your benefits (where there is a legal basis for the processing of such data under the Data Protection Laws – see below).

Why do we hold this information?

We hold this information because we need it to administer the Plan. Without your personal information, we cannot provide you and your dependants with the correct benefits, at the right time. For example, we may need this information to verify your membership of the Plan, to calculate your pension or to assess whether you are entitled to a specific benefit or how the tax rules apply to you.

We may use unique identifier information, such as your National Insurance number, pension or member reference number and employee number (where applicable) for the purposes of sending communications to you and verifying your identity.

In some instances, we may need to hold and process information relating to your physical or mental health, if necessary for the Trustee to determine whether you have a legal entitlement to a benefit under the Plan (such as an ill-health early retirement pension).

From time to time, we may share membership information generally with the Plan's participating employers to help with the operation of the Plan. However, this would largely comprise generic data about the Plan and personal information would not generally be shared in this way.

Using your information in accordance with Data Protection Laws

Data Protection Laws require us to meet certain conditions before we are allowed to use your personal information in the way described in this privacy notice.

We rely on a condition that allows us to use your personal information to comply with our legal obligations in relation to the Plan. There may be circumstances when we do not need your personal data in order to comply with our legal obligations, but we consider that we can rely on a condition known as 'legitimate interests' in order to use this information in the way described in this privacy notice. We have legitimate interests to collect and process your personal information as we need this to administer the Plan and to provide benefits for you and your dependants.

We will keep the amount of personal information collected and the extent of any processing to the minimum.

We will only process 'sensitive' or 'special categories' of personal information under the Data Protection Laws (e.g. information about your health) if necessary for the Trustee to determine whether you have a legal entitlement to a benefit under the Plan. We only process sensitive personal data that is relevant and proportionate to establishing whether you or your beneficiaries have a legal entitlement to a benefit under the Plan.

We will only process information about criminal convictions if these relate to money owed to the employer in circumstances where the employer is entitled to be reimbursed from your benefits and either you consent to this or the processing is necessary for the exercise of a legal claim by the employer. If you have given your consent to the processing, you can withdraw it at any time by writing to us using the contact details below.

What do we do with the information?

We may use your personal information for a number of purposes relating to the administration of the Plan, including the following:

- to calculate and pay benefits. This includes providing you with details of your benefits and options under the Plan and dealing with any queries that you have about these;
- to carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information, benefits and services that you request from us;
- to notify you about services provided to members of the Plan and any changes to those services or to enable you to access those services;

- for statistical, financial modelling, funding, accounting and reference purposes;
- for internal record keeping;
- for risk management purposes, including the insurance of the Plan's benefits;
- complying with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by any relevant regulators, government departments and law enforcement or tax authorities or in connection with any disputes or litigation; and
- in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of Firth Rixson Ltd, Firth Rixson Metals Ltd, Howmet Limited, or Howmet Products UK Limited's business.

How long do we keep your information for?

We will hold your personal information on our systems for as long as is necessary for the Plan to provide benefits to you or your dependants and for the proper administration of the Plan.

So, for example, if your pension is paid from the Plan when you retire, we will hold your information for the rest of your life, until your pension ceases on your death. If a pension is payable to any of your dependants after your death, we will continue to hold your information until their pensions cease. We will also continue to hold your information for so long as it is necessary after all benefits payable to you and your dependants have ceased, for example in case there are any further queries about your membership of the Plan or to show how the liability for your benefits was discharged.

If you cease to be a member of the Plan (e.g. because you transfer your benefits to another pension arrangement), we will hold your information for as long as you are a member and then for so long as it is necessary after you cease to be a member, in case any further queries arise about your membership of the Plan or to show how the liability for your benefits was discharged.

Who do we share the information with?

Where appropriate for the purposes of administering the Plan, we may share your information with:

- the Plan's administrators, currently Firth Rixson Limited, and Aviva in relation to DC administration services. The administrators use the information to administer the Plan, including to calculate and pay benefits;
- the Plan's professional advisers and auditors. This includes the Plan actuary (which is currently Gavin Hamill) and his employer Willis Towers Watson, the firm that provides actuarial, consultancy and investment advice to the Trustee. It also includes the Plan's legal advisers, Arc Pensions Law and auditors PwC. These organisations use the information when advising the Trustee and carrying out their respective professional obligations;
- the Plan's insurers (and other insurers for the purpose of obtaining quotations relating to the Plan or its benefits), investment managers, banks and other service providers;
- any financial adviser or other organisation appointed by the Trustee or Firth Rixson Limited to advise you about your options under the Plan or any adviser appointed by you where you have asked us to provide them with details of your benefits under the Plan;
- any other person who is authorised to act on your behalf;
- companies within the Firth Rixson Limited group and their professional advisers;

- regulators, government departments, law enforcement authorities, tax authorities and insurance companies;
- any relevant ombudsman, dispute resolution body or the courts; and
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in the Firth Rixson Ltd, Firth Rixson Metals Ltd, Howmet Limited, or Howmet Products UK Limited's business.

The entities listed above may also share personal information with their own business suppliers, for example in relation to the operation of IT systems or where they outsource part of their services.

Some of these entities may also be controllers under the Data Protection Laws. However, in the first instance you should contact the Trustee using the contact details below if you have any queries about how they use your personal information.

Some of the Plan's former service providers may continue to hold information about you for their own record keeping purposes once they have ceased to be involved with the Plan.

Where we store your personal data

The data that we collect from you will usually be stored inside the UK or the European Economic Area (EEA).

However, if you live or work outside of the UK or the EEA, we may need to transfer your personal data outside of the UK or the EEA to respond to any queries that you may have. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

We also may transfer data outside the UK or the EEA where the Plan's service providers host data outside the UK or the EEA. Where we do this, we will ensure that the transfer is to a country covered by a decision of the Commission of the European Union or is otherwise made in circumstances where appropriate safeguards are in place to protect your data in accordance with the Data Protection Laws. You can obtain a copy of the relevant safeguards by writing to us using the contact details below.

Your rights in relation to your personal information

The accuracy of the information that we hold about you is important to us. If any of the information that we hold is inaccurate or out of date, please let us know using the contact details set out at the end of this notice.

You have a number of rights under the Data Protection Laws in relation to the way we process your personal data, namely:

- to access your data;
- to have your data rectified if it is inaccurate or incomplete;
- in certain circumstances, to have your data deleted or removed;
- in certain circumstances, to restrict the processing of your data;
- a right of data portability, namely to obtain and reuse your data for your own purposes across different services;
- to object to direct marketing (although we do not carry out direct marketing);
- not to be subject to automated decision making (including profiling), where it produces a legal effect or a similarly significant effect on you (we do not use automated decision making); and

- to claim compensation for damages caused by a breach of the Data Protection Laws.

If you wish to exercise any of these rights, please contact the administrators in the first instance using FFHGroupPensions@howmet.com.

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.

We may be unable to delete or remove your data whilst we still need this to administer the Plan – see the section 'How long do we keep information for?' above.

Any complaints?

If you are not happy with the way in which your personal information is held or processed, please contact us using the details below. You also have the right to complain about data protection matters to 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. The ICO's address is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Changes to this privacy notice

This privacy notice is current as at July 2020.

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, wish to exercise any of the rights above, or have any other questions about the Plan, please contact the administrators via email in the first instance on FFHGroupPensions@howmet.com.

You can also contact the Trustee directly at firth.rixson@rosstrustees.com.

Dated July 2020
