



*ELG HANIEL METALS LTD
PENSION AND ASSURANCE SCHEME
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Privacy Notice
ELG Haniel Metals Limited Pension and Assurance Scheme
(the "Scheme")

The Trustees are responsible for the governance and administration of the Scheme. For the purposes of the General Data Protection Regulation which came into force on 25 May 2018, the Trustees are the data controller in relation to the Scheme and the Trustees are ultimately responsible for compliance with all data protection laws.

This notice sets out how the Trustees obtain, use and protect any personal data that you provide, or that is otherwise obtained or generated by the Trustees.

This privacy notice explains:

- What information the Trustees may collect about you;
- What the Trustees may use your information for;
- Who the Trustees may share your information with; and
- Your rights regarding your personal information which is held by the Trustees.

In addition to the Trustees, the Trustees' actuarial advisers, Mercer Limited ("Mercer"), and the Scheme Actuary, Mrs Emma Armstrong, are also data controllers. Mercer and the Trustees' Scheme Actuary are classed as data controllers when providing certain actuarial and consultancy services, Mercer has an appointed Data Protection Officer tasked with ensuring its compliance with data protection legislation. You can contact Mercer's Data Protection Officer (DPO) at any time if you have any questions about Mercer or its scheme actuaries' privacy practices. The DPO's details are:

Data Protection Officer
Marsh & McLennan Companies, Inc.
Tower Place West
London
EC3R 5BU

This privacy notice also covers these two data controllers.

What do you mean by personal data?

Personal data is data relating to an individual by which he or she can be identified.

What personal data do the Trustees hold?

The Trustees work to ensure that they only hold personal data to the extent that this is required. The Trustees need to hold personal data to be able to administer the Scheme and provide the correct benefits to members and their dependants. This information may include some or all of the following:

- Personal details including name, address, date of birth, gender, marital status, details of dependants and national insurance number
- Scheme membership and employment details, including period of service, salary and contributions paid
- On occasion, certain sensitive personal data may need to be held (for example medical records if a member wishes to retire early on the grounds of ill health) – if this is required your consent would be requested

Where does my personal data come from?

In addition to any data that has been provided by you, the Scheme also potentially receives or has received personal data from your employer, a former employer, HM Revenue & Customs, a tracing agency, your nominated financial adviser, your appointed representative and any previous pension provider with which you had benefits.

Why do the Trustees need my personal data?

The Trustees collect and process your data on the basis of the legal reasons set out below:

1. The Trustees must hold and process personal data about members in order to carry out their legal obligations under the Scheme's Rules and legislation, including the following obligations:
 - a. To calculate and pay the correct benefits, and deal with any queries about these.
 - b. To communicate with you about your benefits and the pension scheme.
 - c. To pay tax charges, monitor whether allowances are exceeded and report to HM Revenue & Customs.
2. It is also in the Trustees' legitimate interests to be able to use the data to administer the Scheme, for example:
 - a. To run mortality and address checks against member records to ensure information is correct and to prevent and detect fraud.
 - b. For risk management purposes, including the insurance or management of longevity risks and obtaining quotations for annuities or other insurance products.
 - c. To otherwise ensure that the Scheme is correctly managed in line with the Trustees' duty to pay the correct benefits.

The Trustees will also seek your express consent before collecting and processing certain sensitive personal data, such as medical records.

The Scheme Actuary and Mercer also hold and use some of your personal data to advise the Trustees on the financial management of the Scheme. Except where Mercer (and the Scheme Actuary) must rely on its client obtaining consent to the processing, the legal grounds Mercer (and the Scheme Actuary) rely on in order to undertake such processing are the "legitimate interests" ground, "compliance with a legal obligation" ground or "necessary for performance of a contract" ground.

How long is my personal data retained for?

The Trustees will keep your personal data, in accordance with the law and regulatory guidance, for as long as is necessary for the purpose(s) for which it was collected, in particular to enable the Trustees to administer the Scheme and pay the correct benefits, and for so long afterwards as the Trustees consider may be required to deal with any questions or complaints that the Trustees may receive about the Trustees' administration of the Scheme. When no longer needed, the Trustees will ensure that personal data is securely destroyed.

The Scheme Actuary and Mercer also keep a copy of your personal data in accordance with its document retention and deletion policies and as required by law or in order to defend any actual or possible legal claims.

Who else is my data shared with?

The Trustees will share your personal data as necessary with Mr Lee Skelton, Scheme Secretary, and with other advisers and service providers used to help administer the Scheme, for example the Scheme Actuary, administrators, legal advisers, investment advisers, auditors and accountants. The Trustees may also share your

personal data with organisations such as tracing, archiving, document printing and distribution and IT service providers. Where possible, your personal data will be anonymised before it is shared.

All such advisers and service providers have to ensure that they protect your personal data and only use your personal data in line with principles set out in data protection law. The Trustees have written agreements in place with their appointed advisers and suppliers to ensure their compliance with data protection laws and regulation. In some circumstances, the Trustees may need to pass personal data to other third parties. Where this is required, the Trustees will take reasonable steps to ensure that such third party agrees in writing to act only on their instructions and provides appropriate guarantees in respect of their security measures to protect your data.

Your personal data may be transferred by the Trustees or on behalf of the Trustees to third parties in countries outside the European Economic Area (EEA). Where that is the case the Trustees will take reasonable steps to ensure that the processing of any personal data by the third party, including the transfer to the third party, complies with EU data protection laws and regulations, including, for example, requiring the third party to agree to the EU's data protection model clauses.

The Trustees may pass personal information to other third parties at your request, for example where you are considering a possible transfer and you have asked the Trustees to provide information to your adviser and/or to the administrators of the receiving arrangement. In this situation the Trustees will assume that you have satisfied yourself that the third party has suitable security measures in place.

What are my individual rights in relation to the processing of personal data?

- Right to rectification (to have incorrect or incomplete personal data updated)
- Right of subject access (to determine what personal data is held by or on behalf of the Trustees in relation to you and to receive a copy of that personal data)
- Right to be forgotten (to have your personal data deleted or removed if it is no longer necessary for the purpose of administering the Scheme)
- Right to data portability (to obtain and reuse your data for your own purposes)
- Right to complain directly to the Trustee in accordance with the Scheme's Data Protection Complaints Policy
- Right to lodge a complaint with the Information Commissioner's Office

Please contact Sue Perks using the details below if you wish to exercise any of these rights.

Who should I contact if I have any queries?

Should you have any queries in relation to this notice or the Trustees' data protection policy, then please contact Sue Perks using the below address:

Aperam Recycling Stainless UK Ltd
Templeborough Works
Sheffield Road
Sheffield
S9 1RT

Alternatively, further information can be obtained from the Information Commissioner: www.ico.org.uk.

Updates to this notice

The Trustees may update or amend this privacy notice from time to time to comply with the law or to meet changing business requirements. Any changes made to the privacy notice will be sent to you in writing.

This privacy notice was last updated in August 2026.