

June 2026

Privacy Policy

The Bellway p.l.c. 1972 Pension Scheme (**Scheme**)

PRIVACY POLICY

1. INTRODUCTION

1.1 In this Privacy Policy:

1.1.1 references to **we, us** or **our** means BESTrustees Limited (company number 02671775), in its capacity as the trustee of the Scheme (**Trustee**);

1.1.2 references to the **Company** means Bellway p.l.c. (company number 01372603); and

1.1.3 references to **you** or **your** means any individual whose personal information we hold.

2. PRIVACY POLICY

2.1 This Privacy Policy sets out the basis on which we collect and use personal information about you in our capacity as Trustee of the Scheme.

2.2 This Privacy Policy describes in detail who is responsible for the personal information that we collect about you, what personal information we collect, how we will use such personal information, who we disclose it to and your rights and choices in relation to your personal information.

2.3 In this Privacy Policy where we use the words **personal information** we use these words to describe information that is about you and which identifies you.

3. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?

3.1 We are the data controller for the purpose of data protection law, in respect of your personal information collected and used in connection with the Scheme. This is because we dictate the purpose for which your personal information is used and how we use your personal information.

3.2 We will share your information with the Scheme's administrators and professional advisers.

3.3 The Scheme's administrator is currently Aon. When providing administration services to the Scheme, Aon acts as a data processor and processes the member data on behalf of the Trustee.

3.4 Aon also provides actuarial and consultancy services, including advice and analytics to the Trustee of the Scheme, including through the Scheme Actuary. When providing actuarial services, the Scheme Actuary, who is an employee of Aon, acts as a joint data controller with the Trustee. For more information on Aon's privacy notice, please visit: <https://www.aon.com/unitedkingdom/privacy.jsp>. The Scheme Actuary can be contacted by sending emails for the attention of Michael Brewitt to Michael.brewitt@aon.com.

4. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

4.1 We collect and use personal information about you in the course of acting as Trustee of the Scheme. The personal information we collect includes:

4.1.1 Information that you provide to us

The information that you provide to us may include the following:

- (a) contact information – your name, address, email and telephone number;
- (b) general information – your gender, marital and family status, date and place of birth;
- (c) your social security or national insurance number, passport number, tax identification number, driver's licence number, entitlement to reside in the UK or other government issued identification number;

- (d) information provided voluntarily to us (for example, preferences expressed regarding medical treatment based on religious beliefs);
- (e) details of your employer and employment history;
- (f) your bank account number, or other financial account number and account details; and
- (g) information provided by you in the course of communication with us, including by emails, letters and telephone calls.

This information may be provided:

- (a) in the course of communications between you and us (including by phone, email or otherwise); and
- (b) when you fill in forms for us (including expression of wish forms).

4.1.2 **Information we receive from other sources**

This information may include the following:

- (a) information from the Company or other group companies, each in its capacity as your employer or former employer (as appropriate);
- (b) information from the administrator of the Scheme;
- (c) information from another pension provider (if you have transferred in any other pension benefits);
- (d) information about criminal records or civil litigation history (for example, for preventing, detecting and investigating fraud); and
- (e) following the death of a member, information about that member or his potential beneficiaries for the purposes of receiving death benefits (which may come from other potential beneficiaries or from relatives, solicitors, executors, schools, etc).

5. SPECIAL CATEGORIES OF PERSONAL INFORMATION

- 5.1 We may also collect certain sensitive personal information about you.
- 5.2 You may provide us with information about your sexual orientation, in connection with establishing what benefits may be payable under the Scheme on your death or following a divorce.
- 5.3 There is the ability to retire under the Scheme, in certain circumstances, on ill health grounds. You may provide us with information about your current or previous physical, mental or medical condition, health status, injury or disability information, medical diagnosis, medical procedures performed and treatment given personal habits (for example, smoking or consumption of alcohol), prescription information, and medical history of you and your family. We may also obtain this information from medical practitioners.

6. INFORMATION ABOUT THIRD PARTIES

- 6.1 In the course of your membership of, or other involvement with, the Scheme, you may provide us with personal information relating to third parties.
- 6.2 Such information will include the personal information we collect in respect of individuals who could receive benefits on your death or following your divorce or dissolution of your civil partnership, including:

- 6.2.1 their name, address and date of birth;
- 6.2.2 their marital and family status;
- 6.2.3 their national insurance number;
- 6.2.4 information about their sexual orientation;
- 6.2.5 information about their medical history and current medical condition; and
- 6.2.6 their bank details.

You may also provide us with contact details for other third parties such as other pension providers or financial advisers.

- 6.3 We will use this personal information in accordance with this Privacy Policy. If you are providing personal information to us relating to a third party, you confirm that you have the consent of the third party to share such personal information with us and that you have made the information in this Privacy Policy available to the third party.

7. FOR WHAT PURPOSE DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?

- 7.1 We use your personal data to comply with our legal obligations as the Trustee of the Scheme and to further our legitimate interests. We also have your consent to hold certain information such as your bank account details (to allow you to receive your benefits) and details of your health (when considering applications for ill health benefits under the Scheme).

- 7.2 Where we rely on our legitimate interests to justify the purposes for which we process your personal information, those legitimate business interests will typically be one or more of the following:

- 7.2.1 complying with applicable legal and regulatory obligations and any codes of practice;
- 7.2.2 conducting a valuation of the Scheme to ensure that there are sufficient funds to meet the liabilities of the Scheme;
- 7.2.3 ensuring that the Scheme is administered in accordance with the Trust Deed and Rules;
- 7.2.4 fulfilling our disclosure requirements, including issuing summary funding statements;
- 7.2.5 notifying you of any changes to your pension benefits;
- 7.2.6 contacting you and providing information about any retirement options or transfer offers the Trustee and/or the employer make available, and/or any other de-risking exercises the Trustee and/or the employer may carry out;
- 7.2.7 processing transfer requests or quotations requested as part of a divorce;
- 7.2.8 obtaining any life assurance cover;
- 7.2.9 obtaining relevant background information when exercising any discretion under the Scheme's Trust Deed and Rules; and
- 7.2.10 complying with our obligations to notify HMRC and the Pensions Regulator of certain events.

Personal Information we may hold	How we use that information
Contact information – your name, address, email and telephone number	To communicate with you To assess and process transfer requests To notify you about changes to the Scheme and any retirement options or transfer offers or de-risking exercises.
General information – your gender, marital and family status, date and place of birth; details of your employer and employment history	To manage and administer the Scheme To prepare Scheme valuations and ensure sufficient funding To obtain costs for insuring benefits with an insurance company To enable us to decide who should receive benefits on your death
Your social security or national insurance number, passport number, tax identification number, driver's licence number, entitlement to reside in the UK or other government issued identification number	To identify you to ensure that you receive the correct amount of benefit
Information provided voluntarily to us (for example, on death benefit forms)	To enable us to decide who should receive benefits on your death
Your bank account number and details	To pay your benefit entitlement

7.3 Where we use sensitive personal information (such as medical records when considering applications for ill health benefits under the Scheme) our legal basis for doing so will either be:

7.3.1 explicit consent; or

7.3.2 because the processing is necessary for the purpose of making a determination in connection with eligibility for benefits under the Scheme and the potential beneficiary about whom the data relates is not the member.

7.4 We may be required to obtain your personal information to comply with our legal requirements or to enable us to fulfil our duties as Trustee of the Scheme. If you do not provide the relevant personal information to us, we may not be able to meet these requirements and our ability to process your benefits under the Scheme may be impacted.

8. TO WHOM MAY WE DISCLOSE YOUR PERSONAL INFORMATION?

8.1 We will share your personal information with:

8.1.1 the Scheme administrators;

8.1.2 the Scheme actuary;

8.1.3 the Company and other group companies participating in the Scheme and their advisers;

8.1.4 (where required) our professional advisers, including accountants, auditors, lawyers, investment consultants and other professional advisers that assist us in carrying out our activities as Trustee of the Scheme;

8.1.5 government authorities and agencies (such as HMRC, the Pension Protection Fund and the Pensions Regulator); and

8.1.6 other third parties such as other pension providers, insurers, intermediaries, Independent Financial Advisers, medical advisers and agents.

- 8.2 We will also disclose your personal information to other third parties, for example:
- 8.2.1 if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to fulfil our duties as Trustee of the Scheme; and
 - 8.2.2 obtaining quotations from an insurance company to secure your benefits with a recognised insurance company.

9. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?

- 9.1 The Scheme administrators or other advisers may transfer your personal information to third parties outside the UK. We will implement appropriate and suitable safeguards to ensure that such data will be protected as required by applicable data protection law. Where our administrators or other advisers transfer personal information outside the UK, this will be governed by binding corporate rules or standard contractual clauses as appropriate.
- 9.2 If you choose to send us information via the internet there is a risk because it is not completely secure. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

10. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION

- 10.1 We will keep personal information relating to you, your spouse, civil partner or other potential beneficiaries in relation to your pension benefits for many years, probably until long after your own death and any dependant's pension ceases. In practical terms, there are often occasions when a review of historical member information is necessary.
- 10.2 If you transfer your benefits out of the Scheme, we will keep a record of the transfer for a period of 75 years after the transfer (or, if earlier, until the Scheme is wound up) so as to be able to demonstrate that a transfer was made, in order to address potential queries relating to the value of your benefits.
- 10.3 We will keep any sensitive personal information only for so long as we have a legitimate reason to hold that information. For example we will hold medical information that is relevant to your eligibility to receive (or continue to receive) an incapacity pension, for as long as the pension is subject to review. Sensitive information (other than medical information) will be held for no more than 12 months unless the Trustee and the individual to whom the sensitive data relates agree otherwise.
- 10.4 In the event that the Scheme winds up, we may enter into an agreement to transfer the personal information we hold to another party (most likely to be Bellway p.l.c.) upon the wind up and our ceasing to be Trustee of the Scheme.

11. BESTRUSTEES LIMITED

The Trustee appointed to the Scheme is BESTrustees Limited, a professional trustee firm. BESTrustees Limited is also a Data Controller and will continue to be so should its appointment as Trustee come to an end. This is so that it can continue to assist with member and beneficiary queries and complaints. You can access BESTrustees' own Privacy Notice via the website at the address: www.bestrustees.co.uk/privacy-notice

12. YOUR RIGHTS

- 12.1 You have certain rights with respect to your personal information. The rights only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights by contacting the Scheme administrators Aon at Bellway p.l.c. 1972 Pension Scheme, Aon, PO Box 196, Huddersfield, HD8 1EG or via email at bellway.pensions@aon.com.

12.2 Details of how you may make a complaint to the Trustee if you consider that there has been an infringement of the UK General Data Protection Regulation (UK GDPR) in respect of your personal information are set out at section 13 below.

	Summary of your rights
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
Right to erasure of your personal information	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data portability	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances, for example where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party). You also have an absolute right to object to the use of your personal information for direct marketing purposes.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
Right to complain to the Trustee	You have the right to complain to the Trustee if you consider that there has been an infringement of the UK GDPR in respect of your personal information.
Right to complain to the relevant data protection authority	You have the right to complain to the Information Commissioner's Office, where you think that we have not used your personal information in accordance with data protection law. Details on how to make a complaint

Summary of your rights	
	to the Information Commissioner's Office can be found here: Make a complaint ICO

13. COMPLAINTS TO THE TRUSTEE

- 13.1 If you consider that there has been an infringement of the UK GDPR in respect of your personal information you may complain to the Trustee by completing a complaint form found here: [\[insert link\]](#) or requesting a hard copy from Aon at Bellway p.l.c. 1972 Pension Scheme, Aon, PO Box 196, Huddersfield, HD8 1EG. The completed complaint form should be returned to Aon at the aforementioned address or submitted by email to bellway.pensions@aon.com.
- 13.2 Aon, acting on behalf of the Trustee, will acknowledge receipt of the complaint within a period of 30 days from the date the completed complaint form is received. The Trustee will investigate the complaint without undue delay and may ask you to provide further information as part of this process. You will be informed of the progress made in relation to the complaint and the Trustee will inform you of the outcome of the complaint without undue delay.
- 13.3 If you are not satisfied with the outcome of the complaint you have the right to complain to the Information Commissioner's Office. You can, however, complain to the Information Commissioner's Office at any time.

14. CHANGES TO OUR PRIVACY POLICY

Any changes we make to this Privacy Policy in the future will be agreed at a Trustee meeting. The Privacy Policy will be reviewed on an annual basis, unless the Trustee later decides a different period is appropriate. You can request a copy of the current Privacy Policy at any time by using the contact details below.

15. QUERIES/CONTACT US

If you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact the Scheme administrators Aon at Bellway p.l.c. 1972 Pension Scheme, Aon, PO Box 196, Huddersfield, HD8 1EG or via email at bellway.pensions@aon.com.

This policy was adopted by the Trustee, June 2026.