7 July 2026

To: all members of the Bosch UK Retirement Benefits Scheme

Bosch UK Retirement Benefits Scheme: Privacy Notice

Introduction

This **"Privacy Notice"** has been issued by the Trustees of the Bosch UK Retirement Benefits Scheme (the **"Scheme"**) to all members of the Scheme, in order to comply with the forthcoming new **"General Data Protection Regulation"** (**"GDPR"**), which comes into effect on **25 May 2018**.

The purpose of this Privacy Notice is to fulfil your rights to be informed about the use of your personal data in relation to the Scheme. This is for your information only and you do not need to take any action. Please note there are no changes to your benefits or the manner in which they are paid from the Scheme.

Data controllers

In accordance with guidance issued by the Information Commission (**"IC"**) and the Institute and Faculty of Actuaries, the Trustees (in addition to the Scheme Actuary and the Scheme Auditor) are considered to be **"data controllers"** (i.e. the holders, users and processors of personal data) for the purposes of the GDPR. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it. The Trustees may be contacted at the following address:

> Address: Trustees of the Bosch UK Retirement Benefits Scheme, c/o Barnett Waddingham LLP, Chiltern Avenue, Amersham, HP6 5FG
> Email: BoschUK@barnett-waddingham.co.uk
> Telephone: 0333 111 1222

Personal data

In order to operate the Scheme effectively, the Trustees require certain personal data from you, for example, information about: your marital status, your spouse, and your state of health. This information would be used by the Scheme's pension administrators, Barnett Waddingham LLP, in order to determine the benefits payable to you and your beneficiaries. In particular, the Trustees normally hold some or all of the following personal data about you:

- Personal details including: your name; National Insurance number; sex/gender (we use this to understand how long you are likely to receive your pension for); date of birth; postal/email address; and telephone number(s).
- Details of your health – if relevant to the calculation and payment of your Scheme benefits.
- Salary and data relating to investments and pension assets outside the Scheme – if relevant to the taxation of your Scheme benefits.
- Employment history including relevant dates and historic pay records.
- Bank account details for payment of benefits and HMRC tax code.
- Whether you are married or in a civil partnership and other information we might need to pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due from the Scheme in the event of your death.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.

- Details of any contributions paid by you or on your behalf to the Scheme, including additional voluntary contributions (AVCs).
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Scheme.
- Correspondence received about you from HMRC, relating to periods of service when you may have been contracted out of the upper tier of the state pension.
- Correspondence that we may have received about you from your appointed independent financial adviser.

The Trustees may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme, or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

We also have a legal obligation to carry out due diligence checks in the event of a pension transfer request, which may mean that we are obliged to ask you for additional information. For instance:

- If you wish to transfer to an occupational pension scheme, we have to request evidence that demonstrates an "employment link". This could include a letter from your employer confirming your employment, a schedule of contributions, payslips and bank statements (the bank account detail on your payslip might be different from the bank details we hold for you).
- If you request a transfer to an overseas pension scheme, we are legally obliged to check that you are resident in the same country as that scheme. This evidence might include utility bills, TV subscriptions, insurance documents relating to your overseas home, address, bank account and credit card statements, evidence of local tax being paid and registration of address with local doctors.

Pensions dashboards

The Government has created a framework for pensions dashboards, designed to help people access information about their pensions online and in one place. As part of this, we are required by law to match certain members (who search on dashboards) with their pensions under the Scheme. We must also provide certain pensions information to the dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service) so that it can be displayed when the relevant member asks to see it on a dashboard.

These activities may involve sharing member data with entities within the dashboards ecosystem, non-commercial dashboards and commercial dashboards, and with the provider(s), the integrated service provider(s) and the administrator we appoint to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboards duties.

As part of these duties, we may also need to report information (which could potentially include personal data) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.

Where we get personal data from

Some of the information we have comes directly from you. In addition, Barnett Waddingham, who administer the Scheme on our behalf, may have obtained information from you and passed it to us. Sometimes we get information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another scheme if you have transferred benefits from that scheme; from government departments such as HMRC and DWP; and from publicly accessible sources (such as the electoral roll) if we have lost touch with you and are trying to find you. The Trustees may in turn pass this to their advisers . If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Some of your personal data may be collected indirectly through the pensions dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service). Where we obtain personal data from the dashboards ecosystem, or during the process of matching members with the Scheme benefits for dashboards purposes, we may retain that data to help demonstrate how and why we concluded that the person is a member entitled to receive information about their benefits on dashboards and to help us administer the Scheme.

Use of personal data

The Trustees must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to the running of the Scheme. The Trustees use your personal information to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud. The Trustees may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

The Trustees also have a legitimate interest in properly administering the Scheme. This includes paying benefits as they fall due, purchasing insurance contracts, communicating with you, complying with the pensions dashboards regulations, ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance).

Your personal data would usually be provided to the data controllers either by Robert Bosch Limited (the **"Company"**) or directly from you. It is not publicly accessible data. The personal data corresponds to your membership of the Scheme (and related employment) and would be stored for at least the lifetime of the Scheme.

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the majority of the personal information that we hold will be kept for a period of 15 years from the end of the Scheme year in which the last payment from the Scheme is made to or in respect of you. However, some information may be kept for a longer or shorter period depending on how long we sensibly think we need it to deal with queries (from you or your beneficiaries/other persons who might ask us if they are entitled to payments), complaints (from you or them), and our legal obligations mentioned above.

Data from the pensions dashboards ecosystem is kept for the life of your member record, if we do find a match (i.e. if you are a member of the Scheme). If we don't find a match (i.e. you're not a member of the Scheme), we will delete the data from the dashboard immediately. If we find a potential match, we will keep the data from the dashboard for 30 days in a secure form so that we have more time to determine whether there is a match or not. We will delete data after 30 days if there is no match, or keep it for the life of your member record if we do find a match.

The Trustees would generally only share your personal data with the following parties: the Trustees' professional advisers (for example: the pensions administrators, Scheme Actuary, Scheme Auditor, legal advisers, investment managers); the Company (and its professional advisers); and certain other regulatory bodies (for example: the Information Commissioner, HMRC, the DWP, the Pensions Ombudsman and the Pensions Regulator). If your benefits are transferred to another scheme, the Trustees will also need to provide the administrators of that scheme with information about you.

When the Trustees need to use information about your health, they may ask for your consent. However, sometimes there may be reasons of public interest or law which enable the Trustees to use information about your health (or other very personal information, such as details about personal relationships relevant to who should receive benefits on your death) without consent, and they will do so where that is necessary to run the Scheme in a sensible way. You can withdraw your consent at any time by contacting the Trustees using the contact details given below. This may affect what the Trustees can do for you, unless they have another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to the Trustees processing your health data for that, but then you withdraw that consent, the Trustees will usually be

unable to consider your application. If you withdraw consent after our processing, this will not retrospectively affect the processing that has already happened.

Sometimes the Trustees need to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims.

The Trustees may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Scheme.

The Trustees may need to share personal data with insurers in relation to the purchase and pricing of insurance contracts called 'annuities' (unless that can happen based on anonymised data). Insurers will use that data to verify the assets and liabilities of the Scheme. The Trustees may write to you before purchasing an annuity to ask for up-to-date information about your spouse/partner/children/other dependants, for this purpose.

The Scheme administrators[1] use your personal data to ensure that the correct benefits are paid to you (and your beneficiaries), in a timely manner, in accordance with the Scheme's Trust Deed & Rules. The Trustees and Scheme administrators may contact you directly in order to provide relevant information and help with your queries. In particular, it is in the Trustees' (and your) legitimate interests to use your personal information to:

- Keep up-to-date and accurate records of your Scheme membership to ensure the correct benefits are paid.
- Undertake risk-management exercises to ensure Scheme risks are understood an appropriately mitigated.
- Comply with the law including regulations and guidance issued by the Pensions Regulator to ensure that the Scheme is well-run in accordance with relevant legislation.

Note 1: The Scheme's administrators may share your personal data with other advisers from time-to-time in order to facilitate efficient administration of the Scheme. This may include particular outsourced activities, such as: bulk printing jobs; confirmation of members' addresses; pensioner existence exercises; offsite backup; and archive filing. A comprehensive list of parties with whom data may be shared is set out in the Trustees' formal Data Mapping document, which is available on request by writing to the data controllers at the address above.

The Scheme Actuary uses your personal data in order to advise the Trustees on the financial management of the Scheme, including the valuation of Scheme benefits and carrying out other calculations in relation to your Scheme benefits. This ensures that the Trustees are able to meet their obligations to pay members' benefits and comply with legal requirements. The Scheme Actuary will also use your personal information to comply with his own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. He may also share it with his own professional advisers, auditors and insurers, IT and data storage providers and other service providers. The Scheme Actuary[2] would not pass your personal data to any other third party without the prior agreement of the Trustees.

Note 2: The Scheme Actuary may from time-to-time use your personal data (on an anonymised basis) for actuarial research purposes. This might include, for example, the provision of anonymised personal data to the Continuous Mortality Investigation (CMI), which investigates the mortality experience of pension scheme members on behalf of the Institute and Faculty of Actuaries.

Your rights regarding your personal data

As noted above, the purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. You have the following rights regarding your personal data:

- You have the right to access your personal data, by writing to the joint data controllers at the above address.
- You have the right to have your personal data amended if it is inaccurate or incomplete.
- You have the right to have your personal data deleted if there is no legitimate reason for its continued storage and processing.[3]
- You have the right to object to your personal data being processed and restrict the processing of your personal data in certain circumstances.[4]
- You have the right to make a complaint to us (as the data controller) if you have any concerns over how we process your personal data.
- You have the right to lodge a complaint about the joint data controllers with the IC.

You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant. To exercise these rights, please use the contact details set out above.

Note 3: However, please note that if you choose to exercise your rights to withhold data (or insist on its deletion), the Trustees may not be able to fulfil their duties in relation to the Scheme and your benefits could be affected.

Note 4: If processing is restricted, the joint 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.

Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

As noted above, this Privacy Notice is provided for your information only and you do not need to take any action. If any member has any concerns or questions about this, please contact the joint data controllers at the address shown above. Further details about GDPR and your rights can be found on the IC's website at https://ico.org.uk/ or call its helpline on 0303 123 1113. If you have concerns about the way we handle your personal information, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns.

Trustees of the Bosch UK Retirement Benefits Scheme
7 July 2026