Electricity Pensions Trustee Limited, acting as Trustee of the Electricity Supply Pension Scheme
Privacy Notice for ESPS Members

Dated: 30 October 2026

The Trustee (the "**Trustee**", "**we**", "**our**", "**us**") of the Electricity Supply Pension Scheme (the "**Scheme**" or "**ESPS**"), respects your right to privacy. This Privacy Notice explains how we are provided with, share and use your personal information, and how you can exercise your privacy rights, in connection with the Trustee and its trusteeship of the Scheme.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

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We recommend that you read this Privacy Notice in full to ensure you are completely informed about your personal data. However, if you only want to access a particular section of this Privacy Notice, then you can click on the relevant link above to jump to that section.

1. What personal information will the Trustees have, from where and why?

Generally, the Trustees do not collect information directly from you. Your information is provided to us when necessary by your employer and/or the Group Trustees of your Group as part of their role in ESPS and indirectly from you and your device when you attend the Annual General Meeting (AGM). However, in limited circumstances, for example if you make a complaint directly to us, we may collect data directly from you. We only receive data from your employer and/or the Group Trustees of your Group where we need to for the purpose of managing and administering the Scheme and as set out in this Privacy Notice. We do not hold a large amount of information on you, the majority of your data is held by your employer and/or the Group Trustees of your Group. The information we process is set out in this Privacy Notice and broadly falls into the following categories:

Category of Personal Data	Description	Source
Contact Data	Personal details such as your name, date of birth, gender, contact details (i.e. address, home and mobile phone numbers, email address), national insurance number and scheme membership number.	You
Employment Data	Employment details such as your employment history (including any	You and your employer or your former employer (as

	breaks in service or where service has been transferred in), pensionable service records, salary information, contribution records.	the case may be) and/or the Group Trustees of your Group
Family Data	Details about your family and personal circumstances, such as your marital status, details of your spouse/civil partner, dependents, other family members and death benefit nominated beneficiaries.	You and your employer and/or the Group Trustees of your Group
Financial Data	Financial details such as your bank account and tax information.	You

IT Data	• Registration information provided when signing up to the Annual General Meeting (the "**Meeting**") webinar and when using online meeting platforms.
	• Device information, which may include:
	  • Your IP address (which may be used to infer broad geographic location);
	  • Device type; and
	  • Browser type.
	• Content, context, usage and analytics information from webinars.
		Indirectly through your device and online meeting platforms.

The following table provides more details on our purposes for processing your personal data and the related legal bases. The legal basis under which your personal data is processed will depend on the data concerned and the specific context in which we use it and we have set out a brief description of the legal bases relied on below.

Where we rely on legitimate interests below, this means that we may collect, use or disclose your personal data for the legitimate interests of either EPTL or a third party, but only when we are confident that your privacy rights will remain appropriately protected.

Where we rely on legal obligation below, this means that there may be instances where we must process and retain your personal data to comply with laws or to fulfil certain legal obligations.

Categories of personal data	**Purpose of processing**	**Lawful basis**
Scheme management/oversight		
• Contact Data • Employment Data • Family Data	• To contact you.	Legitimate interest – to manage and administer the Scheme.
• Contact Data	• To respond to	Legitimate interest – to manage

• Employment Data • Family Data • The content of your communication/query/complaint/dispute etc.	individual queries, complaints and disputes.	and administer the Scheme.
• Contact Data • Employment Data • Family Data • Financial Data	• To calculate, provide and assess eligibility for Scheme benefits. • To determine death benefits. • To determine and implement alternative ways of providing Scheme benefits (eg by way of a lump sum and/or Scheme pension, transfer to another scheme, the purchase of an insurance policy, a merger with another pension scheme).	Legitimate interest – to manage and administer the Scheme.
• Contact Data • Employment Data • Family Data • Financial Data	To comply with obligations arising from administering the Scheme.	Legitimate interests – to manage and administer the Scheme.
• Financial Data	To determine and manage Scheme investments and risks.	Legitimate interests – to manage and administer the Scheme.
• Financial Data	To determine and manage Scheme liabilities and funding requirements.	Legitimate interests – to manage and administer the Scheme.
• Employment Data	In connection with any corporate activity a Scheme employer may be engaged in.	Legitimate interests – to manage and administer the Scheme.
Annual General Meeting		
• Contact Data • Employment Data • Family Data	• We will use your personal data for the purposes of registering you to attend the	Legitimate interest – effective administration of the Meeting.

	Meeting. • To facilitate your virtual attendance and your interaction with other attendees at the Meeting. • To address any follow up queries arising from the Meeting. • To send out any relevant documentation ahead of or following the Meeting.	
• Contact Data • IT Data	Collecting this information enables us to utilise online meeting platforms to conduct the Meeting and for the online meeting platform operators, to operate and improve their services and to provide analytics services to the Trustees.	Legitimate interest - effective administration of the Meeting.

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2. Who do the Trustees share my personal information with?

We may disclose your personal information to the following categories of recipients:

- The Scheme administrator, **Capita** (Privacy Notice), who provide pension administration services to us**;**
- Our auditors **PwC** (Privacy Notice), investment adviser **Aon** (Privacy Notice) and professional chair of trustees **Zedra** (Privacy Notice). These parties may receive copies of your personal data where it is necessary for the effective management or oversight of the Scheme. In addition, when these parties attend or present at the Meeting, they will have access to the list of attendees to monitor for contributions from the attendees to the Meeting;
- **Our third party services providers** who provide various services to us for example, our lawyers, **Fieldfisher LLP (Privacy Notice)** , who provide legal advice and will facilitate the virtual Meeting on our behalf via their arrangements with **Zoom Communications Inc.**, which provides the online meeting platform, **Zoom**, whose Privacy Statement and Cookie Policy are available for review as IT Data may be collected using cookies and similar tracking technology;
- Our online meeting providers, including **Microsoft Teams** (Privacy Notice), who provide the online meeting platform Teams. Our regulator, the **Pensions Regulator** (Privacy Notice) with respect to management of the Scheme;

- To any **competent law enforcement body, regulator, government agency, court or other third party** where we believe disclosure is necessary (1) as a matter of applicable law or regulation, (2) to exercise, establish or defend our legal rights, or (3) to protect your vital interests or those of any other person;
- Any other person with your consent to the disclosure.

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3. How do the Trustees keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. We also require our third party service providers to process your data with appropriate technical and organisational measures.

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4. **International data transfers**

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

To administer the Scheme, it may be necessary for us to share your personal data outside the UK, eg:

- with our service providers; and
- if you are based outside the UK.

For further information, please see:

- Our Scheme administrator's, Capita, Privacy notice, who process your personal data in India and the USA.

With respect to other service providers, please see the following privacy notices for further information:

- Aon - Privacy Notice
- PWC - Privacy Notice
- Zedra - Privacy Notice
- Zoom - Privacy Notice
- Teams – Privacy Notice

We have entered into appropriate agreements with all service providers.

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5. Data retention

We will keep your personal data for no longer than is necessary for us to fulfil our legal obligations in relation to the Scheme. Given the long-term nature of a pension scheme, this means that your personal data will be kept for a long period of time, including after you have ceased to be entitled to

Scheme benefits (to deal with any queries or complaints which may arise in relation to the administration of the scheme or in the event of a legal claim to show that we have administered the trust correctly). Personal data will typically be held until the Scheme has wound-up.

We will retain personal information collected in connection with your registration and attendance at the Meeting for 2 years in case we need to contact you in relation to the Meeting, or longer where we have an ongoing legitimate Scheme need to do so, for example, in connection with the administration of the Scheme.

When we have no ongoing legitimate Scheme need to process your personal information, we will either delete or anonymise it or, if this is not possible, for example, because your personal information has been stored in backup archives, then we will securely store your personal information and isolate it from any further processing until deletion is possible.
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6. Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the "How to contact us" heading below.

- In addition, you can **object to processing** of your personal information or ask us to **restrict processing** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading below.

- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "How to contact us" heading below.

- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact the UK's Information Commissioner's Office.

- You also have a **right to complain to us** about how we have used or handled your personal data. If you wish to make a complaint to us or have any questions about this, you can contact us using the details provided under the "How to contact us" heading below.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

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7. How to contact us

If you have any questions or concerns about our use of your personal information, please contact us using the following details: Paul.Wallis@capita.com

The data controller of your personal information is Electricity Pensions Trustee Limited, ICO Registration number: Z7534192.

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8. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, regulatory, technical or organisational developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

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