

KIER GROUP PENSION TRUSTEES LIMITED

TRUSTEE TO KIER GROUP PENSION SCHEME, MAY GURNEY PENSION SCHEME, MOUCHEL STAFF PENSION SCHEME, MOUCHEL SUPERANNUATION FUND, MOUCHEL BUSINESS SERVICES LIMITED PENSION SCHEME (FINAL SALARY SECTION) AND MOUCHEL BUSINESS SERVICES LIMITED PENSION SCHEME (MONEY PURCHASE SECTION) (THE "SCHEMES")

PRIVACY NOTICE – PERSONAL INFORMATION ABOUT OUR MEMBERS AND THEIR SURVIVORS

As Trustee of the Schemes we need to collect and use personal information about our members and their survivors. This privacy notice sets out how we collect, use and protect your personal information and your rights in relation to your information.

Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

1. PERSONAL INFORMATION WE USE

We hold or will collect personal information about you from a variety of sources, including information from you directly, information provided by the Schemes' employers and information we get from other sources, including public databases.

1.1 What information may we collect directly from you?

The categories of personal information that we collect directly from you include:

- (a) personal details (for example, your name, date of birth);
- (b) your bank details and national insurance number;
- (c) your contact details (for example, your address, phone number and email address);
- (d) details about who you would like us to consider paying benefits to if you die;
- (e) your choice of fund for your contributions (and any contributions from your employer) to be paid into, where applicable.

1.2 What information may we collect from other sources (such as your employer)?

These are examples of categories of information we may collect from other sources:

- (a) personal details (for example, your name, date of birth);
- (b) your contact details (for example, your address, phone number and email address);
- (c) information necessary to calculate and pay your contributions or benefits (for example, your employment history and salary).

1.3 How will we use your personal information and why?

The ways we use your information include:

- (a) identifying you and your survivors and updating your details as may be requested by you;
- (b) communicating with you;
- (c) calculating and paying your benefits or in relation to a transfer of your benefits;
- (d) making trustee decisions – such as whether to agree to early retirement or how to distribute benefits after your death;
- (e) deciding how to invest contributions paid by you or your employer, if applicable.

We must have a legal reason to use your personal information. This will usually be one of the following:

- (f) to fulfil our legal obligations (including any contractual obligations), which includes making sure that your benefits are paid correctly;
- (g) to meet our legitimate interests to administer the Scheme efficiently;
- (h) because using the information is necessary in relation to a legal claim.

In a few cases, especially where you have given us information about your health (for example in relation to an application for ill-health early retirement), we may need your consent to process your data. Where this applies, you may take back your consent at any time by contacting the Trustee Secretary, Curtis Mitchell, Vidett, Forbury Works, 37-43 Blagrove Street, Reading, RG1 1PZ, or kgpt@vidett.com

2. **INFORMATION SHARING**

2.1 We may share personal information with:

- (a) the Schemes' administrators, our advisers (such as the scheme actuary), and other specialist providers to facilitate the administration of the Schemes and your benefits;
- (b) His Majesty's Revenue and Customs (HMRC) and other Government organisations, including potentially the Pensions Regulator and the Pension Protection Fund;
- (c) insurance companies or other occupational pension schemes and their advisers with a view to securing benefits through long term insurance policies or a merger of schemes; and
- (d) providers of pensions dashboards services (including the Pensions Dashboards Programme, dashboards providers themselves, and any service providers appointed by us or by the Schemes' administrators) to facilitate your ability to access information regarding your benefits under the Schemes via pensions dashboards.

2.2 We may also provide some of your personal information to Schemes' employer group companies to help them to make decisions relevant to their role as sponsoring employers. We will only do so to the extent we consider necessary for these purposes.

3. **SECURITY AND STORAGE**

We have in place security measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate. We cannot guarantee the security of any third party application you may use to transmit your data (e.g. internet browsers).

When sharing your personal information with our administrators or another third party we will take reasonable steps to ensure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purpose(s) we set out.

We will keep your personal information for at least as long as we have a relationship with you or your survivors. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

4. **YOUR RIGHTS**

You have rights regarding your personal information, including the right in certain circumstances to access, correct, delete or transfer your personal information or to restrict or object to our use of it. We may need extra information from you to deal with any request. If you would like to discuss or exercise these rights, please contact us.

5. INTERNATIONAL DATA TRANSFER

We may transfer and process your data outside of the UK. Where your personal information is to be transferred outside the UK (for example by the administrator) we will take reasonable steps to ensure that there are appropriate safeguards in accordance with applicable legal requirements to protect the information. For more information on any safeguards in place, please contact us.

6. CHANGES TO THIS POLICY

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. Updates are effective from the date on which they are notified to members.

7. HOW TO CONTACT US

7.1 The Trustees are the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns please contact the Trustee Secretary by email at kgpt@vidett.com, or by post:

Curtis Mitchell
Vidett Governance Services
Forbury Works
37 – 43 Blagrove Street
Reading RG1 1PZ

7.2 If you have any concerns about how we use your personal data, you may raise a complaint with us using the contact details set out above. We will investigate and respond in accordance with our complaints handling process. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters. Details of how to contact the Information Commissioner's Office are set out in the "Complaints" section below.

7.3 We encourage you to let us know if your personal information changes or if you think the information we hold about you is out of date.

11 June 2026

Complaints

If you have any concerns in relation to the way your personal data has been handled, or consider there has been any breach of the Data Protection Legislation in respect of your personal data, **you can raise a complaint to the Trustees by completing the Complaint Form at the end of this notice (see page 5) and returning it to the Trustees by post or email using the details above.**

The Trustees will acknowledge your complaint within 30 days of receipt and then take appropriate steps to respond to your complaint (and inform you of the outcome) without undue delay. If the Trustees require further information in order to consider or respond to your complaint, we will let you know as soon as possible, but this may increase timeframes for the Trustees' response.

You also have the right to raise a complaint with the UK supervisory authority for data protection, the Information Commissioner's Office (ICO). You can contact the ICO at:

Address	Information Commissioner's Office Wycliffe House Water Lane Wilmslow SK9 5AF
Website	www.ico.org.uk
Telephone	0303 123 1113

Please keep a copy of this Notice safe along with your other records relating to the Scheme.

Issued for and on behalf of:
Kier Group Pension Trustees Limited
Date: June 2026

Data Protection Complaint Form

Scheme name:	
Full name:	
Address:	
Membership information:	Membership number (if known): Date you joined the Scheme: Date you left the Scheme (if applicable):
Status (please tick):	Member (<input type="checkbox"/>) Spouse (<input type="checkbox"/>) Dependant (<input type="checkbox"/>) Other (<input type="checkbox"/>)
Personal data affected:	

Reason for complaint <i>(Please explain the reason for your complaint, the personal data affected by the complaint and any key times/events relevant to your complaint.)</i>	
Data subject rights exercised (if any) – see Section 4 of this notice.	

Below is a brief description from our pension provider, Aon, on how they use your personal data in order to support us in the running of the scheme

AON SOLUTIONS UK LIMITED “QUICK READ” PRIVACY NOTICE

Aon Solutions UK Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at

[Aon Solutions UK Limited Privacy Notice](#) or you can request a copy by contacting us, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH

20 December 2023