

Veolia UK Pension Trustees Limited

Veolia UK Pension Plan, Veolia Energy Pension Scheme

Privacy Notice

June 2026



Purpose of this notice

Veolia UK Pension Trustees Limited ("the Trustee") is committed to protecting the privacy and security of any personal information held as part of its duties when acting as Trustee of the Veolia UK Pension Plan, the Veolia UK Life Assurance Scheme, the Veolia Energy Pension Scheme and the Veolia Energy Life Assurance Scheme (together referred to here as "the Pension Plans" or "your Pension Plan").

Protecting your personal information is very important to the Trustee. As Trustee we collect and use certain information about you in connection with your membership of the Pension Plans. We are committed to using this information fairly, lawfully and transparently. In this notice we want to share with you how and why we use your personal information and some of the rights you have.

This notice applies to all members/beneficiaries/potential beneficiaries of the Pension Plans including all pensioners as well as individuals in receipt of a benefit upon the death of a member. It describes how we collect and use personal information for those individuals who are members of the Pension Plans for which Veolia UK Pension Trustees Limited acts as Trustee in accordance with the General Data Protection Regulation (GDPR).

What sort of personal information do we hold about you?

We may collect and process a variety of personal information about you and your potential beneficiaries in connection with your membership of the Pension Plans, which can be both basic and sensitive data.

Personal data, or personal information, means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed or encrypted (anonymous data).

In certain circumstances, there may be "special categories" of more sensitive personal data which require a higher level of protection.

Examples of personal information we may collect, store and use include:

- > Personal/contact details such as your name, gender, marital status including any pension sharing orders in relation to divorce, postal address, telephone numbers and email addresses.
- > ID information such as your national insurance number, bank account details, employee IDs, and passport number.
- > Employment records relevant to your membership of the Pension Plans such as salary, details of pensionable service and employment history, recruitment and termination details, attendance record (including periods of maternity, paternity or other family leave or periods of temporary absence), job title and job responsibilities, financial details such as bank account details, payroll records and tax

status information.

- > Family, details of family and dependants such as their contact details and their relationship to you.
- > Membership details such as the date of joining your Pension Plan, the section to which you belong, contribution records (including normal and additional voluntary contributions) and details about investment decisions in relation to membership of any Defined Contribution section.
- > Where relevant, details of any elections and options made in respect of the benefits to which you are entitled on retirement, death or earlier date of ceasing to be in pensionable service and details of any election to cease to be a member.
- > Details of past correspondence you have had with the Trustee and their appointed staff or advisers, including the administrators, the scheme secretary and relevant company staff with pensions responsibilities.
- > Health and disability information such as occupational healthcare information.
- > Any other personal data which may be needed to process your benefits and for the administration of your Pension Plan.
- > In respect of pension dashboards, your pension identifier (an online ticket that is used to identify you within the pensions dashboards eco system), dates of Pension Plan membership, date of birth (to enable pensions dashboards to show the time to retirement), information about how much pension you have built up already and how much you may have when you retire.
- > Sensitive information, which may include some special categories or "sensitive" data about certain individuals for the purposes of administering the Pension Plans (for example, in relation to ill-health or death benefits).

In special situations we may also collect, store and use "special categories" of more sensitive personal information where relevant to the payment of benefits of the Pension Plans. We will only collect such special category information if we need it to determine your rights and entitlement or level of benefits under your Pension Plan.

How do we obtain your personal information?

Some of this data is or will have been collected directly from you (for example, when filling in forms about your Pension Plan membership, completing an Expression of Wish form, switching investments online or when corresponding with us or our representatives by telephone, post, email or otherwise). If you visit the member website, it will automatically collect some data about you and your visit, including your IP address, your browser type and the pages on the site that you visit.

We may also collect some data from third parties. For example, from the sponsor of your pension scheme and previous administrators of your scheme. We may also occasionally obtain or have obtained data about you from other external sources (for example, HM Revenue and Customs).

In addition, we may also collect personal information during the course of your membership when a member/beneficiary or the Employer contacts us or as a result of any other engagement or correspondence that a member/beneficiary or the company may have with us. This information may reflect issues such as changes in salary, service, contributions and personal circumstances relevant to your benefit under the Pension Plans or any elections you may make.

Keep your information up to date

In order for us to comply with our legal obligations, please notify the Trustee of any changes to your personal details (e.g. address, email or other details) as soon as possible. Failure to provide it could mean we are unable to process your benefits. If you have any questions about our need for your information, please contact the Pension Plans' administrator, Isio, by sending an email to veolia@isio.com and including "GDPR" in the subject, or by calling on 0800 1223 590.

Lawful grounds for using your information

We are permitted to process your personal data, in compliance with data protection legislation, by relying on one or more of the following lawful grounds:

- > You or they have explicitly agreed to us processing such information for a specific reason;
- > The processing is necessary for compliance with a legal obligation we have; or
- > The processing is necessary for the purposes of a legitimate interest pursued by us, which might be:
 - o To provide our pensions services and manage the scheme;
 - o To prevent fraud;
 - o To ensure that complaints are investigated.
- > Where necessary for specific legitimate interests that are recognised in law. These recognised legitimate interests include public task disclosure requests, national security, public security and defence; detecting, investigating and preventing crime and/or safeguarding vulnerable individuals.

In relation to any sensitive data, we will generally rely on obtaining specific consent in order to process such information, although it may be necessary for us to use certain information in order to comply with our legal obligations as a regulated entity (such as in relation to an alleged offence).

Where you have consented to our processing of such information, you may withdraw it at any time, by contacting us. Please note that in certain circumstances, it may be still lawful for us to continue processing this information even where consent has been withdrawn.

For what purposes do we use your personal information?

As well as using your personal data where allowed by the law, we may use personal information in the following situations, which are likely to be rare:

- > Where we need to protect a member's interests (or someone else's interests).
- > Where it is needed in the public interest or it is requested from us by a statutory authority.

Some examples of how we may use your personal data include:

- > Valuing your benefits, the options available to you, the value of the Pension Plans as a whole, the levels of funding that the Pension Plans need and the investment strategy for the Pension Plans;

- > Maintaining records for the purpose of payment of benefits on your retirement (or earlier / later due to ill-health or other reasons, as requested by you and required by the Trustee as Data Controller);
- > Payment of lump sums or annuity payments. The payment(s) may be to you as a member of your Pension Plan or to your spouse, children or any other legitimate recipient, as decided by the Trustee as Data Controllers;
- > Communication of information in regards to these payments, alternatives to these payments, changes to these payments, changes to your Pension Plan, changes to the services and legislatively required information or legislative updates;
- > For HMRC purposes;
- > In relation to pension dashboard services.

How long will we hold your personal information?

We keep your personal data for as long as reasonably necessary for the proper running and administration of the Pension Plans, the performance of our legal obligations and the pursuit of our legitimate interests.

Pension schemes are, by their nature, long term arrangements and data is likely to be retained for a substantial period after the date that any benefits payable to you or your beneficiaries have ceased. General pension industry practice on data retention periods is still developing but it is anticipated that data could potentially be held for 75 years after the final benefit payment under the scheme.

We will retain personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. This means that we may continue to hold personal information after a member has opted out or ceased to have any pension benefit due under the Pension Plans.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymise personal information so that it can no longer be associated with an individual, in which case we may use such information without further notice.

Who we may share your personal information with

Using your personal information may include sharing it with third parties, including third-party service providers (such as our administrators and actuary), and the Employer and their service providers (including any subsidiary, associated or successor employing companies that are relevant to an individual's membership of the Pension Plans). Personal information data may also be shared with insurance companies (who may insure some death benefits payable under the Pension Plans or who provide annuity policies in respect of any members). Some of these third parties may also be Data Controllers.

We require third parties to respect the security of personal data and to treat it in accordance with the law. Where we share your information with other people then they will either have their own legal obligations to use your data lawfully or be required to comply with measures we put in place to protect your personal information.

We, or the third parties, may transfer personal information outside the UK and the EEA. If we or they do, you can expect a similar degree of protection in respect of your personal information.

Transferring information outside the EEA

In some circumstances, we may transfer the personal information we hold about you outside the Economic European Area or to an international organisation. When we do this we will ensure that your personal information is treated by those third parties in a way that is consistent with relevant EU and UK laws on data protection or will ensure that adequacy regulations are in place in respect of the recipient country. We may also rely on a legal exemption to transfer your personal data outside the EEA.

Data Security

It is our policy to protect your right to privacy and we will ensure that adequate technical and organisational security measures, confidentiality obligations and compliance procedures are at all times in place to prevent inappropriate use of personal data.

Under data protection laws, we and all third parties are required to implement technical and organisational security measures to ensure that personal information is protected against unlawful access. The Trustee will obtain details of these measures from all of its service providers, and will ensure that contracts with these service providers include details of the measures taken.

We are obliged to put in place appropriate security measures to prevent personal information from being lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal information to those employees and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected data security breach and will inform an affected member or any applicable regulator of a suspected breach where we are legally required to do so.

What are your rights?

You have the right to:

- > Request access to your personal information and/or information about the processing of it.
- > Require us to correct any errors in your personal information.
- > Request erasure of your personal information if there is no good reason for us to process it.
- > Request the restriction of processing of your personal information if you want us to establish its accuracy or the reason for processing it.
- > Object to processing of your personal information if we are relying on our legitimate interests to do so and you have good reason to object to this.
- > Request the transfer of personal information you have given to us to another organisation (known as data portability).
- > Withdraw, at any time, any consent that you have previously given us for our use of your personal

data.

- > Make a complaint to us or ask a question about how we handle your personal data.

To exercise your rights, please contact us by emailing pensions.vesuk@veolia.com or writing to The Trustee & Supplier Oversight Lead, Veolia Pensions Department, Veolia UK Limited, 8th Floor, 210 Pentonville Road, London, N1 9JY. Please include “GDPR” in the title of any communications you send. We will acknowledge your complaint within 30 days and investigate the complaint in accordance with our legal obligations.

Please note that not providing or withdrawing consent, or not providing the necessary information, could mean that we have insufficient evidence to assess your eligibility or continued eligibility for certain benefits.

If individuals think that we have misused personal information, or that they have been affected by a breach of data security, they have the right to make a complaint at any time to the Information Commissioner (IC), the UK supervisory authority for data protection issues. They can contact the IC by phone on 0303 123 1113, online at <https://ico.org.uk/make-a-complaint> or write to the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Changes to this notice

We may make changes to this privacy notice at any time. If we make any substantial changes we will provide you with a new privacy notice.

Where can I find further information?

You can find more information on the Veolia Member website at: <https://pensions.veolia.co.uk>.

Approved by the Board: 11 June 2026

Version Control

Version No	Revision Date	Revised by	Revision Description	Approved
1.0	May 2018	n/a	Original	17 May 2018
2.0	June 2026	S Drake / CMS	Updates to wording for compliance with Data (Use and Access) Act 2025 and to reflect developments such as Pension Dashboards	11 June 2026