



What is a Privacy Notice?

This notice explains what personal data the Trustees hold about you, how it is collected, and how the data is used and shared during your membership.

What does the Privacy Notice do?

This notice explains the Scheme's information processing practices.

It applies to any personal information you provide and any information we collect about you from other sources.

This notice is a statement of the Trustee's practices and of your rights regarding your personal information.

This is not a contractual document, and it does not create any rights or obligations on either party, beyond those which already exist under data protection laws.

Who is responsible for data processing?

The Trustee is the Data Controller of your personal data and this data is processed by the Administrator.

The Actuary is a joint Data Controller alongside the Trustee, as they require access to members' personal data in order to carry out actuarial services and fulfil its statutory and professional responsibilities.

In addition, your employer, central functions and/or units in the BASF Group also process personal data about you if and to the extent that such processing is necessary for internal processes relating to the Scheme. The company at which the central function or unit is located is responsible for data processing under data protection law.

Categories of personal data

The categories of personal data which may be processed include:

- ♦ **Master data** (gender, title, date of birth, forenames, surname, employee number, etc.)
- ♦ **Contact details** (home address, personal phone number, personal email address, etc.)
- ♦ **Family data** (marital status, name and dates of birth of spouse, etc.)
- ♦ **Employment data** (service dates, salary data, job title, employer, etc.)
- ♦ **Financial data** (bank details, tax details, etc.)



Why does the Trustee need to collect my information?

The Trustee is the Data Controller and must process your information fairly and lawfully. Your information is needed to administer the Scheme and to calculate and pay benefits. Therefore, the Trustee has a legitimate interest in holding and processing certain information about you.

The Trustee may also need to hold and process sensitive information about you and/or your dependants/beneficiaries (known as sensitive personal data). This could include, for example, information relating to your health. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

The Trustee holds personal data relating to the Scheme on paper and on computer systems, and will not collect any personal data from you that is not needed.

The Trustee needs to collect and process your personal information to:

- ♦ Be able to manage or administer the Scheme appropriately
- ♦ Be able to pay the benefits that you are entitled to under the Scheme
- ♦ Avoid breaches of legal and regulatory duties

How is personal data collected?

Typically, the Trustee collects information either directly from you or via your employer's HR and Payroll departments. Occasionally, the Trustee will receive information about you from third parties.

In certain scenarios, the Trustee may also collect personal data about you from other pension arrangements, your doctors, and from medical and occupational health professionals.

Purpose and legal basis of personal data processing

The Trustee will typically collect and use your personal data for the following purposes:

- For compliance with a legal obligation including Dashboard compliance
- For the purposes of our legitimate interests, but only if these are not overridden by your interests, rights and freedoms
- For other purposes which are compatible under the legislation

The Trustees seek to ensure that their information collection and processing is always proportionate and will notify you of any material changes to information collected.

Is my data shared with any third parties?

The Trustee doesn't disclose your information to third parties, except when required for contractual or legal reasons, for other specifically identified purposes, or if you've given your consent.

The Trustee needs help from your employer, BASF SE, various advisers, and third parties to properly administer the Scheme and to ensure the correct benefits are provided. For these reasons, the Administrator holds your data, and your information may also be shared with the Actuary (who assesses the Scheme funding level) and other professional advisers, including the Auditor and Legal Adviser.



Am I obliged to provide your personal data?

As part of your membership, you must provide such personal data as is necessary for the day-to-day administration.