

Dear Scheme Member,

MARYLEBONE CRICKET CLUB PENSION & ASSURANCE SCHEME PENSIONS ADMINISTRATION - PRIVACY NOTICE

1. INTRODUCTION

The Trustees of the Marylebone Cricket Club Pension & Assurance Scheme (the "Scheme") are collectively a "Data Controller" for the purposes of the data protection laws.

In their capacity as Data Controller, the Trustees are entitled to process the Personal Data of their stakeholders (customers, employees, shareholders, suppliers, trustees, internet users etc.) in the ordinary management of existing relations and to acquire consent if necessary. Data processing for commercial purposes is carried out only if specifically authorised by Data Subjects.

The current data protection laws are set out in the Data Protection Act 2018 and the General Data Protection Regulation as amended and transposed into the laws of the United Kingdom pursuant to the European Union (Withdrawal) Act 2018 and the European Union (Withdrawal Agreement) Act 2020. The Trustees refer to the new data protection laws as the "Data Protection Laws" in this privacy notice.

2. SCOPE OF PRIVACY NOTICE

This privacy notice sets out how the Trustees obtain, use and protect the personal information that they hold about members and other beneficiaries of the Scheme.

You should share this notice with your family and dependants where you have provided the Trustees with personal information about them.

3. WHAT IS PERSONAL INFORMATION?

Personal information is information that identifies a living individual. This would include any information provided to the Trustees by or on behalf of you, your employer or HM Revenue & Customs in relation to your actual or potential membership of the Scheme.

4. SPECIAL CATEGORIES OF PERSONAL DATA

Due to the nature of running the Scheme, the Trustees may also need to hold and process some particularly sensitive information about you and/or your dependants and beneficiaries. This is known in law as "Special Categories of Personal Data" and includes information that relates to health, racial or ethnic origin, religious or other similar beliefs,

4. SPECIAL CATEGORIES OF PERSONAL DATA CONTINUED

sexual orientation and political affiliations, which you may provide or have provided to the Trustees or the Trustees may have obtained or may obtain from other sources to the extent relevant to the administration of your benefits under the Scheme.

The Trustees will only collect this information from you when it is needed, for example information about your health if you apply to receive your benefits on the grounds of ill health. The Trustees may also record details of your relatives and/or dependants, for example, on an 'Expression of Wishes' form so that the Trustees can distribute any benefits payable on your death. Alternatively, you may nominate a certain charity or political group to receive such distribution.

Where the Trustees cannot rely on another legal basis under Data Protection Laws, you consent to the Trustees processing these types of personal data so that the Trustees can adequately provide a pensions administration service to you and the purposes set out below. Where you are providing these types of personal data about a dependant, you agree that you have provided the Trustees' privacy policy to them and obtained their consent to the Trustees' collection, processing and disclosure of their Special Categories of Personal Data as set out above.

If at any time you do not want the Trustees to process this personal data, you can contact the Trustees at the following address:

For the attention of the Trustees of the
Marylebone Cricket Club Pension & Assurance Scheme
Marylebone Cricket Club
Lord's Ground
London
NW8 8QN

You should be aware that in most circumstances the Trustees will not be able to provide these services to you and pay benefits to you or your dependants without continuing to process this personal data.

5. PERSONAL INFORMATION THE TRUSTEES MAY COLLECT ABOUT YOU

The Privacy Policy governs the use and storage of your data.

Personal details the Trustees may collect about you include:

- (a) your name, contact details (your postal address, email address, mobile and telephone numbers), gender, date of birth, occupation, description of physical or mental health and identifiers such as your National Insurance number, pension or member reference number and your employee number (where applicable);
- (b) family, lifestyle and social circumstances such as details about your current marriage or partnership and marital history, details of family and dependants;
- (c) employment details such as your pensionable pay, length of service, employment and career history, recruitment and termination details,

5. PERSONAL INFORMATION THE TRUSTEES MAY COLLECT ABOUT YOU CONTINUED

attendance records, job title and job responsibilities; financial records such as any other income, pension payments, tax code, bank account details, and other benefits;

- (d) information about criminal convictions if these relate to money owed to the employer in circumstances where the employer is entitled to be reimbursed from your benefits;
- (e) website information including your IP address; and
- (f) any information regarding your dealings with us.

6. HOW DO THE TRUSTEES USE THAT PERSONAL INFORMATION AND WHO THE TRUSTEES MAY SHARE YOUR INFORMATION WITH?

The Trustees need to use your personal information about you for various purposes set out below, including to administer the Scheme, and to calculate and pay benefits. Under the legislation, the Trustee is required to justify each purpose using a legal basis. The legal basis the Trustee usually relies on is that the processing is required to fulfil a legal obligation ("legal obligation") or that the Trustees has a legitimate interest in processing the information ("legitimate interests"). We may also process your personal information in connection with our legal claims ("legal claims").

The Trustee uses your personal information for the following purposes:-

- (a) to administer the Scheme including to process data to calculate and pay benefits;
Legal bases: legitimate interests (to enable the Trustees to perform their obligations, manage their business and provide their services to you).
- (b) to carry out their obligations arising from any agreement that the Trustees have with, or concerning, you and to provide you with the information, benefits and services that you request from us;
Legal bases: legitimate interests (to enable the Trustees to perform their obligations, manage their business and provide their services to you).
- (c) in relation to any correspondence (including queries relating to your membership of the Scheme) related to the administration of the Scheme;
Legal bases: legitimate interests (to enable the Trustees to perform their obligations, manage their business and provide their services to you).
- (d) to notify you about the Trustees' services and changes to their services;
Legal bases: legitimate interests (to notify you about changes to the Trustees' service).
- (e) to trace your most recent location in order to communicate your benefits to you;
Legal bases: legitimate interests (to enable the Trustees to perform their obligations and provide their services to you).
- (f) for statistical, financial modelling and reference purposes;
Legal bases: legal obligations, legitimate interests (to comply with statutory requirements).

6. HOW DO THE TRUSTEES USE THAT PERSONAL INFORMATION AND WHO THE TRUSTEES MAY SHARE YOUR INFORMATION WITH? CONTINUED

- (g) for internal record keeping;
Legal bases: legal obligations, legitimate interests (to manage the Scheme effectively and to ensure the Trustees have the details they need to pay benefits correctly).
- (h) for risk management including credit risk analysis;
Legal bases: legal obligations, legitimate interests (to assist with the prevention of crime and fraud).
- (i) to comply with any present or future law, rule, regulation, guidance or directive, and complying with any industry or professional rules and regulations or any applicable voluntary codes;
Legal bases: legal obligations, legal claims, legitimate interests (to comply with the Trustees' legal obligations in relation to running the Scheme).
- (j) to comply with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and complying with any subpoena or court process, or in connection with any litigation;
Legal bases: legal obligations, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities). Where the Trustees process Special Categories of Personal Data the Trustees may also rely on substantial public interest (prevention or detection of crime), legal claims, or very rarely where necessary, explicit consent.
- (k) in connection with any sale, merger, acquisition, disposal, recognition or similar change involving the Scheme. In the event that the Trustees are removed as trustees, they may need to transfer some or all of your personal information to the relevant replacement trustee or third party (and/or its advisors) as part of any due diligence process or transferred to that third party and used for the same purposes as set out in this notice.
Legal bases: legitimate interests (in order to allow the Trustees to transfer your data to replacement trustees/advisors).
Legal bases: legitimate interests (to ensure the effective management of the Scheme).
- (l) to use IP addresses to identify the location of users, to block disruptive use, to establish the number of visits from different countries.
Legal bases: legal obligations, legitimate interests (to assist with the prevention of crime and fraud).
- (m) to monitor third party administrator(s) - the Trustees may use data provided by you to monitor the performance of the Trustees' third party administrator(s), such as reviewing feedback from member questionnaires and looking into complaints.
Legal bases: legitimate interests (to ensure the service provided to members is of an acceptable standard).
- (n) to provide information to the Trustees' investment advisors - the Trustees are required to provide membership data to its investment advisers to undertake the investment work necessary for the Scheme.
Legal bases: legitimate interests (to ensure the service provided to members is of an acceptable standard).

6. HOW DO THE TRUSTEES USE THAT PERSONAL INFORMATION AND WHO THE TRUSTEES MAY SHARE YOUR INFORMATION WITH? CONTINUED

- (o) in relation to fraud prevention - the Trustees and other relevant organisations may also access and use certain information to prevent fraud as may be required by applicable law and regulation and best practice at any given time. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by the Trustees or by them.
Legal bases: legal obligations, legitimate interests (to ensure that you fall within the Trustees' acceptable risk profile and to assist with the prevention of crime and fraud). Where the Trustees process Special Categories of Personal Data the Trustees may also rely on substantial public interest (prevention or detection of crime), legal claims, or very rarely where necessary, explicit consent.
- (p) to recover debts due - to recover any payments due to the Trustees and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action (including the commencement and carrying out of legal and court proceedings).
Legal bases: legal claims, legitimate interests (to ensure that the Trustees are paid for its services).
- (q) for research and development purposes - to analyse it in order to better understand members' requirements, to better understand the Trustees' business and develop their services.
Legal bases: legitimate interests (to allow the Trustees to improve their services).
- (r) to enable the Trustees to undertake activities from time to time to help manage the liabilities of the Scheme, such as insuring Scheme liabilities with an insurer, scheme mergers, bulk transfers and benefit changes or options, including (where relevant) disclosures to the Trustees' third party advisers and service providers in relation to these activities, disclosures to administrators for calculating any offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.
Legal bases: legitimate interests (to ensure the effective management of the Scheme, to enable the Trustees to take appropriate advice and engage appropriate providers to facilitate these activities and to allow the Trustees to transfer your data to a recipient pension scheme or insurer, where applicable).
- (s) for data analysis and machine learning purposes and/or to test the systems of service providers - the Trustees may remove identifiers from your personal data and use that data for the purposes listed above. The Trustees may also remove identifiers from your personal data and disclose it to third parties, including to their advisors and service providers.
Legal bases: legitimate interests (to allow the Trustees to develop their services and operate and improve the Scheme in an effective, efficient, legal and secure manner.)

Personal Data relating to the Scheme is held on paper and on computer systems. As the Data Controller, the Trustees must process this information fairly and lawfully.

6. HOW DO THE TRUSTEES USE THAT PERSONAL INFORMATION AND WHO THE TRUSTEES MAY SHARE YOUR INFORMATION WITH? CONTINUED

The administration of your pensions benefit is provided by Deloitte Total Reward & Benefits Limited (Deloitte) for the defined benefit element and Legal & General Investment Management (Legal & General) for any defined contribution element that you may have. To calculate your entitlement to any benefit under the Scheme all information above will be processed by Deloitte and/or Legal & General accordingly. Previous administrators of the Scheme may retain your personal information to defend any potential litigation that arises as a result of their historic processing activities.

In addition to the scheme administrator and Marylebone Cricket Club (as your employer or former employer), the Trustees may at times be required to share your data with other third parties (and justifies this sharing on the basis of legal obligations and legitimate interests (to enable the Trustees to perform their obligations, manage their business and provide their services to you). Examples of this include:

- (a) As part of the Trustees' financial due diligence auditing firms will be employed to audit their records.
- (b) Tracing services may be used to prove your most recent location to communicate to you your benefits.
- (c) Secure storage firms will be used to securely store any physical information produced whilst administrating the scheme.
- (d) Payroll providers may be used to calculate and pay your pension.
- (e) AVC Fund providers where applicable will keep personal information to maintain any additional benefit you accrue.
- (f) Scheme Actuary, advisers (including investment advisers and legal advisers).
- (g) Annuity providers may be engaged to pay your pension benefits. For the provider to calculate any entitlement they will need personal information and, in some circumstances, sensitive personal information. Details of this will be provided at the time.
- (h) Third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so.
- (i) Insurance or reinsurance companies in the event that the Trustees seek to insure the Scheme liabilities with an insurer.
- (j) Other third party service providers including but not limited to providers of printing and communication services, debt collection services and third parties engaged to facilitate the activities outlined in the "purposes" section above (for example, scheme mergers, benefit changes/options and bulk transfers).

7. TRANSMISSION, STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION

Security over the internet

While no data transmission (including over the Internet or any website) can be guaranteed to be secure from intrusion, the Trustees maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

All information you provide to the Trustees is stored on their and/or their subcontractors' secure servers and accessed and used subject to its security policies and standards. If the Trustees have given you (or where you have chosen) a password which enables you to access certain parts of their and/or their subcontractors websites, you are responsible for keeping this password confidential and for complying with any other security procedures that they or their subcontractors notify you of. The Trustees ask you not to share a password with anyone.

Export outside the UK

Your personal information may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the UK in which data protection laws may be of a lower standard than in the UK. Regardless of location or whether the person is an employee or contractor the Trustees will impose the same data protection safeguards that they deploy inside the UK.

Certain countries outside the UK have been approved by the UK Secretary of State as providing essentially equivalent protections to UK data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions (see the full list hereon the ICO's website at <https://ico.org.uk/>). In countries which have not had these approvals, the Trustees will either ask for your consent to the transfer or will transfer it subject to approved contractual terms that impose equivalent data protection obligations directly on the recipient unless the Trustees are permitted under applicable data protection law to make such transfers without such formalities.

Please contact the Trustees using the contact details below if you would like to see a copy of the specific safeguards applied to the export of your personal information.

8. HOW LONG DO THE TRUSTEES KEEP PERSONAL INFORMATION FOR?

The Trustees need to hold and process information about you to administer the Scheme, and to calculate and pay benefits. The Trustees will not collect any Personal Data from you that they do not need.

To correctly administer the Scheme, the Trustees need to be able to prove what benefits you were entitled to under the Scheme and what has happened to this benefit.

The Trustees will retain your personal information for as long as is necessary for the processing purpose(s) for which they were collected and any other permitted linked purpose (for example the Trustees will usually retain personal data up until the later of the death of the beneficiary or dependant (as applicable) plus six years). If information is used for two purposes the Trustees will retain it until the purpose with the latest period expires but the Trustees will stop using it for the purpose with a shorter period one that period expires.

The Trustees restrict access to your personal information to those persons who need to use it for the relevant purpose(s). The Trustees' retention periods are based on business needs and your information that is no longer needed is either irreversibly anonymised (and the anonymised information may be retained) or securely destroyed.

9. WHAT ARE YOUR RIGHTS?

- (d) All Data Subjects can exercise their right of access and know what Personal Data is held about you or someone else on your behalf, their origins and how they are used.
- (d) If you believe that the Personal Data the Trustees hold about you is inaccurate, you can request to have it the data to be updated, rectified, supplemented or deleted.
- (d) You can instruct the Trustees to restrict the processing of your Personal Data in certain circumstances, for example, whilst an accuracy issue is being resolved.
- (d) You can ask the Trustees to transmit the personal data you have provided to the Trustees and which the Trustees still hold about you to a third party electronically.
- (d) You can object to your Personal Data being processed, unless the Trustees' reasons for undertaking that processing outweigh any prejudice to your data protection rights.
- (d) Where you have given the Trustees your consent to processing your Personal Data, you can withdraw that consent at any time by notifying us.
- (d) You can request that your Personal Data is deleted altogether where the Trustees no longer have a lawful ground to use it.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights we will check your entitlement and respond in most cases within a month. Information will generally be provided to you free of charge, although the Trustees can charge a reasonable fee in certain circumstances. You should be aware that taking certain of the steps above steps could impact on the payment of your benefits, the ability for you to build up benefits and the Trustees' ability to answer questions relating to your benefits.

10. WHO TO CONTACT ABOUT PERSONAL INFORMATION?

If you have any questions, comments, or requests or if you wish to see your Personal Data, exercise any of your rights mentioned above or make a complaint about how the Trustees have handled your Personal Data, please contact the Pension Trustees at pensions@mcc.org.uk. Your complaint will then be investigated and the Trustees will work with you to resolve the matter.

11. MAKING A COMPLAINT TO THE INFORMATION COMMISSIONER'S OFFICE (ICO)

If you are still not satisfied with the Trustees' response to any query raised with us, or you believe that your personal information has not been handled in a way appropriately according to the law, you can complain to the ICO. Their helpline number is 0303 123 1113. Alternatively, the ICO can be contacted at the following address:

Information Commissioner's Office (Head Office)
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF

You also have the right to contact the data protection regulator in the EEA country in which you are based. A list of the data protection regulators and their contact details can be found at http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

12. CHANGES TO THE TRUSTEES' PRIVACY NOTICE

The Trustees' Privacy Notice may change from time to time in the future. If the Trustees change the uses of your information they will provide an update to this Privacy Notice to you.

This Privacy Notice came in to force on 12 October 2022

Further notices highlighting particular uses the Trustees wish to make of your personal information together with the ability to opt in or out may also be provided to you when the Trustees collect certain personal information from you.

Yours sincerely,



John Nestor on behalf of The Trustees of the Marylebone Cricket Club Pension & Assurance Scheme