

Privacy notice – Lazard London Staff Pension Scheme and Lazard London Directors' Pension Scheme

The Trustees of the Lazard London Staff Pension Scheme and Lazard London Directors' Pension Scheme (each, a "Scheme") are committed to protecting your information and acting in accordance with your rights under all applicable laws and regulations from time to time in force relating to data protection and privacy, including (to the extent applicable) the General Data Protection Regulation ("GDPR").

Collection of your information

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, telephone numbers and e-mail addresses, national insurance number, bank account details (in some cases), and country of residence;
- information relating to your benefits, including your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your employment history, your earnings, the category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- in some cases, special categories of personal data such as your marital status, or information concerning your physical or mental health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Where applicable, we also collect information about your nominated beneficiaries, dependents or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

In some cases, this information is collected directly from your (current or former) Scheme employer and from our service providers, such as Premier Pensions Management Limited (Premier) who were appointed as administrators with effect from 1 September 2019 (replacing Capita).

How we use your information

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, to establish the identity of members and their eligibility for benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other schemes;
- b) for general administration of the Scheme, including: to record and pay benefits; for actuarial valuations and calculations; to prepare scheme accounts and assist the Trustees' auditors; to calculate and pay tax; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you or to prevent fraud;
- c) for meeting our on-going regulatory, legal and compliance obligations, such as reporting to relevant authorities and governing bodies and investigating or preventing crime;
- d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme; and
- e) when we undertake activities from time to time to help us manage the liabilities of the Scheme, such as the insurance or management of longevity risks, including modelling and hedging, scheme mergers, bulk transfers, pension increase exchanges and enhanced

transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) necessary for our legitimate interests in pursuing the purposes set out in (a) to (e) above, and (when we make the disclosures to Lazard for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of Lazard, such interests in each case not being overridden by your privacy interests;
- (ii) required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below;
- (iii) in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and
- (iv) in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits or where the Scheme Rules require you to provide information which we cannot otherwise process without your consent.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to record, calculate or pay your or your beneficiaries' benefits.

Disclosures of your information

We may share your information with the following recipients:

- our suppliers, including Premier (the current Scheme administrators), Lazard and other providers of services to us and them, such as financial advisors (to provide you with financial advice), legal advisers, investment managers, payroll providers (to record and pay benefits), and printing, communication, IT and hosting and tracing providers (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);
- the Scheme Actuary, Jeremy Dell of Lane Clark & Peacock LLP, (for actuarial calculations), who is also a data controller with respect to your personal data that he uses to carry out his functions. For further information please see: <https://www.lcp.uk.com/privacy-policy/>.
- Lane Clark & Peacock LLP, as investment and actuarial consultants, such as for providing advice to the Trustees;
- Barnett Waddingham, such as for providing Scheme Secretarial support to the Trustees;
- Lazard, such as for audit purposes or in relation to corporate transactions initiated by Lazard;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (e) above;
- public authorities, regulators or government bodies (such as the Pensions Regulator and HM Revenue & Customs), including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and

- other persons from time to time, such as the Pensions Ombudsman and the Pensions Regulator, when the disclosure is needed to exercise or protect legal rights, including those of the Trustees or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Transfers of your information abroad

The Trustees do not transfer your information outside of the European Economic Area (EEA). Where your personal data is transferred to a third party who is a data controller, any further transfers made by them are subject to their own privacy policies.

Retention of your information

We will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within our retentions management documentation. We determine the period envisaged within such documentation with regard to the Scheme's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Scheme, and responding to legal claims or regulatory requests.

Your rights

You have rights under data protection law of access to and rectification or erasure of your personal data and to restrict or object to its processing, to tell us that you do not wish to receive marketing information, and (in some circumstances) to require certain of your information to be transferred to you or a third party. If you have any questions or wish to exercise any of the above rights, you can contact us at the details set out below.

You also have the right to withdraw your consent to the use of your information, to the extent such use is based on your consent.

You can also lodge a complaint about our processing of your personal information with the office of the Information Commissioner (www.ico.org.uk) or, if you are no longer resident in the UK, the relevant data protection authority in your country of residence.

Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

Status of this privacy notice

We keep our privacy policy under regular review. This privacy notice was reviewed in August 2022. It is non-contractual. We reserve the right to amend it from time to time.

Trustees of the Lazard London Staff Pension Scheme and Lazard London Directors' Pension Scheme

Contact:

Bryna Brady, Secretary to the Trustees, c/o Tim Springhall, Lazard and Co Ltd, 50 Stratton Street, London W1J 8LL

Email: LazardPension@Barnett-Waddingham.co.uk