

TUI GROUP UK Pension Trust: Data Privacy Notice

TUI GROUP UK Trustee Limited (“we”, “our” “us”), the trustee of the TUI GROUP UK Pension Trust (the “Trust”), is committed to protecting your information and acting in accordance with your rights under data protection law.

This privacy notice contains information on:

- what personal information about you we collect;
- what we do with this information;
- the lawful basis on which personal information is processed; and
- what rights you have.

1 Collection of your information

We collect and process the following information about you:

- 1.1 your personal details such as your name, sex, date of birth, home address (including postcode), telephone number, e-mail address, national insurance number, bank account details (in some cases), marital status, dependants and country of residence;
- 1.2 information relating to your benefits such as your member identifying number (which is assigned to you by us), the date you joined or left the Trust, your earnings and pensionable earnings, benefit options you have selected, the category and value of benefits that you have built up or receive and relevant matters impacting your benefits such as voluntary contributions, pension sharing orders (including information in divorce or dissolution certificates), tax protections or other adjustments;
- 1.3 records of communications with you (including any complaints); and
- 1.4 in some cases, special categories of personal data such your marital status or information concerning your 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, dependants or next of kin (for example, when you submit an expression of wish form). **Before providing us with any such information, you should provide a copy of the information in this notice to those individuals. We assume that you have the right to share any personal information you provide to us about them.**

In some cases, we will collect personal information about you indirectly from the TUI Group entity which is (or was) your employer and from our service providers (e.g. our administrators (which currently are Equiniti and the TUI Pensions Department based at Wigmore Place in Luton).

2 How we use your information

We use your information for the following purposes:

- 2.1 communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other plans;

- 2.2** for general administration of the Trust, such as: to record and pay benefits (including implementing benefit options you have selected); for actuarial valuations; for selecting member nominated trustee directors; for providing you with news about the Trust; 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 and to prevent fraud;
- 2.3** for meeting our on-going regulatory, legal and compliance obligations including Pension Dashboards requirements, and investigating or preventing crime;
- 2.4** 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 Trust; and
- 2.5** when we undertake activities from time to time to help us manage the liabilities of the Trust, such as, longevity hedging, insuring Trust liabilities with an insurer, Trust mergers, bulk transfers, pension increase exchanges, flexible retirement options 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:

- 2.6** necessary for our legitimate interests in pursuing the purposes set out in paragraphs 2.1 to 2.5 above, and (when we make disclosures to the TUI Group for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of the TUI Group, such interests in each case not being overridden by your privacy interests;
- 2.7** in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies referred to below; or
- 2.8** 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
- 2.9** 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 Trust 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 either:

- (i) meet our legal or regulatory obligations; or
- (ii) record, calculate or pay benefits to you, or your nominated beneficiaries,

then, if we cannot collect or continue to use this personal data, we may be unable to administer your contributions and benefits, or record, calculate or pay your benefits and/or the benefits due to your beneficiaries.

3 Disclosures of your information

We typically share your information with the following recipients:

- 3.1** our suppliers and other providers of services who use the information on our instructions; we use service providers to administer the Trust on our behalf (currently the TUI Pensions Equiniti, Standard Life, financial advisers (to provide you with financial advice), annuity advisers (currently Hargreaves Lansdown), payroll providers (to record and pay benefits), medical practitioners in relation to ill-health early retirement applications (currently Medigold) providers of printing communication, IT and hosting services (Equiniti) tracing services (currently Lexis Nexis) and providers who invest your additional voluntary contributions (Wesleyan and Prudential).
- 3.2** our professional advisers to obtain actuarial and investment advice (currently Lane, Clark & Peacock LLP), legal advice (currently Linklaters LLP), trustee secretarial services, and consultancy advice (currently Aon Solutions UK Limited) and audit services (currently RSM LLP).
- 3.3** the TUI Group, such as for audit purposes, in relation to corporate transactions initiated by the TUI Group from time to time;
- 3.4** any new pension provider you select, if requested to do so by you;
- 3.5** insurance and reinsurance companies, such as when we carry out the activities referred to in paragraph 2.5 above. This includes, in particular, Legal & General Assurance Society Limited who is the insurer counterparty to the bulk purchase annuity policies purchased by the Trustee in April 2021 and December 2024 for the BAL Scheme and the TAPS Scheme;
- 3.6** public authorities, regulators or government bodies, including when required by law or regulation (Pensions Dashboards), under a code of practice or conduct, or when these authorities or bodies require us to do so. This may include the Pensions Regulator, HM Revenue & Customs and the Department for Work and Pensions; and
- 3.7** other persons from time to time when the disclosure is needed to exercise or protect our legal rights, including the rights of other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others. This may include the Pensions Ombudsman, the police or by order of the court if, for example, there is suspected or actual criminal activity involving the Trust.

Please note that when we share information with our suppliers and service providers, we take steps to ensure they meet our data security standards, so that your personal data remains secure.

4 Transfers of your information abroad

The use and disclosure of your information for the purpose referred to in paragraphs 2.1 and 2.5 above may involve transferring your information to countries outside of the United Kingdom (UK) or the European Economic Area (EEA). Those countries include India.

In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected in compliance with applicable data protection rules. To ensure an appropriate level of protection, for example a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) relevant

authority in the UK. Further details of these transfers and copies of these agreements are available from us on request.

For the avoidance of doubt, if you live outside the UK or the EEA we will transfer your information outside the UK or the EEA in order to pay your benefits. If this is relevant to you, we may also transfer your information outside the UK or the EEA in order to trace you if we lose contact with you, or to confirm your continuing entitlement to benefits. We will ensure that we continue to protect your information in these cases.

5 Retention of your information

We will keep your information for the longer of: (i) the period required in order to meet our legal or regulatory responsibilities; and (ii) the period envisaged within our data retention policy.

We will decide the retention period having regard to the Trust'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 Trust; and responding to legal claims or regulatory requests. In many cases, we will keep your information for 12 years after ceasing entitlement to benefits.

6 Your rights

You have rights under data protection law to access and correct your information and (in some circumstances) to restrict its use or have it deleted.

In some circumstances, you also have the right to object to the processing of your information and to require certain personal data to be transferred to you or a named third party.

You can exercise any of these rights by contacting us at the address set out below.

There is generally no charge to you to exercise any of these rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (i) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (ii) refuse to act on the request.

As set out in paragraph 2.9 above, in limited circumstances your personal data is processed on the basis of your consent. To the extent this applies, you have the right to withdraw your consent to the use of your information. You can notify us of your withdrawal of consent by contacting us at the address set out below.

You can also lodge a complaint about our processing of your personal information with a supervisory authority in the Member State where you habitually reside or work, or where a breach has taken place. Details for the office of the Information Commissioner in the UK are available at www.ico.org.uk.

7 Further information required to carry out requests

In some cases, it will 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.

8 Status of this privacy notice

This privacy notice was last updated on 16 September 2025.

This document is a notice to you and not a contract between us. It may be subject to amendments from time to time. To find more information on how Lane, Clark & Peacock LLP handle your information, as Scheme Actuary, please visit:

<https://www.lcp.uk.com/privacy-policy>

Any future changes or additions to our processing of personal data (as described in this privacy notice) which affect you will be brought to your attention in a way which is appropriate, having regard to the way in which we normally communicate with you.

To contact us about the matters set out above, please send your correspondence to:

The Trustee Secretary, TUI GROUP UK Trustee Limited, Wigmore Place, Wigmore Lane, Luton, Bedfordshire, LU2 9TN or by email to tui_pensions@tui.co.uk.