

The Football Association Limited Retirement Benefits Scheme - Privacy Notice

This Privacy Notice has been issued by the Trustees of the Football Association Limited Retirement Benefits Scheme (the Scheme) to comply with UK data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended from time to time, including by the Data (Use and Access) Act 2025. This document replaces any Fair Processing Notice issued under the Data Protection Act 1998.

Data controllers

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustees, the Scheme Actuary, Robert Sweet of Cartwright Group Ltd, the Scheme consultants, Barnett Waddingham LLP, the Scheme Auditor, Assure UK, and the Scheme's legal advisers, JMW Solicitors LLP, are considered "joint data controllers" (the holders, users and processors of personal data) for the purposes of the UK GDPR. Aviva is also considered a data controller in its capacity as bulk annuity provider to the Scheme.

The Trustees of the Scheme are currently: Zedra Governance Limited (represented by Phil Clark, Chair), Alan Broadbent, Kevin Mclvor, Carolyn Round, Andrew Hailwood and Ruaidhri Dunn.

The joint data controllers can be contacted by writing to: Chair of the Trustees of the Football Association Limited Retirement Benefits Scheme, Wembley Stadium, Wembley, London, HA9 0WS, or by email to phil.clark@zedra.com.

Use, transfer and storage of personal data

In the course of running the Scheme, we may require information from you in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner's) health. Such information will be used by the Scheme's administrators to determine the benefits payable to you and your beneficiaries.

Some of the personal data that the Trustees collect and process may include data concerning your health and sexual orientation. The purpose of processing this data relates principally to your expression of wishes regarding the benefits payable to someone in the event of your death, and applications that are made for benefits which are conditional on your state of health.

In addition, we may hold any or all of the following items of personal information about you:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Scheme).
- Salary and data relating to investments and pension assets held outside of the Scheme (for example to the extent they are relevant in relation to taxation of your pension income).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

Your personal data is provided to the data controllers by the Football Association Limited who in those circumstances will be a data controller, or its subsidiaries or may be obtained directly from you. It is not publicly

accessible data. The personal data collected relates to your employment and membership of the Scheme. Your personal data will be stored for at least the lifetime of the Scheme.

The Trustees share your data with the Scheme's administrator, Barnett Waddingham LLP, the Scheme Actuary, the sponsoring employers (Football Association Limited, National Football Centre Limited and Wembley National Stadium Limited), the bulk annuity provider (Aviva) and the Final Salary AVC provider (Aviva). They may also share data with the Trustees' other professional advisers (including the Scheme Auditor, legal advisers and pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator) or insurance companies (for example, where obtaining a quotation for insuring benefits outside of the Scheme).

The Trustees may share your data with the sponsoring employers for the purposes of providing information to the members about access to the pension freedoms or other incentive exercises.

Your data may be shared by the Scheme's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. A comprehensive list of parties with whom data may be shared is set out in the Trustees' formal Data Mapping document, available on request in writing to the data controllers at the address above.

The Scheme administrators, on behalf of the Trustees, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustees' **legal obligation** to run the Scheme in accordance with the Trust Deed and Rules. The Trustees and / or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in your and the Trustees' **legitimate interests** to use your personal information to:

- Keep up to date and accurate records about your membership of the Scheme
so that the correct benefits can be paid
- Undertake risk-management exercises
so that the risk your benefits are not paid is reduced
- Comply with the law, including regulations and guidance issued by the Pensions Regulator
so that you, the Trustee(s) and their advisers are not subject to legal sanctions which may impact benefits
- Efficiently manage the impact of any change to the legal status of the sponsoring company
so that your benefits are not adversely affected for example by a sale or company merger

These legitimate interests are not overridden by your interests in maintaining the privacy of personal data, but the Trustees will ensure that processing goes no further than what is required to secure those legitimate interests.

The Scheme Actuary uses your personal data to advise the Trustees on the financial management of the Scheme. This advice helps to ensure the Trustees are able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Trustees are also under a legal obligation to provide personal data in some circumstances to HMRC and to the Pensions Regulator. When they do, the lawful basis for the processing is that legal obligation.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustees.

The Trustees have examined the joint data controllers' and processors' data security policies and are satisfied with them. The joint data controllers and processors have contractual or other documented legal obligations which ensure that they are followed.

Reporting data security breaches

The Trustees have contractual arrangements in place with their joint data controllers and processors which require them to report any breach of data security to the Trustees as soon as they become aware of it. The Trustees are aware that they also need to report any breach of which they are aware as soon as they become aware of it.

On receiving a breach report, the Trustees will consider whether the breach is likely to result in a risk to your rights and freedoms.

Breach reports will be dealt with urgently, with a view to making a breach report to the Information Commissioner's Office, where necessary, within 72 hours of the breach occurring wherever possible.

If a data breach may compromise your rights or freedoms you will be informed without delay. The decision whether or not to inform you will be made at the same time that the decision is made whether or not to report the breach to the Information Commissioner's Office.

All breaches are recorded by the Trustees.

The Trustees have conducted due diligence on their suppliers to ensure they process data within the UK and/or the European Economic Area. It is possible that the trustees and the partners / staff of adviser firms may take laptops and smartphones with them on trips outside of the UK and/or the EEA, indirectly causing data to be sent outside of the EEA.

We have received guidance that as long as the information stays with the individual on the laptop / smartphone and their employer has an effective procedure to deal with security and the other risks of using laptops (including the extra risks of international travel), it is reasonable to conclude that adequate data protection exists.

Personal data which is stored in hard copy by the Trustees is stored in locked filing cabinets. They are only accessible by the Trustees or by other parties expressly authorised to do so.

Personal data will not be transferred outside the UK unless there is a lawful reason to do so and appropriate safeguards are in place, or the transfer is otherwise permitted under UK data protection law.

Your personal data will not be directly transferred to another country unless you request for this to be done.

Your rights in relation to your data.

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. If you wish to request copies of your personal data please contact the data controllers at the address above. When responding to a request, the data controllers will carry out reasonable and proportionate searches for the personal data covered by your request. We may ask you for information to help us confirm your identity and/or to clarify what information you want. If we need clarification to locate the data you are requesting, the time period for responding may be paused while we wait for your reply.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You can raise a complaint about the way your personal data has been handled by contacting the data controllers using the details above. The Trustees will handle complaints in accordance with their data protection complaints process and without undue delay. You also have the right to lodge a complaint with the ICO.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustees may not be able to perform their duties in relation to the Scheme, and your benefits could be affected.

Further details about UK GDPR and your rights under UK GDPR can be found on the ICO's website at <https://ico.org.uk/>.