

# Harsco Pension Scheme Privacy Notice

Last updated: [●] March 2026

The Trustees of the Harsco Pension Scheme (“**Scheme**”) are committed to protecting your information and acting in accordance with your rights under data protection law.

This Privacy Notice explains what information we collect and use about you and the reasons for doing so. It also describes the third parties we share this information with, your data protection rights and the steps we take to protect your privacy.

## 1 What information we collect about you

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address including postcode, national insurance number, bank account details (in some cases), and country of residence (“**Personal Details**”);
- 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 earnings, the category and value of contributions and benefits that you receive, your target retirement age, and any relevant matters impacting your benefits such as additional voluntary contributions, pension sharing orders (including information in divorce or dissolution certificates), tax protections or other adjustments (“**Benefit Information**”);
- records of communications with you (including any complaints) (“**Communications Records**”); and
- in some cases, special categories of personal data such as 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), and (in exceptional cases) information relating to convictions or offences (e.g. in the case of liens) (“**Special Categories of Data**”).

In some cases, this information is collected directly from your employer.

We also collect information about your dependents or next of kin (for example, when you submit a nomination of beneficiary form, or where we collect marriage and birth certificates on a benefit event, such as at retirement or when deciding how to distribute death benefits) (“**Beneficiary Information**”). You should therefore provide a copy of the information in this notice to those individuals.

## 2 Our legal basis for processing

Data protection law requires us to have a lawful ground, or reason, for processing personal information. We process your information on the basis that it is:

- necessary for our legitimate interests in pursuing the purposes set out in the table in section 3 below, and (when we make the disclosures to the Enviri Group for the audit and corporate transaction purposes referred to below) necessary for the Enviri Group's legitimate interests in prudential management and meeting accountability

and regulatory requirements, such interests in each case not being overridden by your privacy interests;

- required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below;
- necessary for the performance of a task carried out in the public interest;
- when we use special categories of personal data, necessary for making a determination in connection with eligibility for, or benefits payable under, the Scheme (where authorised under local or EU law), for preventing fraud or other unlawful acts, for establishing, exercising or defending legal claims, or where the processing relates to personal data manifestly in the public domain; and
- 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 information we collect from you is needed to meet our legal or regulatory obligations or to pay benefits to you or your nominated beneficiaries, if we cannot collect this personal information, we may be unable to record or pay your or your beneficiaries' benefits. We will identify any such "required" data to you when we seek to collect it.

### 3 How we use your information

We use your information for the purposes and lawful bases as set out in the table below:

Purpose / activity	Information we use	Legal basis
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 schemes	<ul style="list-style-type: none"> <li>• Personal Details</li> <li>• Benefit Information</li> <li>• Communications Records</li> <li>• Beneficiary Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Consent</li> <li>• Legal obligation</li> </ul>
	<ul style="list-style-type: none"> <li>• Special Categories of Data</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Substantial public interest in making a determination in connection with the Plan</li> <li>• Social security and social protection law</li> </ul>

<p>For general administration of the Scheme, including: to record and pay benefits; for actuarial valuations; 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 or mortality testing) should we happen to lose contact with you or to prevent fraud</p>	<ul style="list-style-type: none"> <li>• Personal Details</li> <li>• Benefit Information</li> <li>• Communications Records</li> <li>• Beneficiary Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Consent</li> <li>• Legal obligations</li> </ul>
	<ul style="list-style-type: none"> <li>• Special Categories of Data</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Substantial public interest in making a determination in connection with the Plan</li> <li>• Social security and social protection law</li> </ul>
<p>For meeting our on-going regulatory and compliance obligations, and investigating or preventing crime</p>	<ul style="list-style-type: none"> <li>• Personal Details</li> <li>• Benefit Information</li> <li>• Communications Records</li> <li>• Beneficiary Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligations</li> </ul>
	<ul style="list-style-type: none"> <li>• Special Categories of Data</li> </ul>	<ul style="list-style-type: none"> <li>• Substantial public interest</li> </ul>
<p>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</p>	<ul style="list-style-type: none"> <li>• Personal Details</li> <li>• Benefit Information</li> <li>• Communications Records</li> <li>• Beneficiary Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
<p>Activities from time to time to help us manage the liabilities of the Scheme, such as obtaining life insurance, longevity hedging, scheme mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises,</p>	<ul style="list-style-type: none"> <li>• Personal Details</li> <li>• Benefit Information</li> <li>• Communications Records</li> <li>• Beneficiary Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligations</li> </ul>

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.	<ul style="list-style-type: none"> <li>• Special Categories of Data</li> </ul>	<ul style="list-style-type: none"> <li>• Social security and social protection law</li> </ul>
--	--	---

#### 4 Disclosures of your information

We share your information with the following recipients:

- our suppliers, including the Enviri Group and Aegon (as providers of administration services), HUB Financial Solutions (as a provider of retirement services), and other providers of services to us and them, such as administrators, financial advisors (to provide you with financial advice), third party dashboards services providers (to help us implement mandatory requirements to connect to pensions dashboards), legal advisors (to provide legal advice to the Trustees), payroll providers (to record and pay benefits), the scheme actuary (for actuarial calculations), and printing, communication, IT and hosting, marketing, 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 information remains secure);
- the Enviri Group, who will use the information for audit purposes, in relation to corporate transactions initiated by the Enviri Group, and to allow you to flex your benefits including your pensions options;
- insurance and reinsurance companies, when we carry out the activities referred to in the final row of the table in section 3 above;
- public authorities, regulators or government bodies, 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
- others persons from time to time 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.

#### 5 Transfers of your information abroad

The use and disclosure of your information, including for the purposes set out in the table above, may involve transferring your information outside of the United Kingdom and European Economic Area. In those cases, we will only do so where adequate protections are in place to protect your privacy.

We rely on the following transfer mechanisms:

- **Adequacy decisions:** Some of these transfers may be based on an “adequacy decision” issued by the UK Government. Adequacy decisions recognise that a certain country or territory provides an adequate level of data protection comparable to that under UK law.

- **Standard Contractual Clauses:** Where the relevant country has not been determined to ensure an adequate level of data protection, we have in place contractual measures to ensure that the transferred information is protected, including the Standard Contractual Clauses and UK Addendum approved by the European Commission and the UK Government.

If you would like more information about the specific safeguards in place for international transfers of data, including copies of any data transfer agreements we use, feel free to contact us using the contact details below.

## 6 Retention of your information

We keep your information for no longer than is necessary for the purposes outlined in this Privacy Notice, or for other legitimate purposes, including to satisfy any legal, regulatory, tax, accounting, or reporting requirements.

To determine the appropriate retention period, we consider a number of factors, including the Scheme's operational requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, and calculating and managing the liabilities of the Scheme; and our legal or regulatory responsibilities, including responding to legal claims or regulatory requests.

## 7 Your rights

You have rights under data protection law of access to, and rectification or erasure of, your personal information, and to restrict its processing and (in some circumstances) to require certain of your information to be transferred to you or a third party.

You also have the right to object to the processing of your information in some circumstances, and to tell us that you do not wish to receive marketing information.

If we process your information based on your consent, you also have the right to withdraw your consent at any time. This will not impact the lawfulness of processing based on consent before it is withdrawn.

You can exercise any of these rights by contacting our Privacy Office at the details set out below.

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.

You also have the right to 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](http://www.ico.org.uk).

## 8 Contacting our Privacy Office

If you have any questions, concerns or issues about the way we're handling your personal information or want to exercise any of your data subject rights (or find out if they apply), please contact our Privacy Office by email at [ukpensions@harsco.com](mailto:ukpensions@harsco.com).

Alternatively, if you would rather contact us by post, please address this to:

The Trustees of the Harsco Pension Scheme

Attn: Privacy Office

The Trustees of the Harsco Pension Scheme

Office 3A, 3rd Floor

Capital Tower

91 Waterloo Road

London

SE1 8RT

## **9 Updates to our Privacy Notice**

We may amend or update our Privacy Notice from time-to-time. We will provide you notice of amendments to this Privacy Notice, as appropriate, and update the "Last updated" date at the top of this Privacy Notice. Please review our Privacy Notice from time to time.