

**CRANE PENSION TRUSTEE COMPANY (UK) LTD AND  
CRANE UK GROUP LIFE ASSURANCE SCHEME (THE "SCHEME")****THE GENERAL DATA PROTECTION REGULATIONS ("GDPR")  
OVERALL PRIVACY POLICY**

The Trustee of the Scheme, Crane Pension Trustee Company (UK) Limited (the "**Trustee**"), carries the responsibility for the lawful processing of personal data, which is data relating to a living individual who can be identified from that data, and this brings with it duties and obligations which must be satisfied. The Trustee must ensure that:

- it has appropriate and up-to-date knowledge of the requirements of data protection legislation, and that training is provided to directors of the Trustee where deficiencies are identified;
- it is able to deal with requests from data subjects (those individuals whose personal data the Trustee processes or directs the processing of) in accordance with the **Data Subject Rights Policy**;
- it keeps under review its processes and the data it processes and makes appropriate changes; and
- it reviews and keeps under review all contracts with third parties to ensure they comply with data protection legislation and adequately protect personal data.

General Guidelines

The Trustee will:

- ensure that it has, and continues to have, a lawful basis on which it processes personal data in relation to the Scheme;
- provide, through privacy notices, details of the data held, how it will use the data, the data subjects' rights, retention period information, and any other information required by the data protection legislation – in a clear, transparent, plain English format which will be accessible and free of charge;
- routinely use encryption and strong passwords to secure documents and communications, and will not share data informally;
- ensure that data stored in electronic format is stored only on designated, approved systems, is backed up frequently and where stored on removable media is locked away when not being used;
- regularly review personal data processed for accuracy, update it where it is out of date and delete it in accordance with the **Data Retention Policy**;
- ensure that only it and individuals authorised by it will process personal data, and all such processing will be approved and confirmed as lawful in connection with the Scheme;
- ensure that paper documents containing personal data are stored securely when not being used, not left where unauthorised people may see them and securely disposed of when no longer required in accordance with the **Data Destruction Policy**;
- ensure that a data subject is advised of any breach involving their data and/ or inform the ICO<sup>1</sup>, in both cases if required, in keeping with the **Data Breach Management and Reporting Policy**;

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<sup>1</sup> Information Commissioner's Office

- ensure that minimum copies of data are stored, avoiding duplication;
- ensure that computers are 'locked' when left unattended;
- obtain written confirmation from all third parties with whom it deals in relation to the Scheme that they have a cyber security policy and are GDPR compliant, specifically addressing Article 28; and
- ensure it has in place detailed policies which will underpin these general guidelines, covering its core data protection responsibilities as outlined in the GDPR and the Data Protection Act 2018, including but not necessarily limited to those listed in the Record Keeping section below.

#### Dealings with Third Parties

It is the Trustee's policy to communicate to all data subjects the reason for holding their personal data and when and how third parties may be given access to that data. Where third parties are engaged, the Trustee will:

- carry out proportionate investigations to ensure such parties are GDPR compliant;
- ensure appropriate contractual provisions are in place in relation to GDPR compliance; and
- keep third party relationships and contracts under review.

#### Day-to-Day Activities

The Trustee will keep in place policies for dealing with how it processes data on a day-to-day basis i.e. when undertaking its day-to-day duties to manage and administer the Scheme.

The Trustee will process data in line with its **Trustee Day-to-Day Compliance Policy**.

#### Record Keeping

The Trustee will keep records of privacy notices that have been issued and policies that it holds, and details can be found/obtained from Scott Dalrymple, Vice President HR or [www.cranebsu.com](http://www.cranebsu.com)

The Trustee will keep and maintain GDPR compliant policies for:

- Data Retention
- Data Breach Management and Reporting
- Data Subject Rights
- Data Destruction
- Trustee Day-to-Day Compliance

#### Information

The Trustee has agreed that Scott Dalrymple, Vice President HR is to act as the first port of call in relation to any matters concerning data protection, this Overall Privacy Policy and any of the policies referred to in this Policy. For the avoidance of doubt, Scott Dalrymple, Vice President HR is not acting as a Data Protection Officer in carrying out this role.