Trustee of the Leonardo Electronics Pension Scheme
GDPR - Fair Processing Notice

Your privacy is important to us. We will process your personal data in accordance with applicable data protection law and as explained in this 'fair processing notice' (also sometimes referred to as a 'privacy notice'). We keep this Fair Processing Notice under regular review. This version was last updated on 17 September 2025.

The data controller in respect of the personal data you submit to us either directly or via your employer, Leonardo UK Ltd, is Leonardo Pension Schemes (Trustee) Ltd (the "**Trustee**") as the Trustee of the Leonardo Electronics Pension Scheme (the "**Scheme**") who you can contact via the Scheme Administrator, XPS Administration, on LEPS@xpsgroup.co.uk. We use your personal data to administer and manage your pension and pay you or any person in respect of you the benefits provided by the Scheme.

We process the personal data provided to us for the purpose of administering and managing your pension and paying you and/or your spouse and dependants benefits. Therefore, we process your personal data on one or more of the following bases (as relevant to you): (1) on the legal basis that the processing is necessary for the performance of the contract of employment between you and Leonardo UK Ltd regarding your participation in the Scheme, (2) to comply with our legal obligations including (but not limited to) the provision of your data as required under the Pension Schemes Act 2021 and the Pensions Dashboards Regulations 2022, which may involve the provision of data to a qualifying pensions dashboard service, (3) further to our legitimate interests as Trustee of the Scheme (i.e. to effectively operate, administer and audit the Scheme; prevent fraud; keep our records up to date and any other legitimate interests that we may identify, provided always that your interests and fundamental rights do not override those interests). If you do not provide us with the personal data that we specify is required for administration of the Scheme, then we may not be able to administer the benefits provided by the Scheme. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

As well as collecting it directly from you, we may receive your personal data from other sources, including: your employer (or its suppliers), your IFA, from track and trace services, from HMRC or law enforcement agencies or (if you are a beneficiary or potential beneficiary),

from expression of wish forms/documentation completed by (or on behalf of) a member of the Scheme. Personal data that a third party may provide to us for the purpose of administering the Scheme may include (but is not limited to):

- identity data, such as first name, last name, maiden name, marital status, date of birth, national insurance number and gender;
- contact data, such as postal address, email address, telephone number; and
- financial data, such as bank account details, past activity relating to the Scheme, financial interdependency with others, information relating to contributions or benefits under the Scheme, your status as a Scheme member or potential beneficiary, and information relating to your tax band.

To the extent that it is necessary or desirable for the management and administration of the benefits provided by the Scheme, we will transfer your data to Leonardo UK Ltd (the "**Company**"), other participating employers in its group and their advisers, the Scheme's advisers, service providers and/or partner organisations including other pension arrangements to which your benefits are being/may be transferred. We may also disclose your information to third parties in order to operate, administer and audit the Scheme responsibly, in the event that Leonardo UK Ltd undergoes any corporate project in the future which may have an impact on the Scheme, in the event that we decide to de-risk or insure any of the benefits provided by the Scheme (in which case we may disclose your personal data to the prospective insurer(s) and reinsurer(s)) or where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustee, the members of the Scheme, or others. We do not use your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.

Your personal data may be processed outside of the United Kingdom where required in order for us (or a third party supplier acting on our behalf) or Leonardo UK Ltd to provide benefits to or in respect of you. In each instance, we would take all steps reasonably necessary to ensure that the processing of your personal data outside the United Kingdom is safeguarded through adequate means such as ensuring that the recipient has entered into the Standard Contractual Clauses, otherwise known as the International Data Transfer Agreement (IDTA), as approved by the Information Commissioner's Office which give the transferred personal data the same protection as it has in the UK. In all cases this would be limited to circumstances where it is necessary in order to administer an overseas pensions arrangement which you have requested. If any such transfers affect you, you can contact us for more information.

We will keep your personal data stored on our systems for as long as it takes us to provide the pension and other benefits provided under the rules of the Scheme. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data.

Some data, for example data in relation to your health or personal life, is regarded as a 'special category' of data. We have to process that special category data to perform our obligations under employment law and the law relating to social protection. Therefore, we do not expect that we will need your specific consent to process that information (because another legal ground will cover our use of that data for these purposes). However, it might be that we ask you for your specific consent from time to time to process such data. Where we or third parties are processing your personal data on the basis that you have consented to that processing then you are entitled to withdraw your consent. If you do withdraw your consent, we may be unable to administer your pension which may result in you and/or your spouse and dependants not receiving the pension and death benefits provided by the Scheme.

Data protection legislation gives you the right to access information held about you. Should you make such a request, we may charge a 'reasonable fee' to meet our costs in providing you with details of the information we hold about you (or to comply with requests for further copies of the same information) where we are entitled to do so under applicable data protection law (e.g. where the request is "manifestly unfounded or excessive"); in each case the fee will be based on the administrative cost of providing that information. You also have rights, in some circumstances, to restrict, object to the processing of, rectify and / or require us to erase your personal data.

You are entitled to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller. You can exercise your data protection rights by contacting the Scheme Administrator, XPS Administration, on LEPS@xpsgroup.co.uk. If you are unhappy with the way in which your personal data is being processed you have a right to lodge a complaint with the Information Commissioner's Office. You can report your concerns by telephoning their helpline on 0303 123 1113 or through their website at https://ico.org.uk/concerns.

Where third parties (such as the Scheme's advisers) are required to process your personal data in order to assist the Trustee or Company in administering the Scheme, those third parties

may themselves act as data controllers in respect of the way in which they process your personal data and produce their own fair processing notices (also referred to as 'privacy notices'). Various third parties have asked the Trustee to provide you with access to their fair processing notices which explain how they process personal data and meet their compliance obligations under privacy laws. The Trustee will publish any such notices, or links to websites containing those notices, on the Scheme's website at www.lepensions.co.uk.

17 September 2025