

TRUSTEES OF THE AVERY DENNISON PENSION PLAN

HOW WE PROCESS YOUR PERSONAL INFORMATION



This is a summary of how the Trustees of the Avery Dennison Pension Plan (the **Plan**) (the **Trustees** or **we**) obtain, store, use and share your personal information. The Trustee's detailed privacy notice is available on request from email: payroll.uk@eu.averydennison.com or write to us at Trustee of the Avery Dennison Pension Plan, Nelson Way, Cramlington, NE23 1JR, United Kingdom. Alternatively, you can ask us to send you a copy.



Who are we?

We are the Trustees of the Plan. This summary explains our role as a data controller when we use your personal information in order to help us run the Plan.



Whose data do you process?

We collect and process personal information about you in your capacity as a member of the Plan or as someone who is connected to a member of the Plan.



What data do we process?

We process information such as names, contact details, marital status, dates of birth, National Insurance numbers, employment history, salary and bank details relating to the Plan's beneficiaries.



How long do we keep data for?

Because pensions are long-term benefits, we may need to keep your information for a long period of time (i.e. the life of the Plan plus 15 years).

We determine how long we keep data based on whether it is needed to calculate and pay benefits, to maintain up to date and accurate records, to be able to respond to queries from members or regulatory bodies, to comply with legal or regulatory record keeping requirements, to defend actual or possible legal claims or to comply with any other legal or contractual obligations. Our service providers (and former service providers) may also have similar valid reasons to keep your personal information for such long periods.



Who do we share your data with?

We share your personal information with other parties who help us run and manage the Plan. This would usually include the Plan's employers, professional advisers and other relevant third parties.

We may also share your information with insurance companies, independent financial advisers, other pension schemes and other relevant third parties as we seek to manage the Plan's risks and liabilities, improve our information and knowledge of pension schemes generally and deal with all benefit entitlements appropriately.

In some circumstances, we may have to disclose your personal information by law, because a court, the police or another law enforcement agency has asked us for it. We may be required to pass your personal information to The Pensions Regulator or HMRC.



We **do not** carry out any automated decision making or profiling.



The Trustees' full privacy notice is available on request (see details above). The Trustees may update their privacy notice from time to time. Please contact us using the details overleaf to receive a copy of the latest version.



Why do we process data?

We process your personal information so that we can manage the Plan, its risks and liabilities and your rights under it appropriately and so that we can pay any benefits that you and others are entitled to.



What are the Trustee's legal grounds for processing?



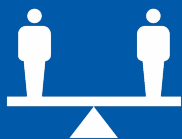
Legal obligations

We process your personal information so that we can comply with various legal obligations. These include complying with legislation, the rules of the Plan, and applicable court rulings and Pensions Ombudsman determinations.



Legitimate interests

Processing your personal information also enables us to pursue the Trustees' legitimate interests. These include managing and administering the Plan, managing the Plan's risks and liabilities, improving our knowledge and information about pension schemes generally paying out the correct benefits and complying with relevant legal and regulatory requirements.



What rights do you have?

Under the UK's data protection laws, you have a number of rights in respect of the processing of your personal information. This summary provides an overview of your rights. The Trustee's privacy notice sets out more detail on each of your rights.

You have the right to object to the processing of your personal information, the right to request access to your personal information and the right to request that any mistakes in your personal information are corrected. For any personal data that we process in order to fulfil our legitimate interests rather than

to comply with a legal obligation, you also have the right to request to restrict or prevent your personal information being processed, to request to have your personal information transferred to another data controller and to request to have your personal information deleted.

Under the relevant data protection law, we may still have valid reasons to continue to store, process or transfer your personal information. You can find out more about your rights under the UK's data protection laws at www.ico.org.uk. Requests in relation to your personal data must be made to us in writing. Our contact details are set out below.



How can you get in contact?



Please contact us if you have any questions about this data protection summary, the Trustees' detailed privacy notice or the information we hold about you.



payroll.uk@eu.averydennison.com



Trustee of the Avery Dennison Pension Plan, Nelson Way, Cramlington, NE23 1JR



Current employees should submit a request via ad.a



Information Commissioner's Office

The Information Commissioner's Office (ICO) is the UK's data regulator. If you are not satisfied with our response, you can complain to the ICO.



www.ico.org.uk



0330 8303 0338



ICO House, London, WC12 2SW



The Trustee has produced a detailed privacy notice which sets out what personal information we process, why we process it and who we share it with. The Trustee's privacy notice is available on request from email: payroll.uk@eu.averydennison.com or write to us at Trustee of the Avery Dennison Pension Plan, Nelson Way, Cramlington, NE23 1JR, United Kingdom. Alternatively, you can ask us to send you a copy.