KIMBERLY-CLARK PENSION SCHEME

DATA PROTECTION NOTICE

June 2026

Who are we?

We are the Trustee of the Kimberly-Clark Pension Scheme (the **Trustee**, **we** or **us**). We collect, hold and use personal information to help us run the Kimberly-Clark Pension Scheme (the **Scheme**).

The Trustee is a data controller in respect of the personal information that we hold in relation to the Scheme. Because we use your personal information, we have to provide you with certain information in order to comply with the UK General Data Protection Regulation (**UK GDPR**) and the Data Protection Act 2018 (together, the **Data Protection Legislation**).

What information do we collect and process?

We collect and process your personal information because you are or were a member, or are or were connected to a member of the Scheme. We also collect personal information if you contact us in connection with your membership of the Scheme.

We collect and process the following categories of personal information about you:

- **Personal contact details** – names, titles, addresses, telephone numbers and email addresses;
- **Information about you** – dates of birth, gender, marital and relationship status, dependants and next of kin;
- **Payroll information** – National Insurance numbers, payroll numbers, bank account details, tax status, salary and employment information; and
- **Pension benefits** – information about the pension benefits that you have accrued, investment choices and death benefit nomination forms.
- **Pensions dashboard information:** if you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, a “pensions identifier”, which is a string of characters used to identify your specific benefits under the Scheme.

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you.

What sensitive personal information do we collect and process?

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries. Under data protection legislation, details relating to health and sexual orientation (among others) are regarded as “special categories of personal data”. We usually only ask for such sensitive personal information when it is required to help us make a decision in relation to your rights under the Scheme. For example, you may disclose information relating to your health, relationship or marital status to allow the Trustee to pay certain benefits. Except where the law allows it, we will need your consent to collect, hold and transfer this type of sensitive data.

How do we collect your personal information?

When you join the Scheme, you and/or Kimberly-Clark provide personal details so that we can create your membership record.

This information is updated whilst you are a member of the Scheme. Updated information may come from:

- You (e.g. if you get in touch to let us know a new address);
- Kimberly-Clark (e.g. updated salary and payroll information); and
- Other third parties (e.g. if you contact the Scheme's administrators to update your personal information or if HMRC provides us with information so that we can deduct the correct level of tax, public databases such as the Register of Births, Deaths and Marriages, other pension schemes, third parties used to trace members or beneficiaries and other third parties such as next of kin or anyone else who may be entitled to benefit from your membership of the Scheme).

We may request additional information in certain circumstances (e.g. if you request to transfer your benefits to another pension scheme, or when you ask for your benefits to start being paid). Where you have provided us with information about other individuals, such as family members, dependants or potential beneficiaries under the Scheme, please ensure that those individuals are aware of the information contained within this statement.

Why do we process your personal information?

The Trustee usually holds and processes information about you to comply with its obligations under the Trust Deed and Rules of the Scheme and relevant legislation.

In other cases, the Trustee has a legitimate interest in holding and processing this information as it is needed for us to properly administer the Scheme and to calculate and pay your benefits. Your personal data is held on paper and on computer systems.

The Trustee keeps information to the extent to which required to comply with its duties in relation to individuals using pensions dashboards. This includes "matching", where the Trustee uses personal data that a user has provided to search the Scheme records to check whether that user is a member of the Scheme, and where the Trustee collects further personal data from that user in the event of a "possible match".

How long do we keep your personal information for?

The Scheme was set up to provide benefits over a very long time. The Trustee need to maintain records in order to properly run the Scheme, to determine who should receive what levels of benefits and when they should receive them, and to respond to any disputes about an individual's rights under the Scheme.

As a result, the Trustee's general policy is to keep your personal information for the lifetime of the Scheme plus 15 years. However, where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, the Trustee will comply with that restriction.

Transfers of your personal information out of the United Kingdom or EEA

In certain circumstances, we (or our service providers) may transfer, store, or process your personal data outside of the UK or EEA.

The Trustee does not allow Scheme personal data to be transferred outside of the United Kingdom or EEA unless:

- it is transferred at the request and with the express consent of the Scheme member in relation to his/her own benefits (or a dependant or beneficiary, as appropriate),

- it is required to fulfil a contractual obligation in respect of the member (or a dependant or beneficiary, as appropriate),

- there has been a finding of adequacy pursuant to Article 45 of the EU GDPR (or Article 45 of the UK GDPR if and to the extent applicable) in respect of that country or territory,

- a contract has been put in place with the third party/parties to which the Scheme personal data will be transferred containing appropriate safeguards in relation to the Scheme personal data, including where necessary undertaking a transfer risk assessment to ensure that the receiving jurisdiction has a legal framework that provides adequate protection for the processing of personal data,

- the transfer is being made where "binding corporate rules" are in place to provide appropriate safeguards,

- the transfer is being made in accordance with the requirements of an applicable "data bridge" between the UK and relevant country (such as a transfer to organisations in the United States certified under the UK Extension to the EU-US Data Privacy Framework from 12 October 2023), or

- any other mechanism pursuant to, and recognised by, the Data Protection Legislation.

Who do we share your personal information with?

For the purposes of administering and managing the Scheme, managing its risks and liabilities, and paying benefits under it, the Trustee may need to share your personal information with a number of third parties.
This will include Kimberly-Clark (e.g. the payroll, finance, audit and compliance and HR teams) and its actuary, auditor and third parties who provide advice or services to the Trustee.

These third parties include:

- administrators,
- insurers and prospective insurers,
- IFAs,
- lawyers,
- medical advisers,
- communication consultants,
- HMRC, the Pensions Regulator, the Pensions Ombudsman,
- third parties that form part of the "dashboard ecosystem" that enables pensions dashboards services to work, as well as the Scheme's Integrated Service Provider (ISP), which provides a service allowing pensions information from the Scheme to be connected to the dashboard ecosystem; and
- any other such third parties as may be necessary for the operation of the Scheme and to enable the Trustee to carry out their duties.

Our suppliers and service providers who act as data processors must act in accordance with our instructions. Some of our suppliers and service providers also act as data controllers in respect of your personal information, including the Scheme actuary whose privacy notice can be accessed at https://www.willistowerswatson.com/en-GB/Notices/how-willis-towers-watson-uses-personal-data-for-actuarial-services-to-uk-pension-scheme-trustees

In some circumstances, we may have to disclose your personal information by law, because a court or the police or other law enforcement agency has asked us for it. We may also need to pass your personal information to the Pensions Regulator or HM Revenue and Customs.

Sometimes, in order to improve our knowledge and information of pension scheme generally (so that we may improve our ability to run the Scheme appropriately) we pool the personal data we hold with that of other pension schemes through third parties (for example, to obtain up to date and more accurate longevity data).

What rights do you have in respect of your personal information?

In certain circumstances, you have the following rights in respect of your personal information:

- The right to request **access** to personal information relating to you;
- The right to request that we **correct any mistakes** in your personal information;
- The right to request or **restrict or prevent processing** of your personal information in certain circumstances;
- The right to **object** to us processing your personal information where we are relying on having a legitimate interest to use it, although the Trustee can override this objection in specific instances;
- The right to receive your personal in a commonly used electronic format in certain circumstances;
- The right to request to have your personal information **deleted** altogether**,** although the Trustee can override this request in specific circumstances;
- Where you have given us your consent to processing your personal information, the right to withdraw your **consent** at any time by notifying us. However, withdrawing your consent will not affect how we used any of your personal information beforehand and we may be able to justify continued use; and
- The right to **complain** to the Trustee or the ICO.

If you have any comments, concerns or complaints about our use of your personal information, please contact the Pension Scheme Administrators (see 'How to contact us' section below for contact details).

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you. If you wish to contact us, please contact the Pension Scheme Administrators, Equiniti Pension Solutions at PO Box 556, Crawley, West Sussex, RH10 1WS or on 0203 890 2160 or via email kimberlyclark@equiniti.com.

Making a complaint

If you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to us by contacting Kimberly-clark@vidett.com or by completing the Scheme's IDRP.

If you are not satisfied with our response to your complaint, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113.**

Updates to this notice

This notice is the latest version as at June 2026. This notice will be updated from time to time and you can see the current version at any time on the Trustee's website at www.kcpensions.co.uk