



Fidelity Master Trust

Privacy
Statement

January
2026

Workplace Investing



Your Employer's Pension Plan is part of the Fidelity Master Trust. The Fidelity Master Trust has been set up to provide pension schemes for different employers under the same trust and is governed by a board of Trustees.

As trustees of the Fidelity Master Trust Scheme (the Scheme) we are committed to protecting your personal data. This statement explains how we do that. It sets out what we do with your personal data, how we protect it, and explains your pertinent privacy rights.

Who are we?

We, as the trustees of the Scheme are responsible for the running of the Scheme which means administering the accrual and payment of your benefits. To assist us in this regard we have appointed FIL Life Insurance Limited (Fidelity) as the administrator of the Scheme and in this context as our data processor for the handling of your personal data.

Fidelity is part of the Fidelity International Group (Fidelity Group). You can find out more about Fidelity at [fidelitypensions.co.uk](https://www.fidelitypensions.co.uk). The Fidelity Group operates in many countries; the main countries for the purposes of the Scheme are the United Kingdom, Ireland and India.

Fidelity and the Trustees can be contacted using the contact details at the end of this Statement.

Your Personal Data

As trustees of the Scheme, we need to hold certain personal information (known as "personal data") about members of the Scheme and, where applicable, their dependants and beneficiaries.

Fidelity, on our behalf, collects and uses your personal data to enable us to run the Scheme and to comply with the law.

Why we collect it

The law requires us to tell you why we collect and use your personal data – this is known as the lawful basis for processing. The basis we rely upon will depend on the purposes for which we are processing your personal data. These are detailed below:

1. Our Legitimate Interests

We, and Fidelity on our behalf, process your information for the following reasons, which we define as our **legitimate interests**:

- providing and administering the Scheme for you;
- to enable the conduct of security operations, such as using your IP address to help identify you when you log in to PlanViewer;
- identifying you when you contact us;
- helping us with our internal research and analysis;
- to increase member engagement, for example to encourage members to be more aware of their holistic financial needs;
- developing new services.

Fidelity may also process your information pursuant to its legitimate interests:

- to help with its internal research and analysis;
- to develop new services and products and;
- to enable a consistent and integrated service to you, if you hold multiple accounts with Fidelity.

2. Our Legal Obligations

In some circumstances, we and/or Fidelity, have a **legal obligation** to process and share your personal data.

We and/or Fidelity must provide a wide range of data to regulators or other entities in order to prevent or detect crime.

Sometimes this involves personal data. We or Fidelity will never transfer more personal data than is necessary to discharge our legal obligations.

3. Your Consent

We and/or Fidelity will ask you for your preferences in terms of how you would like us to communicate with you and what information you would like to receive from us. You can always adjust your communication preferences, and can opt not to receive information from us unless we are obliged to provide it.

What we collect and how

The personal data you provide to us will include combinations of any of the following: your name, email address, telephone number, address, identification numbers such as national insurance number, banking account details, date of birth, voice biometrics & voice recordings, location information, employment information, gender, IP address, language, and marital status, dependants and beneficiaries.

This information is typically provided to us by your employer or by you through the course of your relationship with us. We hold your personal information relating to the Scheme on paper and on computer systems, and use artificial intelligence (AI) to automate some of our business processes to provide our services to you. This is with appropriate human oversight, and any AI-assisted decision-making will be appropriately disclosed to you.

As part of running the Scheme, from time to time we, and Fidelity on our behalf may also need to hold and process sensitive information about you and/or your dependants and beneficiaries (known as "special category data"). Under legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation political affiliations and biometric data are regarded as "special category data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

If we need your consent to process or pass your special category data to a third party, we will ask you to provide it at the relevant time. Where you tell us about any additional needs you have (for example relating to an illness or challenges you're facing in life), we will record this information to provide you with appropriate additional support. Where this includes your special category data, we will ask for your consent to do so. We will hold this information for as long as you need extra support from us, or until you ask us to remove it (whichever is shorter). This may depend on the circumstances and the stage of your membership.

Who we share your personal data with

Like most businesses, Fidelity uses third parties, including other entities in the Fidelity Group, to help deliver its services. This will often involve a third party processing your personal data but that will only be in line with the purposes set out above. Fidelity, on our behalf, operates a regular and strict regime of third-party checks on how your personal data is protected.

Your personal data will be held in confidence by us and Fidelity but may be passed to other companies as detailed below:

- to Fidelity Group companies or their agents in order to administer the Scheme and carry out our legitimate interests, which may include the transfer of your information outside the EEA;
- we, Fidelity, or other Fidelity Group companies, are provided with updated address details or other information by either you or your employer, in which case we will update the information kept for any other schemes of which you are a member and for which we hold records on our database;
- to the Scheme's professional advisers, including the Scheme auditor, investment advisers and lawyers;

- to your employer, or another company in your employer group of companies, and their advisers to help Fidelity administer the Scheme;
- to any third parties who we appoint to be responsible for the day-to-day administration of the Scheme on our behalf;
- to HM Revenue & Customs, the Financial Conduct Authority and other statutory bodies (such as the Financial Ombudsman, The Pensions Ombudsman and The Pensions Regulator) – we can be fined and subject to other action if we fail to provide certain information to these authorities;
- to the advisers, printers or other third-party service providers to Fidelity who help to prepare the various communications and information sent to you, such as the annual benefit statement;
- to companies who facilitate payments to you, for example tracing agents, and to allow regulatory money laundering checks to be made and BACS and Western Union payments to be made;
- to a financial adviser who is acting on your behalf;
- to Fidelity's affiliated and associated companies for marketing purposes where you have provided your specific consent;
- at your request only, to other Fidelity International companies in order to provide improved servicing of the accounts you hold with Fidelity Group, including reporting to you;
- to a benefits consultant or third-party service provider engaged by us or Fidelity to allow improved servicing of your pension account and to help manage our, and Fidelity's relationship with you and assist with any internal research and analysis in relation to the same;
- to a qualifying pensions dashboards provider or the Money and Pensions Service to ensure your up-to-date information is available to be requested via a dashboard service.

Any transfer of information will usually be by electronic means, including the internet.

Transferring your personal data to other countries

In today's global market, it is necessary to transfer your personal data across national borders. These transfers may involve at least one of Fidelity's Group entities operating in the UK and/or EEA and as such will apply the English law and/or European (as applicable) standard of protections to the personal data we process. In practice, this means that all the entities in the Fidelity Group agree to process your personal data in line with high global standards. Where your personal data is transferred within the Fidelity Group but outside of the UK and/or EEA, that data subsequently receives the same degree of protection as it would in the UK and/or EEA and in this regard Fidelity has put in place appropriate and suitable safeguards, by adopting UK and/or European Commission approved safeguards for international transfers of personal data outside of the UK and/or EEA. The Trustees keep this under regular review. For more information, please contact Fidelity.

Where it is necessary to transfer personal data to a third party, stringent reviews of those with whom we share the data are carried out and that data will only be transferred in line with the purpose for which it was collected. The third parties who help us process your data are located in the following countries: the United Kingdom, Ireland and India.

Security of Your Personal Data

Ensuring the confidentiality, integrity and availability of your personal data defines our approach to information security. We ensure that the security risks to your personal data are managed in a way that makes sure we, and Fidelity, meet our legal and regulatory obligations. We ensure that Fidelity produces, maintains and regularly test their business continuity plans.

Fidelity utilises the internationally recognised information security best practices, ISO27001 and PCI-DSS. Their Information Security Policy & Standards are regularly reviewed, adhered to and tested for compliance. Information Security training is mandatory for all staff and breaches of information security, actual or suspected, are reported and investigated.

Your Rights

European law places robust obligations on entities for the protection of personal data. The way we protect your personal data reflects our European obligations. A number of rights in relation to the use of your personal information empowers you to make certain requests of us, detailed as follows:

1. Requesting a copy of your personal data

You can access the personal data we/Fidelity hold about you and exercise your right to have a copy provided to you, or someone else on your behalf, in a digital format by emailing or writing to Fidelity using the contact details at the end of this Statement.

2. Letting us know if your personal data is incorrect

If you think any of the personal data we/Fidelity hold about you is wrong please let Fidelity know by contacting the Pensions Service Centre. Fidelity will check the accuracy of the information and take steps to correct it if necessary.

3. Asking us to stop using or to erase your personal data

You have the right to object to our use of your personal data. You can ask us to delete it, to restrict its use, or to withdraw consent to the processing of your personal data (for example the use of your personal data for marketing). If you would like us to stop using your data in any way, please get in touch. Of course, if we are still providing services to you we will need to continue using your information to deliver those services. In some circumstances we are obligated to keep processing your information for a set period of time or indefinitely.

Information will generally be provided to you free of charge, although we can charge a reasonable fee in certain circumstances.

How long do we keep your personal data?

We and Fidelity must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal information for a minimum of 6 years. However, given the nature of pension schemes, we need to keep some of your personal information indefinitely.

How to complain

If you are unhappy with how we have used your personal data, you can contact the Trustees of the Fidelity Master Trust at:

Trustees of the Fidelity Master Trust c/o Fidelity International, Fidelity International, Beech Gate, Millfield Lane, Surrey, KT20 6RP.

If you are unhappy with how Fidelity has used your personal data, you can complain by contacting Fidelity at:

UK Data Protection Officer, Fidelity International, Beech Gate, Millfield Lane, Surrey, KT20 6RP.

Or you can simply call the Pensions Service Centre on 0800 3 68 68 68 or email us on pensions.service@fil.com.

Finally, you also have the right to complain to your national data protection authority: Information Commissioner's Office whose helpline number is: 0303 123 1113.

A copy of our latest notice will be available to you on PlanViewer. This notice may be updated from time to time and you will be notified of any such updates.

0800 3 68 68 68

fidelitypensions.co.uk

pensions.service@fil.com

Workplace Investing



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UKM0126/MH2524/QC/0826

WF-3577234