

**CRANE PENSION TRUSTEE COMPANY (UK) LTD AND  
CRANE UK GROUP LIFE ASSURANCE SCHEME (THE "SCHEME")****THE GENERAL DATA PROTECTION REGULATIONS ("GDPR")  
TRUSTEE DAY-TO-DAY COMPLIANCE POLICY**General

- This document sets out the Scheme trustee's ("**Trustee's**") policy for day-to-day GDPR compliance by the Trustee, in the way it operates and processes data.

Trustee Policy

The Trustee shall take the following steps on a day-to-day basis:

- All Trustee meeting packs shall be anonymised as far as practicable and shall not contain personal data unless expressly agreed in advance by the Trustee either on an individual case basis or as a matter of general policy;
- As far as practicable, personal data in member cases (for example, set out in reports issued by the Scheme administrators) will be anonymised unless expressly agreed in advance by the Trustee either on an individual case basis or as a matter of general policy;
- All electronic communications sent by the Trustee which contain personal data will be password protected, and passwords must be sufficiently strong to afford the appropriate level of protection, for example, through the use of upper and lower case, numeric and special characters and being a minimum of 12 characters in length;
- Printed documents containing personal data shall not be removed from the employer's or Trustee's premises, and shall be stored securely when not being used;
- All data stored on removable storage (USB drives, CDs, etc.) will be password protected and will be securely stored when not being used;
- Personal data will not be saved or stored on personal devices
- Any paper records held by the Trustee (and its directors) personally will be held in secure premises in lockable cabinets and can only be retained in accordance with the **Data Retention Policy** and must be destroyed in keeping with the **Data Destruction Policy**; and
- Any projects to be undertaken which involve processing of data will be subject to a Data Protection Impact Assessment and any identified data protection issues, i.e. high risk to the rights of an individual(s), will be considered and appropriate steps taken to manage that risk.