

# Data Privacy Statement

We take your privacy seriously. It is important that you know exactly what we do with personal information that you and others provide to us, why we gather it and what it means to you. This document is being provided to you in line with our obligations under the General Data Protection Regulator (GDPR) which came into force on 25 May 2018. From that date, the GDPR, together with applicable Irish requirements, will amend existing data protection law and place enhanced accountability and transparency obligations on organisations when using your information. The GDPR introduced changes which will give you greater control over your personal information, including a right to object to processing of your personal information where that processing is carried out for our business purposes.

This privacy notice sets out how we collect, use and protect your personal information and your rights in relation to your information. Please take time to read this notice carefully. If you have any questions about how we use your information, please contact us at the details below.

**Personal information** is any information, or a combination of pieces of information, that could reasonably allow you to be identified.

## Personal Information We Use

We hold or will collect personal information about you from a variety of sources, including information from you directly, information provided by your fund provider and information we get from other sources, including public databases.

## What Information may we collect directly from you?

The categories of personal information that we collect directly from you include:

- personal details (for example, your name, date of birth, marital status);
- your bank details and Personal Public Service Number (PPSN);
- your contact details (for example, your address, phone number and email address);

- your identification document (for example, your passport or driving licence, utility bills or bank statement);
- details about whom you would like us to consider paying benefits to if you die;
- if you have paid additional voluntary contributions or if you are a member of a defined contribution scheme, your choice of fund for investing contributions.

### **What information may we collect from other sources (such as your Employer)?**

These are examples of categories of information we may collect from other sources:

- personal details (for example, your name, date of birth, marital status);
- your contact details (for example, your address, phone number and email address);
- information necessary to calculate and pay your contributions or benefits (for example, your employment history and salary).

### **How will we use your personal information and why?**

The ways we use your information include:

- identifying you and your survivors and making sure your details are up to date;
- communicating with you;
- calculating and paying your benefits;
- Implementing trustee decisions - such as whether to agree to early retirement or how to distribute benefits after your death;
- if you have paid additional voluntary contribution to the scheme or if you are a member of a defined contribution scheme, we may use your information to decide how to invest assets allocated to your account.

We must have a legal reason to use your personal information. This will usually be one of the following:

- to fulfil our legal obligations (including any contractual obligations), which includes making sure that your benefits are paid correctly;
- to meet our legitimate interests to administer a scheme efficiently;
- to meet the employer's legitimate interests in managing the scheme;
- because using the information is necessary in relation to a legal claim.

In a few cases, especially where you have given us information about your health, we need your consent to process your data. Where this applies, you may take back your consent at any time by contacting us using the contact details listed below.

### **Legitimate Interest**

We use your personal information for our legitimate interests as shown below. This doesn't affect your privacy rights. We have taken account of any privacy risks and ensured that your data protection rights are not affected.

- Call Recording. For customer service, we record and monitor calls. We let you know that all calls are recorded at the start of the call.
- Customer Queries and Service Requests. When you send us a query or a request a service, such as a call back, we will collect and use the personal details needed to respond to your request.

### **Information Sharing**

In some circumstances we may share personal information with a pre-approved list of parties and only for the purpose which is necessary to fulfil legal obligations. For example:

- our advisers such as our auditors and our legal advisers;
- the trustee of the transferring scheme;
- the regulators, including the Central Bank of Ireland, Pensions Authority and the Data Protection Commission.
- government organisations such as Revenue Commissioners and Financial Services and Pensions Ombudsman;
- law enforcement and other appointed agencies and the courts as required or permitted by laws, rules, regulations or legal processes.

We may also provide some of your personal information to your employer to help it make decisions relevant to its role as a sponsoring employer of a scheme. We will only do so to the extent we consider necessary for these purposes.

### **Security and Storage**

We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.

When sharing your personal information with our administrators or another third party we will make sure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the agreed purposes.

We will keep your personal information for as long as is necessary. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations.

### **Your Rights**

You have rights regarding your personal information, including the right in certain circumstances to access, correct, delete or transfer your personal information or to restrict or object to our use of it. We may need extra information from you to in the event of such a request. If you would like to discuss or exercise these rights, please contact us.

### **International Data Transfer**

Your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law. Where your personal information is to be transferred outside Ireland (for example by the administrator) we will make sure that there are appropriate safeguards in accordance with applicable legal requirements to protect the information. For more information on any safeguards in place, please contact us.

### **Changes to this Policy**

We may update this privacy notice from time to time. Updates are effective from the date on which they are notified to members or posted on the website (<https://www.apworkplacepensions.com>).

### **How to Contact Us**

If you have questions or concerns, please contact:

Head of Compliance

Apex Business Centre Blackthorn Road

Sandyford

Dublin D18 N2T6

Tel: 01 2063010

[info@apworkplacepensions.com](mailto:info@apworkplacepensions.com)

If you believe that we have not resolved your concerns, you can complain to the Office of the Data Protection Commissioner at [info@dataprotection.ie](mailto:info@dataprotection.ie).



We encourage you to let us know if your personal information changes or if the information we hold about you is out of date.

*Revision date: 11<sup>th</sup> February 2020*