

## **Privacy Notice**

Pillar 2 Pension Trustees Limited (“Pillar 2” or “we”) is a data controller in accordance with data protection laws, including the European Union General Data Protection Regulations (GDPR).

As trustees and/or registered administrators (our “services”) we collect, hold and process Personal Data. Personal Data is any information about an identifiable person (“individual”), such as name, address, email address, date of birth, salary etc.

The purpose of this Privacy Statement is to inform individuals about the Personal Data that we hold and why, where we get it from, whom we share it with and what individuals’ rights are.

Pillar 2 is aware of the importance of keeping Personal Data secure and adopt appropriate policies and procedures to comply with the requirements of GDPR. Third parties who process Personal Data are required to have effective data protection procedures and security arrangements in place.

### **Sources of Personal Data**

We collect Personal Data directly from individuals (for example when they join a pension scheme) and from other parties, particularly employers and service providers. We may also collect information from government agencies, publicly available sources and from other pension schemes, advisers and/or pension product providers where individuals have transferred benefits into a scheme or are transferring benefits out of a scheme.

Where an individual provides us with Personal Data from which other people can be identified, such as their dependants, the individual should tell those other individuals that their personal data has been provided to us and provide a copy of this privacy statement to them.

### **Why we hold Personal Data**

We gather and process Personal Data for a variety of reasons and rely on different legal bases to carry out that processing. In general, we will use Personal Data:

- For the purposes of complying with our legal obligations under pensions and other legislation.
- For the purposes of an individual’s participation in a scheme, including complying with the scheme’s governing documents and trust law, paying benefits as they fall due, reaching decisions in relation to the exercise of discretionary powers and communicating with the individual in relation to membership of the scheme;
- where the processing is required in connection with Pillar 2’s legitimate purpose, such as promoting the proper and efficient administration of schemes. This might

- include taking advice from external actuarial, legal and other advisors, purchasing insurance and meeting the expected standards of scheme governance; and
- Where individuals have consented to processing of Personal Data for a particular purpose. If individuals give consent for Pillar 2 to use their Personal Data for a particular purpose, they have the right at any time to withdraw consent to the future use of their Personal Data for some or all of those purposes by writing to Pillar 2 at the address specified below. Note that this may affect the individual's benefits.

### **What Personal Data we hold**

As trustees and/or registered administrators, we process the following Personal Data:

- Personal details such as name, gender, Personal Public Service Number (PPSN), date of birth
- Contact details such as address, email, telephone numbers
- Financial information such as bank account details, where these are needed to pay benefits
- Employment details such as date of joining employment, date of leaving, periods of part-time service, salary
- Pension information such as pension contributions paid by Individuals and by their employer, investment choices, pension fund valuations, and choices made in relation to the payment of pension benefits
- Marital status and information on dependants and other potential beneficiaries, Pension Adjustment Orders
- Sensitive information, such as information on health.

### **Whom we share Personal Data with**

We have appointed third parties who provide administration and other services to schemes, including registered administrators and pension consultants, actuaries, auditors, insurers, risk managers, and legal advisers. We share Personal Data with these service providers as required for the efficient operation of schemes and to ensure that appropriate controls are in place for the governance, management and security of schemes. We may also share information with government agencies, for example, if we have lost contact with individuals. Personal Data may also be shared with employers for the purpose of clarifying individual member benefit entitlements and to allow an employer to review the effectiveness and operation of their scheme. Where individuals opt to transfer their benefits to another pension scheme or product provider, we will provide information as required to the trustees of the pension scheme or product provider.

In any case where Pillar 2 shares Personal Data with a third-party data controller, the use by that third party of the Personal Data will be subject to the third party's own privacy policies.

### **Transfers outside the EEA**

Some of the parties we share Personal Data with may process it overseas. This means that Personal Data may on occasion be transferred outside Ireland and, in some instances, the European Economic Area. Some countries already provide adequate legal protection for Personal Data, but in other countries, additional steps will need to be taken to protect it. We will ensure that any transfers of Personal Data outside of Ireland, which we or our processors make, are carried out in accordance with applicable data protection laws and that appropriate safeguards are implemented.

### **Sensitive Personal Data**

Pillar 2 may, in limited circumstances, collect and process sensitive Personal Data in connection with their legal obligations under pensions legislation, a scheme's governing documents and trust law obligations. Any sensitive Personal Data will only be used and disclosed, as necessary, for such purpose. An individual's explicit consent may sometimes be sought in order for us to process their Personal Data.

### **Updates to Personal Data**

Pillar 2 will use reasonable efforts to keep Personal Data up to date. However, individuals will need to notify Pillar 2 without delay in the event of any relevant changes so that Pillar 2 can keep the Personal Data up to date.

### **How long is Personal Data retained**

An individual's Personal Data will be retained for as long as we deem necessary to ensure that their benefits have been administered in accordance with the rules of a scheme. In practice this means that Personal Data may be held for up to thirteen years following the winding up of a scheme or the cessation of the provision of services.

### **Data Subject Rights**

Individuals have certain rights under GDPR in relation to their Personal Data. These rights include the right to access their Personal Data and to rectify any errors in the information being held. Individuals also have the right to object to or restrict the processing of Personal Data or to request erasure of information.

These rights must be considered in the context of Pillar 2's legitimate interest in paying benefits to individuals and/or their dependants.

In any case where Pillar 2 is relying on an individual's consent to process their Personal Data, the individual has the right to change their mind and withdraw consent.

These rights can be exercised by writing to Pillar 2 at the address specified below.

### **Contact Information**

Should you have any questions in relation to this Privacy Statement or wish to contact Pillar 2, you can contact:

Company Secretary  
Pillar 2 Pension Trustees Limited  
20 Harcourt Street  
Dublin 2  
[info@pillar2.ie](mailto:info@pillar2.ie)

If any questions are not resolved to your satisfaction, you can raise the matter with the Data Protection Commission. Contact details can be found at:

<https://dataprotection.ie/en/contact/how-contact-us>