



Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

# GDPR Pension Privacy Notice

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# Privacy Notice for Members of the Central Bank of Ireland Pension Scheme

From 25th May 2018, GDPR and related legal enactments existing data protection laws were amended, which placed enhanced accountability and transparency obligations on pension trustees when using members’ personal data. GDPR also introduced changes that will give individuals greater control over their personal information.

The security of our members’ personal information is extremely important to us and we are committed to complying with the enhanced obligations and responsibilities that GDPR will bring.

This Privacy Notice ("Notice") sets out the basis on which the trustees of the Central Bank of Ireland Pension Scheme (“we” or “us”) use any personal information (“Personal Data”) detailed below which we collect from you or that you provide to us. The information provided by you will be held by us as a data controller.

## 1. Overview

- 1.1. We will use your information in accordance with this Notice.

## 2. What information do we collect?

- 2.1. We have set out below examples of the types of information we may collect about you. We may receive this information from you, from third parties such as the Central Bank, a life assurance company or a pension brokerage, and from publicly available information.
- 2.2. Where you provide information about other people (such as a spouse, partner or child) you are responsible for ensuring, in so far as is practical, that they know we are using their Personal Data in accordance with this Notice.

Information we may collect	Examples
Basic personal details	Name Date of birth Gender Marital/Civil Status Contact details PPS number

<b>Proof of identity</b>	Passport Driver's licence Utility bill Birth certificate Marriage/Civil partnership certificate
<b>Family details</b>	Details of your: <ul style="list-style-type: none"> <li>• Spouse</li> <li>• Partner</li> <li>• Next of kin</li> <li>• Dependants</li> <li>• Designated beneficiary or trustee</li> </ul>
<b>Financial information</b>	Salary Bank details
<b>Professional advisers' details</b>	Details of your: <ul style="list-style-type: none"> <li>• Financial advisers</li> <li>• Accountant</li> <li>• Solicitor</li> </ul>
<b>Employment details</b>	Length of service Salary Tax details Places and types of work carried out Retained benefits Employee reference number
<b>Demographic information</b>	Eircode
<b>Other</b>	Any other information you may choose to provide us with

### 3. Legal bases and purposes for using your information

3.1. The table below details the key contexts for which ("Legal Basis") and why ("Purposes") we collect, obtain and process your Personal Data, and describes with whom we may share your Personal Data. Not every processing operation detailed below will apply to every individual. We will only collect, obtain and process your information where we have a valid reason to do so and we have three primary reasons for using your information.

NECESSARY FOR ENTERING INTO OR PERFORMANCE OF A CONTRACT	
<b>Legal Basis</b>	It is necessary to process your Personal Data to enter into and perform our contract with you.
<b>Important</b>	You are obliged to provide us with your Personal Data as it is necessary to enter into a contract with us and the consequences for not doing so are that we will not be able to manage and administer your pension and/or life assurance benefits.
<b>Purposes</b>	We obtain, collect and process your Personal Data for the purposes of: assessing and processing a pension application; responding to your enquiries; managing and administering your pension or life assurance benefit; dealing with claims; and managing our relationship with you (for example tracing you when we've lost touch, to reunite you with the benefits of your pension).

LEGITIMATE INTERESTS	
<b>Legal Basis</b>	We have a legitimate interest to process your Personal Data as the Personal Data may in the future be required to establish the proper management of the pension scheme.
<b>Important</b>	Before we process your Personal Data to pursue our legitimate interests for the above purposes, we determine if such processing is necessary and we carefully consider the impact of our processing activities on your fundamental rights and freedoms. On balance, we have determined that such processing is necessary for our legitimate interests and that the processing which we conduct does not adversely impact on these rights and freedoms.
<b>Purposes</b>	We obtain, collect and process your Personal Data for maintaining third party service quality (e.g. third parties may monitor and/or record calls to their customer service teams for authentication, security, quality and training purposes).

NECESSARY AS A LEGAL REQUIREMENT	
<b>Legal Basis</b>	It may be necessary to process your Personal Data in order to comply with a legal obligation.
<b>Purposes</b>	We may process your Personal Data in order to comply with obligations imposed on us by applicable Irish and European Union laws.

Who do we share information with?	Why?
Service providers Actuaries (both Employer and Trustee appointed), Solicitors (PAOs)/LPRs, Auditors (Payroll checks, testing)	We use third party service providers so we can administer your pension and/or life assurance benefits and deliver a service to you e.g. providers of pension administration services that manage your information and search services that help us trace you if we have lost touch.
Anyone you ask us to	If you ask us to share your information with anyone we will, e.g. trust administration, a professional adviser, etc. We may check with you to confirm that a person asking for information on your behalf has your authority to do so.
Regulatory, government and industry bodies	To comply with our legal and regulatory obligations, which may include best practice, we may have to share information with such bodies, in particular: <ul style="list-style-type: none"> <li>• The Revenue Commissioners</li> <li>• The Pensions Authority</li> <li>• Fraud Prevention Organisations</li> <li>• Financial Services &amp; Pensions Ombudsman</li> <li>• Law enforcement bodies</li> </ul>
Courts and those involved in any legal process	We will comply if a court requires us to disclose your information or if it needs to be disclosed as part of a legal process.

## 4. Where do we send your information?

- 4.1. We do not directly transfer your Personal Data outside of the European Economic Area (EEA).
- 4.2. Your Personal Data may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for Personal Data under European Union law by third party processors engaged by us. In such cases we ensure that these third parties have put in place appropriate safeguards such as contractual commitments in accordance with applicable legal requirements to ensure that your Personal Data is adequately protected. If you would like to find out more about the appropriate safeguards that we have in place to govern the transfer of your Personal Data, you can contact us using the details in Section 11.

## 5. What if you don't provide Personal Data?

- 5.1. We will not ask you for Personal Data that we don't need. If you do not provide certain information (e.g. if you don't provide the information requested on an application form) then we may not be able to carry out our duties as a trustee and administer your pension benefits. When we ask you for your information, we will try to set out clearly what information we really need and what information is essential for the provision of your pension benefit.
- 5.2. If you don't want to provide certain information but are not sure of the impact that will have on the service, please get in touch using the contact details in Section 11.

## 6. Your rights

- 6.1. We have set out below your rights but to keep things simple we have not included all the circumstances or conditions which apply to them. If you would like to exercise these rights, please contact us using the contact details in Section 11. If for any reason the right is limited or doesn't apply, we will explain to you why this is the case.

Right	Further Information
<p><b>Right of Access</b></p>	<ul style="list-style-type: none"> <li>• You have the right to request a copy of the Personal Data held by us about you and to access the following information in relation to the processing of your Personal Data:                             <ol style="list-style-type: none"> <li>(1) the purposes of processing;</li> <li>(2) the categories of Personal Data concerned;</li> <li>(3) the recipients of your Personal Data;</li> <li>(4) the period for which your Personal Data will be stored;</li> <li>(5) the existence of your right to lodge a complaint with the Data Protection Commission; and</li> <li>(6) the source of your Personal Data.</li> </ol> </li> </ul> <p>We will only charge you for making such an access request where we feel your request is unjustified or excessive. For security reasons, we</p>

	will take reasonable steps to confirm your identity before providing you with any Personal Data we may hold about you.
<b>Right to Rectification</b>	You have the right to request that we amend any inaccurate or incomplete Personal Data that we have about you.
<b>Right to Erasure</b>	<p>You have the right to ask us to erase your Personal Data where:</p> <ol style="list-style-type: none"> <li>(1) it is no longer necessary to perform our contract with you;</li> <li>(2) you withdraw your consent and there is no other legal basis permitting us to process your Personal Data;</li> <li>(3) you object to the processing and we have no overriding legitimate grounds;</li> <li>(4) your Personal Data has been unlawfully processed; or</li> <li>(5) it must be erased to comply with a legal obligation.</li> </ol> <p>Sometimes we have to maintain records for legal reasons. If we cannot comply with your request then we will contact you and explain why. If you ask us to stop using your information we will still keep it, but we will not do anything with it.</p>
<b>Right to Restriction of Processing</b>	<ul style="list-style-type: none"> <li>• You have the right to ask us to restrict processing your Personal Data in the following situations: <ol style="list-style-type: none"> <li>(1) where you contest the accuracy of your Personal Data;</li> <li>(2) where the processing is unlawful and you do not want us to delete your Personal Data; or</li> <li>(3) where we no longer need your Personal Data for the purposes of processing, but you require the data in relation to a legal claim.</li> </ol> </li> <li>• When you exercise this right we may only store your Personal Data.</li> <li>• We may not further process your Personal Data unless you consent or the processing is necessary in relation to a legal claim or to protect the rights of another person or legal person or for reasons of important public interest.</li> </ul> <p>We will inform you before the processing restriction is lifted.</p>
<b>Right to Data Portability</b>	<ul style="list-style-type: none"> <li>• You have rights to obtain and reuse your Personal Data for your own purposes across different services. You can request that we transfer information we hold about you to you or a third party in electronic form, where this is technically feasible.</li> </ul>

- 6.2. You also have a Right to Object, whereby you have the right to ask us to stop using your information in pursuit of our legitimate interests, and we will comply unless there is an important reason why we need to continue using it, which we will explain to you.
- 6.3. If we have disclosed the Personal Data in question to a third party (where appropriate), we will also let them know that you have asked us to stop using or retaining your information, and they will comply unless it is not possible to do so, or there are overriding legitimate interests. In either case we will explain the reasons to you.

## 7. How to update your information?

- 7.1. It is important that the information we hold about you is accurate and up to date. Please let us know if your information changes, or the information we hold about you

is incorrect. You can ask us to update or correct your information free of charge using the contact details below.

- 7.2. If we have disclosed the Personal Data in question to a third party, we will also endeavour to let them know about the changes.

## 8. How long do we keep your information for?

- 8.1 Pensions are very long-term arrangements. Benefits can be payable for the life of a member and benefits may be payable to dependents after the death of a member. Questions as to whether benefits are payable can arise decades after a member has transferred their benefits or otherwise opted out of the Scheme. Accordingly, your personal information will usually be retained by the Trustee until thirteen years after the winding up of the Scheme.

## 9. How do we store your information?

We care about protecting your Personal Data, so we put in place appropriate technical and organisational measures and safeguards that are designed to prevent unauthorised access to, and misuse of, your Personal Data. We are committed to taking reasonable steps to protect the Personal Data that we hold from misuse, loss, or unauthorised access.

## 10. Changing this Notice and notifying you

- 7.3. To keep it up to date, or to comply with legal requirements, we may change this Notice from time to time. Any changes we make in the future will be effective immediately upon issuing a notification to you of the revised notice.
- 7.4. If at any time we decide to use your Personal Data in a manner significantly different from that stated in this Notice, or otherwise disclosed to you at the time it was collected, we will notify you by e-mail or post, and you will have a choice as to whether or not we use your information in the new manner.

## 11. Contact details

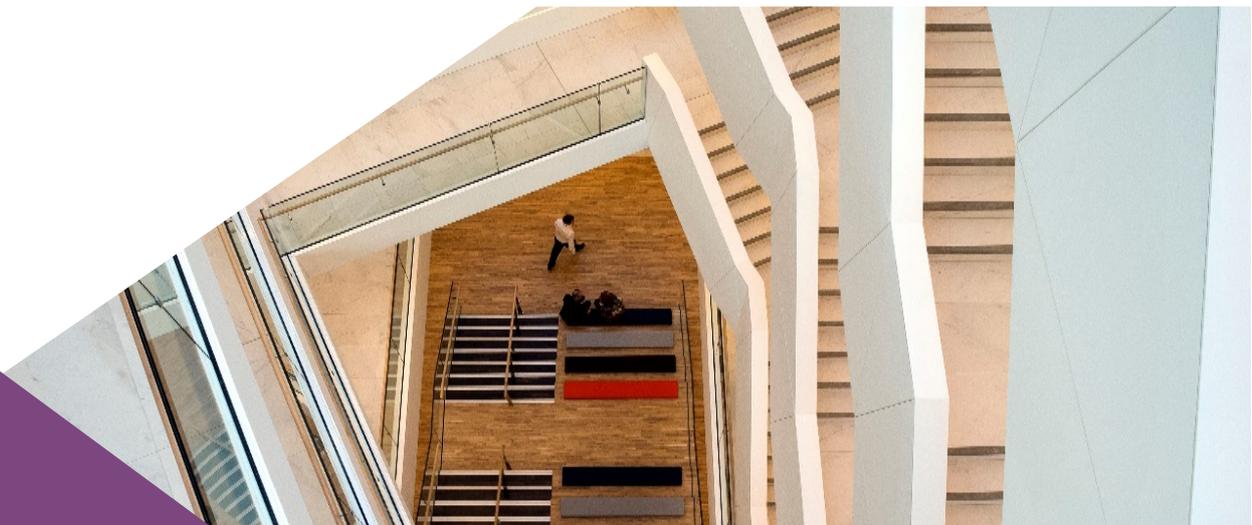
11.1. If you have any questions or concerns about our use of your information or would like a copy of the information we hold about you, please email: [hrsupport@centralbank.ie](mailto:hrsupport@centralbank.ie)

## 12. Complaints

12.1. If you are unhappy with any aspect of the service we provide, please let us know. You have the right to complain to the Data Protection Commission whose contact details are:

Data Protection Commission  
21 Fitzwilliam Square South  
Dublin 2  
D02 RD28

Phone: +353 (0761) 104 800  
LoCall 1890 25 22 31  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)



T: +353 (0)1 224 6888  
hrsupport@centralbank.ie  
www.centralbank.ie



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