

Privacy notice for current and former Scheme members

This privacy notice (“**notice**”) explains how the Relevant Law Debenture Companies (as defined below), (each referred to in this notice as “**LawDeb**”, “**us**” or “**we**”) processes personal data relating to the current and former members of any pension scheme or other employment arrangement such as a life assurance/risk only scheme to which we are appointed as a trustee (referred to as the “**Scheme**” in this notice). A Scheme includes but is not limited to:

- pension schemes to which we are the trustee including corporate sole trustee;
- life assurance/risk only schemes;
- schemes where we were the trustee but are no longer involved or the scheme has wound up.

We are responsible for fulfilling our obligations under the Scheme’s rules and/or other governing documents (referred to as the “**Scheme’s Rules**” in this notice) for the benefit of the Scheme’s members and beneficiaries (referred to as ‘you’ or ‘your’ in this notice).

LawDeb is a data controller of your personal data collected in connection with the Scheme.

The “**Relevant Law Debenture Companies**” means Law Debenture Ireland (Trustees) Limited and - to the extent acting as a data controller - (usually the role will be a data processor unless stated), Law Debenture Pensions Governance Limited.

References to the “**LawDeb Group**” are to the Relevant Law Debenture Companies and their affiliated companies from time to time.

In this notice you can find out more about

- what personal data we process about you and the legal basis for such processing;
- when and why we share your personal data with third parties, including what happens when such third parties are based outside the EU;
- how long we keep your personal data for;
- your rights in relation to any personal data we hold about you; and
- how you can contact us with any questions you may have about data protection at LawDeb.

We will amend this notice from time to time to keep it up to date with current legal requirements and the way we operate our business. Please regularly check lawdebenture.com for the latest version.

What personal data we process and why

The personal data we hold about you may include but is not limited to:

- details that identify and locate you such as name, address, date of birth and PPS number;
- your benefits under the Scheme and related information such as details of salary, service dates, marital status, beneficiaries, employment details, and bank account; and
- details of your other pension arrangements, tax residency status, PAYE coding, and Revenue tax status.

In addition, we may request further data from you or any other relevant third parties to be able to manage your membership of the Scheme.

We collect your personal data directly from you or through the Scheme’s third-party administrator. We may also receive personal data from a number of other parties, including the employer’s payroll and HR providers, the Scheme Actuary, our professional advisers and service providers, other schemes you have been a member of, data analytics companies (e.g. for member tracing, identity and existence checking), regulatory authorities, and government departments.

As a data controller, we do not ask for nor rely on your explicit consent in order to process your personal data. We collect and process your personal data so that we can fulfil our legal duties in line with the Scheme’s Rules and overriding legal obligations, namely:

- to administer the Scheme and establish if you qualify for benefits;
- to exercise a discretion where benefits are paid at the discretion of the trustee e.g. following your death;
- for risk management purposes, including the insurance or management of longevity risks and obtaining quotations for annuities or other insurance products;
- to trace members and other beneficiaries;
- to provide you with information that you request from us or which outlines your choices and options at a particular stage of Scheme membership status;
- to provide targeted communications relevant to your stage of Scheme membership and information about services which can be accessed by Scheme members - which may be offered by other parties, e.g. retirement guidance and/or advice resources;
- to consider and respond to a concern or dispute you have raised;
- to communicate with you about the Scheme; and/or
- to meet responsibilities we have to our regulators, government bodies, tax officials, law enforcement, or otherwise meet our

legal responsibilities as they apply to the LawDeb Group from time to time.

We do not routinely process “sensitive personal data” (also known as special categories of personal data) such as, but without limitation, information concerning your race, sexual orientation, religious beliefs, political affiliations etc. The processing of sensitive personal data may be needed in certain limited circumstances such as when benefits are conditional on certain criteria including health. In such cases, we will only process your sensitive personal data with your explicit written consent. Prior to collecting and processing any sensitive personal data, we will ask you to complete a consent form explaining what sensitive personal data we need and why we need it.

When and why we share your personal data

We are committed to respecting your privacy and will share your personal data only with a number of trusted third parties who work with us to help deliver our services, in order to fulfil our legal obligations, and/or at your request, including but not limited to:

- other members of LawDeb Group, as necessary to operate our business and provide support services to Schemes;
- third-party Scheme administrators;
- your employer;
- insurers (if any);
- professional service firms who provide us with legal, audit, actuarial and consultancy services, and other support;
- service providers who help operate our IT, security, storage and back office systems; and
- regulators and other authorities, including The Pensions Authority, The Revenue, and the Data Protection Commissioner's Office (the “DPC”).

In addition to the above, we may share your personal data:

- with third parties to whom we may need to disclose personal data in order to comply with a statutory obligation (for example, in response to a court order or a law enforcement agency's request);
- if the law requires or permits disclosure, or we have a duty to the public to share or disclose your personal data; and/or
- with any third party at your request.

Once we receive your data, we use appropriate procedures and security features to prevent unauthorised access. We require any third-party service providers who act as data processors for us to do so too.

We require any third-party service provider who acts as a data processor for us to comply with applicable data protection laws as part of our contract with them. These service providers may, with our agreement, sub-contract certain processing activities, for example to external printing companies, data analytics providers, or software providers. Before doing so, they must check that the sub-contracted service provider has adequate security measures in place.

Protecting personal data outside the EEA

Some of the organisations we share your personal data with may be located outside of the European Economic Area (“EEA”). We will always take steps to ensure that any transfer of personal data outside the EEA is in accordance with legal requirements and is carefully managed to protect your privacy rights. This may include, but is not limited to the following measures:

- transfers within the LawDeb Group will be covered by an agreement entered into by members of the LawDeb Group (an intra-group agreement) which contractually obliges each member to ensure that your personal data receives an adequate and consistent level of protection wherever it is transferred within the Group;
- where we transfer your data to non-LawDeb Group parties we will obtain contractual commitments and assurances from them aligned with legal requirements to protect your personal data;
- we will only transfer personal data to countries which are recognised by the EU as providing an adequate level of data protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights; and
- any requests for personal data we receive from law enforcement, regulators, government bodies, or other authorities will be carefully validated before any of your personal data is disclosed.

You have a right to ask us for more information about the safeguards we have put in place as mentioned above. To learn more, please see the “Your rights” section below.

How long do we keep your personal data

Pension benefits are earned and paid over a prolonged period, typically many decades. We will store and process your personal data for as long as necessary to comply with our legal obligations, pay benefits in line with the Scheme's Rules and deal with any queries about your benefits or those of your beneficiaries after your death.

Our service providers and advisers will typically retain your personal data for a certain period after

our agreement ends with them. This is to enable them to deal with queries into the future and protect themselves against legal claims.

It is important to ensure that the personal data we hold about you is accurate and up to date, for example, if you move home or change your phone number or email address. To manage your details, contact the Scheme's third party administrator.

Schemes where we were the trustee but are no longer involved or the Scheme has wound up

For Schemes which have been transferred to another trustee, we may retain your personal data for as long as it is necessary to ensure an effective transition to the new trustee and thereafter to keep a record in respect of decisions made whilst we were a trustee.

In cases where the Scheme has been wound up and the sponsoring employer no longer exists, we may be the only source of information. This means that it may be necessary to retain your personal data for longer to ensure that we will be able to address any questions concerning your membership or benefits status.

Your rights

You have the following rights in relation to your personal data:

- the right to be informed about how your personal data is collected and being used;
- the right to access the personal data we hold about you;
- the right to request the correction of inaccurate personal data we hold about you;
- the right to request the erasure of your personal data in certain limited circumstances;
- the right to restrict and/or to object to the processing of your personal data where certain requirements are met;
- the right to request that we transfer elements of your personal data either to you or another service provider; and
- the right to object to automated decision making processes using your personal data, if any.

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information to the right individual.

In certain circumstances, we may not be able to do what you have asked, for example due to legal or regulatory requirements or if it would impact the duty of confidentiality we owe to others.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the

"Contacting us" section below. More information about your legal rights can also be found on the DPC's website at

<https://www.dataprotection.ie/en/individuals>

Making a complaint

If your complaint is regarding your benefits rather than your data itself, we strongly advise you to contact the third party administrator relevant to the Scheme as it is likely that your complaint will be addressed through a faster channel.

Other considerations

Expression of wishes in the event of your death

You may also tell us who you would like the trustee to consider when exercising discretion over payment of death benefits (the "**Beneficiaries**"). Where relevant (for example, the Beneficiaries are not your minor children), please ensure that you have the Beneficiaries' consent to share their personal data with us.

Third parties and third party websites

Third parties such as your employer, any insurers, and any actuary and legal advisers appointed in relation to the Scheme may also process your personal data in accordance with their own policies and as data controllers in their own right rather than as our data processors. In addition, Scheme communications and our website may, from time to time, contain links to third-party websites. These websites have their own data privacy policies.

Please note we do not accept any responsibility for the content of third party policies and/or the third party's use of your personal data. It is your responsibility to check those policies before you submit any personal data to these third parties.

Someone else acting for you

If you appoint someone to manage your benefits and deal with us on your behalf, we may perform additional checks to ensure they have full authority to act on your behalf and to provide us with your personal data for us to use in accordance with this privacy policy.

Contacting us

In the event of any query or complaint in connection with the personal data we hold about you, please email dp@lawdeb.com or write to us at 38/39 Fitzwilliam Square W, Dublin 2, D02 NX53, Ireland. In both cases, please refer to the name of the Scheme.