

The National Federation of Voluntary Bodies

Pension & Life Assurance Scheme

Data Protection Notice – (DPN)



Who We Are And What We Do?

The National Federation of Voluntary Bodies Pension and Life Assurance Scheme was established in 1996 to provide pension and life assurance benefits for employees of participating employers within the Federation.

The Scheme is established under Trust and individual trustees have been appointed to look after your interests as a member of the Scheme. The following named individuals act as trustees for the NFVB Pension and Life Assurance Scheme.

- Bernard O'Regan (Chairperson)
- Francis Coughlan
- Tony Darmody
- John McHugo
- John O'Dea
- Brian O'Donnell

As trustees our primary aim is to ensure that the pension scheme of which you are a member, operates in a compliant manner and that your interests as a member and those of your beneficiaries are looked after. This is achieved by applying robust governance processes to all aspects of our role as trustee including protection of your personal data.

As a member of the scheme, the Trustees collect, maintain and process certain information about you, and potentially, your spouse/partner and dependents ("personal data"). This data is subject to the European Union General Data Protection Regulation ("GDPR") and associated Regulations, which provide for the safety and security of personal data and gives you certain rights in relation to your personal data. GDPR is effective from the 25th May, 2018. As trustees we will use your information in accordance with this notice.

Please take time to read this notice carefully. If you have any questions about how we use your

information, contact our Pension Manager - details below.

What Information Do We Collect?

We, and third parties that we have appointed to administer the NFVB Pension and Life Assurance Scheme, will collect a range of personal information about you. The exact information will depend on the products and services that you use. We have set out below examples of the types of information that may be collected about you. This information may be received from you, from your employer, a life assurance company, pension advisors, other third parties and from publicly available information.

Where we ask for, or you voluntarily provide, special categories of personal information this will only be used with your consent and to provide you with the service you have requested or to help us to understand your specific circumstances and make appropriate adjustments to the service we offer. An example of a special category of personal information is data about your health to consider an application from you for early retirement on health grounds.

If you provide information about other people (such as a spouse, partner or child noted on an Expression of Wishes Form) we understand that you have ensured that:

- a) They are aware that we have been given their data and that we are using their personal information in accordance with this privacy notice; and that
- b) You have obtained their consent for their data to be used.

Examples of personal data that may be collected include basic personal details, proof of identity, family details, financial information, employment details and health information.

How We Use Your Information?

We – and third parties appointed by us, use your information to:

Administer your pension and/or life assurance benefit including:

- establishing you as a member of the scheme;
- dealing with your enquiries;
- ongoing administration of your pension or life assurance benefit;
- dealing with any claims that may arise, if you leave service, retire or die;
- tracing you and /or your dependents.

Meet legal and regulatory obligations including:

- anything we are required or permitted to do to meet our regulatory responsibilities;
- legal and good governance obligations;
- obligations we have in relation to the prevention and detection of crime (such as money laundering).

Legal Basis For Using Information:

We will only collect, use and share your information where we have a valid reason to do so. We have 3 main reasons for using your information:

- a) Contract – In order to manage your membership of the pension and / or life assurance scheme (the contract); we need to collect and store certain information from you e.g. employment details.
- b) Legal obligation – we may need certain information from you and / or your beneficiaries in order to meet our legal obligations e.g. proof of identity to meet our anti-money laundering obligations.
- c) Its use is in accordance with our legitimate

interests e.g. to manage our business, subject to those interests not over-riding your fundamental rights and freedoms.

Consent:

In certain circumstances we need your consent to process special categories of personal information about you e.g.

- a) Health information to see if you qualify for ill health retirement benefits;
- b) Details of your partners / beneficiaries to assist us in determining to whom any lump sum death benefit should be paid.

You have the right to withdraw your consent at any time but in respect of health data we may not be able to process your claim as a result.

Who Do We Share Your Information With?

We share your information with pension administrators to enable your pension and life assurance benefits to be administered; third parties such as auditors who we need to employ to audit the Trustee Annual Report; regulatory bodies and the courts as required to comply with any legal and regulatory obligations we have to meet; any new trustee that may be appointed and anyone that you specifically request us to share your information with.

Where Do We Send Your Information?

Normally any information collected in your respect will be stored in the Republic of Ireland. However, sometimes the information that we collect from you and/or is collected on our behalf may be viewed from, transferred to or stored, outside the European Economic Area (EEA).

We ensure that we put in place appropriate safeguards when we allow your information to be processed outside the EEA – either by the trustees or by a Data Processor – such as the pension administrator that we appoint to act on our behalf.

Please contact us using the details below if you would like more information on the appropriate safeguards we have in place.

What If You Don't Provide Personal Information?

We try not to ask you for personal information that we don't need. If you do not provide certain information we may not be able to provide our service to you e.g. if you don't provide the information requested on an application form we may not be able to process your membership. We will try to make clear what information we really need and what information would help us but is not essential. 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 at the end of this notice.

Your Rights:

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 on the numbers below. If for any reason the right is limited or doesn't apply we will explain to you why this is the case.

You have a right to:

- Find out if and/or how we use your information, to access your information and to receive copies of the information we have about you.
- Request that inaccurate information is corrected and incomplete information updated.
- Object to particular uses of your personal data for our legitimate business interests. However,

doing so will have an impact on the services and products we can / are willing to provide.

- Have your data deleted or its use restricted – you have a right to this under certain circumstances.
- Transfer your information to another provider, known as the right to data portability.
- Withdraw consent at any time, where any processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on consent before its withdrawal.

How To Update Your Information?

It is important that the information we hold about you is accurate and up to date. Please let us know if your information changes (e.g. details of the beneficiaries you have noted on an Expression of Wishes form), 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.

How Long Do We Keep Your Information?

We will not keep your information for longer than is necessary. Different information needs to be held for different periods of time. This may be due to a variety of reasons including legal obligations, to enable us to provide you with a good service and to deal with historic queries that may arise. If you require additional information on our data retention policy please contact us using the details on page 5.

Changing This Privacy Notice:

To keep it up to date, or to comply with legal requirements, we may change this privacy notice from time to time. Any changes we make in the future will be posted on this page and, where appropriate, notified to you.

Contact Details:

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 write to:

Pension Manager

National Federation of Voluntary Bodies
Oranmore Business Park, Oranmore, Co. Galway

Telephone: +353 (091) 792 316

Email: info@fedvol.ie

Complaints:

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 Commissioner whose contact details are:

Office of the Data Protection Commissioner

Canal House,
Station Road,
Portarlinton,
Co. Laois,
R32 AP23

Telephone: +353 (0761) 104 800

LoCall: 1890 25 22 31 |

Fax: +353 57 868 4757 |

Email: info@dataprotection.ie

National Federation of Voluntary Bodies

Oranmore Business Park

Oranmore

Galway

Telephone: 091-792316