

National Federation of Voluntary Service Providers'

Pension & Life Assurance Scheme

Data Protection Notice – (DPN)



Who We Are And What We Do?

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

The Scheme is established under Trust, and individual Trustees have been appointed to look after your interests as a member of the Scheme.

As Trustees, our primary aim is to ensure that the Pension & Life Assurance Scheme, of which you are a member, operates in a compliant manner and that your interests as a member, and those of your beneficiaries and dependants, are looked after. This is achieved by applying robust governance processes to all aspects of our role as Trustees, 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 dependants and beneficiaries. This information is subject to the European Union General Data Protection Regulation (GDPR) and associated legislation, 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 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 Scheme Manager, contact details on page 6.

What Information Do We Collect?

We, and third parties that we have appointed to administer the 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, personal information and/or special categories of personal information this will only be used 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.

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

An example of a special category of personal information is data about your health required in order 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 they are aware that we have been given their information and that we are using their personal information in accordance with this notice.

How We Use Your Information?

We, and third parties appointed by us, use your information to administer your pension and/or life assurance benefits including:

- establishing you as a member of the Scheme.
- dealing with your enquiries.
- ongoing administration of your pension or life assurance benefits.
- dealing with any claims that may arise, if you leave service, retire or die.
- tracing you and/or your dependants.
- 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 anti-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 two main reasons for using your information:

- a. Legal & Regulatory obligations – Necessary for compliance with the legal and regulatory obligations, in particular under the Pensions Act 1990, the Scheme's Trust Deed and Rules and the Taxes Consolidation Act. We may need certain information from you and / or your beneficiaries in order to meet other legal obligations e.g. proof of identity to meet our anti-money laundering obligations.
- b. Its use is in accordance with our legitimate interests e.g. to manage the Scheme, subject to those interests not over-riding your fundamental rights and freedoms.

Consent:

We do not need your consent in order to administer the Scheme. In certain circumstances we may ask you for your consent to process your personal information for particular purposes e.g. to send you information about products and/or services we think may be of interest to you.

Where we have asked you to consent to us using your information for a particular purpose, we will only use it in accordance with the consent you provide.

If we do use consent, then you have the right to withdraw your consent at any time but if you do, we will not be able to process your personal information for the particular purpose as a result.

Who Do We Share Your Information With?

We may share your information with:

- pension administrators & insurers to enable your pension and life assurance benefits to be administered.
- employers.
- 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.
- Consultants, advisors and Key Function Holders appointed to the Scheme
- banks and other financial service providers.
- printers.
- any new trustee that may be appointed.
- tracing agencies.
- anyone that you specifically request us to share your information with.

Many of these act as independent Data Controllers e.g. the Pension Administrator and the Life Assurance Broker.

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 another Data Controller e.g. the pension administrator or a Processor, that we appoint to act on our behalf.

Please contact us using the details below on page 6 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 of the Scheme.

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 being provided, please get in touch using the contact details on page 6.

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 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 may have an impact on the services and products we can / are willing to provide.
- Have your information 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.

If you would like to ask to exercise these rights, please refer to our contact details on page 6.

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 on page 6.

How Long Do We Keep Your Information?

Information may need to be held for 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. Information about you and your benefits will usually be retained for seven years after the end of our relationship with you and / or your beneficiaries and dependants.

If you require additional information on our data retention policy, please contact us using the details on page 6.

Changing This Data Protection Notice:

To keep it up to date, or to comply with legal requirements, we may change this Data Protection Notice from time to time. Any changes we make in the future will be posted on www.fedvol.ie and, where appropriate, notified to you.

Queries:

If you have any queries in relation to Data Protection or if you are unhappy with any aspect of the service we provide, please let us know.

You can contact the Pension Scheme Manager:

National Federation of Voluntary Service Providers' Pension & Life Assurance Scheme,
Oranmore Business Park, Oranmore,
Galway, H91 TP2W

Telephone: 091 792316 or 087 9961104

Email: pensionadmin@fedvol.ie

Complaints:

You have the right to complain to the Data Protection Commission whose contact details are:

Data Protection Commission
6 Pembroke Row,
Dublin 2,
D02 X963

Telephone: +353 (01) 765 01 00

LoCall: 1800 437 437

Email: info@dataprotection.ie

