

Data Protection Policy

July 2026



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Pension Authority No: PB67866 Revenue Approval No: SF7346

PENSION TRUSTEES: Mr. James Skehan (Chairman and Professional Trustee); Mr. John McHugo (Vice Chairman); Ms. Pauline Brennan; Mr. Francis Coughlan; Ms. Deirdre Herlihy and Mr. Bernard O'Regan.

1. OVERVIEW:

The Trustees of the National Federation of Voluntary Service Providers Pension & Life Assurance Scheme, (the “Scheme”) are committed to protecting the personal data of members and beneficiaries. This Data Protection Policy sets out how that commitment is put into practice. As data controller, the Trustees process this personal data in accordance with applicable data protection laws including the General Data Protection Regulation (“GDPR”) and the Data Protection Act, 2018. GDPR and related legal legislation place enhanced accountability and transparency obligations on Pension Trustees when using members’ personal data. GDPR also gives individual members greater control over their personal information.

The Trustees consider the security of members’ personal information as extremely important and are committed to complying with the obligations and responsibilities that GDPR brings.

This Policy notes the obligations of the Trustees and its data processors where they use any personal information (Personal Data) detailed below, which is collected from a member, beneficiary or Trustee or that they provide.

2. ACCOUNTABILITY:

The Trustees have overall responsibility for this Policy and compliance with data protection legislation.

The Trustees have delegated responsibility for dealing with data protection matters to the Data Protection Team. The Data Protection Team will comprise the Pension Scheme Manager and the Professional Trustee. The Data Protection Team will ensure that the Scheme maintains adequate records of its processing and compliance with data protection legislation. Any issues that arise in relation to data protection will be reviewed and managed by the Data Protection Team and reported to the Trustees. The Data Protection Team may seek appropriate external assistance as required. The Data Protection Team will provide a regular report to the Trustees on data protection matters, including data breaches and Data Subjects rights requests.

3. PERSONAL DATA:

Personal data is any information or data relating to an identified or identifiable person (Data Subjects). This includes hard copy information and any information stored electronically.

Special Categories of Personal Data is any information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

The types of personal data, including special categories of data, that the Scheme processes is set out in Appendix 1.

4. DATA PROTECTION PRINCIPLES:

The Trustees will comply with the principles of data protection set out in the GDPR as follows:

Lawfulness, Fairness and Transparency:

The Trustees will obtain and process personal data lawfully, fairly and transparently in relation to Data Subjects.

Lawfulness:

It is necessary to use personal data to include and maintain a member in the Pension & Life Assurance Scheme and the processing of personal data is permitted in compliance with data protection legislation and relies on one or more of the following legal grounds:

- (a) Processing is necessary for compliance with the legal and regulatory obligations, in particular under the Pensions Act 1990 to 2021, the Scheme's Trust Deed & Rules, and the Taxes Consolidation Act; or
- (b) Processing is necessary for the purposes of a legitimate interest in managing, operating and administering the Scheme in a prudent manner which might be:
 - To provide the pension services and to manage the Scheme.
 - To prevent fraud.
 - To ensure that complaints are investigated.

The Trustees will refrain from processing any special category data relating to a member unless the Trustees deem it to be proportionate and necessary and where there is an appropriate legal basis to process it:

- Processing is necessary in accordance with Section 50(a) or 50(c) of the Data Protection Act 2018.
- Processing is necessary for the purposes of exercising and performing rights and obligations conferred or imposed on the Trustees, in connection with employment law in accordance with Article 9(2)(b) GDPR and Section 46 of the Data Protection Act 2018.

In practice, this means that the Trustees can process personal data without consent where required to run the Scheme. The Trustees may in some instances seek consent, for example:

1. Request member consent to use personal data for a specific purpose, including where required under s12 Electronic Commerce Act 2000; and/or
2. Process a member's personal data (including "special categories of data") in order to protect the vital interests of the member or the interests of another member.

Fairness:

The Trustees will use personal data only in ways that our data subjects would reasonably expect and ensure that the processing of the data does not have an unexpected or unjustified adverse effect on our data subjects.

Transparency:

The Trustees will be transparent on its data processing and will make available a Data Protection Notice for our data subjects in an intelligible form using clear and plain language. The Data Protection Notice may be published on the Scheme's website or in booklet format.

Purpose Limitation & Lawful Basis:

The Trustees will ensure that it and its Data Controllers and Processors will not process personal data for any purpose other than those noted above and as communicated to the data subjects.

Purpose	Lawful basis under GDPR
Administering the Scheme, including the	Necessary for compliance with the legal and regulatory obligations, in particular under the Pensions Act 1990 to 2021, the Scheme's Trust Deed and Rules and the Taxes Consolidation (per Art 6(1)(c)) and/or

Purpose	Lawful basis under GDPR
calculation and payment of benefits	Necessary for the purposes of a legitimate interest in managing, operating and administering the scheme in a prudent manner (per Art 6(1)(f)).
Making Trustee Decisions	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 (per Art 6(1)(c)).
Communicating with members, beneficiaries and dependants	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 (per Art 6(1)(c)).
Dealing with your Queries	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 (per Art 6(1)(c)).
Responding to complaints and legal claims	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 (per Art 6(1)(c) and/or Necessary for the purpose of establishing, exercising or defending a legal claim (Article 9(2)(f) - Special Categories of Personal Data).
Complying with legal and regulatory obligations	Necessary to comply with legal obligations to which the Trustees are subject (per Art. 6(1)(c)).

Data Minimisation:

The Trustees will collect only the personal data set out in Appendix 1 and any other additional data that it may be obliged from time to time by law to collect in connection with its legal obligations (or the obligations of the Scheme's Registered Administrators and Insurers).

Accuracy:

The Trustees are required under existing trust law and statutory obligations to maintain sufficient and proper records. The Trustees must ensure that personal data held is accurate and where necessary kept up to date. The Trustees will comply with a data subject's request to amend any inaccuracy in personal data held.

Data Retention:

Pension schemes are very long-term arrangements. Benefits can be payable for the life of a member, and benefits may be payable to dependants after the death of a member. Questions as to whether benefits are payable can arise long after a member has transferred their benefits or otherwise opted out of the Scheme. Accordingly, member benefit records and related records will usually be retained by the Trustees for as long as the Trustees have a relationship with a data subject or their beneficiaries and dependants, plus a period of up to seven years (see table below). The seven years pertains to the period of time under the Statute of Limitations that claimants could bring a claim. The Trustees may also retain records to investigate or defend potential legal claims.

Personal Data in respect of:	Retention Period
Member benefit records (active, deferred and pensioner members)	Seven years after the winding up of the Scheme.

Beneficiary and dependant records	Retained as part of the related member benefit record (seven years after winding up of the Scheme). Expression of wishes letters for members who die in deferment are retained for one year after notification of death.
Special category data	Retained only as long as necessary to assess and administer the relevant benefit. Where it forms part of a benefit decision it is held with the member benefit record.
Death-in-service and benefit claim records	Seven years after settlement or after winding up of the Scheme, whichever is later.
Records of members who left without a preserved benefit	Seven years after the end of the relationship with the member and their beneficiaries and dependants.
Identity and anti-money-laundering documentation	For the duration of the relationship and the minimum period required under applicable anti-money-laundering legislation thereafter (to be confirmed with the Scheme's advisers).
Financial and accounting records	Retained for seven years after the end of the accounting period, the period required by applicable law and by the Scheme's auditors (effectively 7 years i.e., 6 years plus one).
Scheme governance records	Retained for the life of the Scheme and for seven years after its winding up.
Investment records	Duration of the arrangement plus seven years.
Service-provider contracts and data processing agreements	Duration of the contract plus seven years.
Data breach records	Retained for the period necessary to demonstrate compliance with Article 33(5) GDPR.
Data subject rights request records	Retained for a period sufficient to demonstrate compliance, then securely destroyed.

Minutes of Trustee meetings will be retained for 7 years after the date that the Scheme is wound up. The Trustees note that third party providers such as Irish Life, Cornmarket and Aviva have their own timescales for retaining personal data. Please refer to the Data Retention Policy for additional guidance.

Integrity and Confidentiality:

The Trustees will take appropriate security measures against unlawful processing or unauthorised access to its personal data. The types of technical and organisational measures to be employed are set out in Appendix 1 of the Information Security Policy (referred to in Appendix 2 of this policy).

Failure to Provide Personal Data:

If a member does not provide certain information (e.g. the information requested on an application form) then the Trustees may not be able to carry out their duties as Trustees and administer their pension and/or life

assurance benefits. When seeking information, the Trustees will try to set out clearly what information is needed and why that information is essential.

5. TRUSTEES' OBLIGATIONS AND RESPONSIBILITIES:

The Trustees are committed to fulfilling its obligations and responsibilities as a Data Controller as follows:

Maintaining a Record of Data Processing:

The Trustees maintain a record of its data processing activities in the manner prescribed by data protection legislation. This record is set out in Appendix 4 of this Policy.

Data Protection by Design and Default:

The Trustees will ensure that data protection collection practices and default settings are designed to collect the minimum data necessary for their purposes. The Trustees will complete a data protection impact assessment for all new types of processing activities where there is a potential of high risk to the rights and freedoms of members.

The Trustees will aim to reduce all data protection risks to the minimum possible. If the Trustees identify that some high risks remain, even after mitigations, then they will consult with the Data Protection Commission.

Transferring of Personal Data Outside of the EEA:

The Trustees would prefer if all personal data is processed within the European Economic Area. However, they recognise that this may not always be possible. Where data must be processed outside of the EEA, then the Trustees must ensure that the transfer is lawful and that there is an adequate level of data protection. This will be achieved by putting in place either the 2021 Standard Contractual Clauses (Commission Implementing Decision (EU) 2021/914); the post-Schrems II requirement to carry out and document a Transfer Impact Assessment and apply supplementary measures; the EU–US Data Privacy Framework adequacy (July 2023) for DPF-certified US importers, retaining SCCs as a fallback given ongoing monitoring of the framework's stability; and the renewed UK adequacy decision (December 2025).

Sharing Information:

Personal data may be shared with or obtained by a number of third-party providers to administer the pension and/or life assurance benefits and to deliver a service to Scheme members e.g. Employers, Risk Manager, Auditors and Legal Advisors. See Appendix 3.

Personal data may also be shared with regulatory, government and industry bodies to comply with the Trustees legal and regulatory obligations, including - the Revenue Commissioners, the Pensions Authority and the Financial Services & Pensions Ombudsman.

Implementing Appropriate Agreements with Third Party Providers:

Where the Trustees have appointed a third-party provider, such as Irish Life who administer the Pension Scheme, and Cornmarket who administer the Group Life Scheme, the Trustees will ensure that these third parties have put in place appropriate safeguards such as contractual commitments in accordance with applicable legal requirements to ensure that the personal data of the Scheme members is adequately protected.

Irish Life's Data Protection procedures are set out in the Administration Services Agreement signed on the 1st January, 2022 and a Service Level Agreement dated 23rd July, 2026.

Cornmarket's Data Protection procedures are set out in the Administration Agreement signed on the 2nd April, 2026.

Each agreement notes that the Trustees, Irish Life and Cornmarket are independent Data Controllers and that Irish Life and Cornmarket are not Data Processors for the Trustees.

Data Incidents:

Personal data incidents mean a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. The Trustees shall maintain a Data Incident Response Procedure to ensure that data incidents are handled and reported in a manner which complies with the GDPR requirements.

Incidents may also require reporting to An Garda Síochána, the Pensions Authority (competent authority for DORA incidents), Central Bank of Ireland, employers of members, other data controllers and insurers, depending on the nature of the incident.

Third party data controllers are responsible for having appropriate policies and procedures for dealing with data breaches relating to personal data. Third party data controllers are not obliged to inform the Trustees of a data breach. The Trustees will not be obliged to assist the data controller in relation to the breach. However, mutual co-operation is in the best interests of members, and the Trustees and Data Protection Team should will liaise with other data controllers as they deem necessary.

Irish Life and Cornmarket are separate data controllers from the Trustees and there is no direct provision in their agreements for them to inform the Trustees about data incidents. In practice, Irish Life do inform the Trustees of incidents.

Example:

Irish Life have agreed to inform the Pension Scheme Manager and the Professional Trustee of any breaches by email.

This notification is for information purposes, where an appointed third party is an independent Data Controller, they must follow their own procedures for managing possible Data Breaches.

Automated Decision Making:

The Trustees do not currently use automated decision making. The Trustees are aware of the specific requirements should automated decision-making become part of Scheme processes and monitor data processing activities to ensure that appropriate safeguards are implemented.

Cookies and Other Tracking Technologies:

The Trustees will ensure that cookies, beacons, tags and similar tracking technologies are implemented in accordance with the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 – SI 316 of 2011. Cookies should only be set that are strictly necessary for the operation of the website or for the provision of aggregated analytics.

Emails and other communications that include tracking technologies should operate so that the data protection wishes of the recipient are respected.

6. RIGHTS OF DATA SUBJECTS:

Data subjects have the following rights under data protection legislation, which the Trustees (or the Registered Administrator on behalf of the Trustees) must respond to without undue delay and within one month of receipt of the request. In the event that a request is complex or there are numerous requests at any given time, the Trustees may seek advice on whether there are grounds to extend the period of time for responding to such rights requests.

Description	When is this right applicable?
Right of access to Personal Data The Trustees acknowledge that a data subject has the right to request a copy of the personal data held by the Trustees	At all times (subject to certain exemptions).
Right to rectification of Personal Data The Trustees acknowledge that a data subject can request that any inaccurate or incomplete personal data is amended.	At all times (subject to certain exemptions). Members' personal data will be updated without undue delay on receipt of corrected details.
Right to erasure of Personal Data This right entitles Data Subjects to request that their personal data be deleted or removed from the Trustees' relevant systems and records. However, this right only applies in certain circumstances.	Infrequently. In the normal course this right will not apply until the end of the retention period given the Trustee's legitimate interest in maintaining complete Scheme records in accordance with the trust law and statutory obligations. Examples of when this right might apply to personal data the Trustees hold include (subject to certain exemptions): • When the Trustees no longer need the personal data for the purpose the Trustees collected it. • If the data subject withdraws consent to the Trustees' use of the relevant personal data and no other legal justification supports the Trustees' continued use of the personal data (as the Trustees do not process on the basis of data subject consent this is unlikely to apply). • If the data subject objects to the way the Trustees use the personal data and the Trustees have no overriding grounds to continue using it. • If the Trustees have used personal data

Description	When is this right applicable?
	unlawfully. • If the personal data needs to be erased for compliance with law.
Right to Data Portability A member has the right to obtain and reuse their personal data for their own purposes and can request the Trustees to transfer information held about them to a third party in paper form or electronically where this is technically feasible.	Infrequently. This right applies where the lawful basis of processing is consent or contract. As the Trustees do not generally rely on either lawful basis, then it is unlikely to apply. However, the Trustees will facilitate, where practicable, a transfer of data to a provider of another pension scheme, approved by the Revenue Commissioners.
Right to Restrict Processing of Personal Data A member has the right to request that the Trustees restrict processing their personal data in the following situations: • where the accuracy of the personal data is contested • where the processing is unlawful or • where the Trustees no longer need the personal data for the purposes of processing, but the member requires the data in relation to a legal claim.	Infrequently When a member exercises this right the Trustees may only store a member's personal data and will not further process the personal data unless the member consents to the processing 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.
Right to Object to Processing of Personal Data Data Subjects have the right to object to the processing of their data in certain circumstances. It is likely that the Trustees may have to continue to process the personal data, despite the data subject's objection, where it is necessary for the purposes of the Scheme.	Infrequently. The Trustees will consider if the request can be complied with and respond to the data subject.
Right to Withdraw Consent Where the Trustees have used consent as the lawful basis of processing then a data subject will have the right to withdraw their consent.	Infrequently. The Trustees do not normally process data on the basis of the member's consent. Where they do, then this right will be applicable.

Description	When is this right applicable?
Right to Complain The Trustees acknowledge that a member has the right to lodge a complaint with the Data Protection Commission.	At all times. The Trustees wish to find an amicable solution to all queries including data protection queries. But where this is not possible then the data subject will be informed about their right to complain and that our regulator is the Data Protection Commission. Data Protection Commission 6 Pembroke Row Dublin 2 D02 X963

Deceased Data Subjects – the GDPR refers only to living individuals and does not extend to those who are deceased. The Trustees will respond to requests for information about deceased Data Subjects, from appropriate parties, as if the deceased was alive. Appropriate parties mean their nominated representatives, executors or solicitors authorised by the estate of the deceased.

7. DATA PROTECTION TEAM:

The Trustees have decided that they are not required to appoint a Data Protection Officer. This is because the Scheme is not a public body, does not consist of processing operations requiring regular and systematic monitoring of Data Subjects on a large scale nor the processing of special categories of data or criminal convictions and offences. They have appointed a Data Protection Team who will be the point of contact for Data Subjects and with the Data Protection Commission.

Contact details should this be a numbered bullet point?

If a member has any questions or concerns about our use of their personal data or would like a copy of the personal data held, they can email the Pension Scheme Manager at pensionadmin@fedvol.ie

8. GOVERNANCE:

This Data Protection Policy is part of the Trustees Data Governance Framework. This in turn forms part of its risk management and overall governance. Specific policies related to this policy are:

- Data Protection Notice
- Data Incident Response Procedure
- Record of Processing Activity ("ROPA") (appendices 1 to 4 of this policy)

9. LEGAL STANDING:

This Policy is not, nor is it intended to be, a legal document and is not intended to have legal effect or to be legally binding on the Trustee Board, nor to override the Trust Deed & Rules of the Scheme.

The Trustees reserve the right at all times to depart from the terms of this Policy as it sees fit; for example, to accommodate a particular set of circumstances or a changing of views. Any departure will be exceptional, documented and approved by the Trustees.

10. POLICY REVIEW:

This Policy shall be reviewed by the Trustee Board at least every three years.

The findings of this review will be documented and any amendments to the Policy will be reflected in an updated Data Protection Policy.

Approval and Next Review Date of this Policy:

This document was approved and came into effect as follows:

Document Control	
Approved By:	Mr. James Skehan, Chairman and Professional Trustee, National Federation of Voluntary Service Providers' Pension & Life Assurance Scheme
Approved By:	Mr. John McHugo Vice Chairman, National Federation of Voluntary Service Providers' Pension & Life Assurance Scheme
Date approved:	30 th July, 2026
Next review date	July 2029
Previous versions	27 th February, 2026

**Signed:**

**James Skehan,
Chairman & Professional Trustee.**

Date: 30th July, 2026**Signed:**

**John McHugo,
Vice Chairman.**

Date: 30th July, 2026

APPENDIX 1

Types of Personal Data

Categories of Data Subject	Type of Personal Data
1. Members (including former members)	The types of personal data that the Trustees may process include, but is not limited to: • Personal details, for example: name, age, gender, date of birth, marital and family status, address, proof of identity (e.g. passport/driver's licence, utility bill, bank details and PPS number). • Contact details, for example: address, phone number and email address. • Details necessary to calculate and pay benefits (for example, employee ID, salary, date of hire, job title, employment grade, employment and pensionable service records relating to pensions and related employee benefits, salary, bonus, fluctuating emoluments and other remuneration arrangements, nature and details of current and historic pension arrangements, pension amounts, pension contributions, employee benefit details, insurance cover, tax details, retained benefits). • Details of beneficiaries and details about who members would like the Trustees to consider paying benefits to if a member dies in service e.g. Beneficiary or Expression of Wishes Form. • Professional advisors' details This information is collected directly from members, as well as from their employer and third parties such as members' previous employers or pension providers. Special Categories of Personal Data: data concerning ill-health (for purpose of assessing entitlement and benefits on retirement on grounds of ill-health), sexual orientation (in relation to marital status or relationship with beneficiaries)
2. Beneficiaries and Dependants	Name and contact details for persons named in a Beneficiary or Expression of Wishes Form. It may include marital status, bank details, date of birth, PPS number and any other data necessary to process benefit payments. Special Categories of Personal Data: Sexual orientation (in relation to marital status or relationship with scheme member).
3. Trustees	Name, mailing and residential addresses, email address, telephone number, date of birth, nationality, training records, conflicts of interest, fit and proper information, detail from passport or other identifying materials.

APPENDIX 2

Technical and Organisational Measures

The Trustees have approved technical and organisational measures. These are set out in Appendix 1 of the Information Security Policy.

APPENDIX 3

List of Data Controllers and Data Processors engaged by the Trustees

Data Controllers

- Irish Life Assurance plc
- Cornmarket (Group Life Broker)
- Aviva (Group Life Underwriter)
- Forvis Mazars
- Bank of Ireland
- Align Advisory Limited
- Grant Thornton
- A & L Goodbody (acting as a data controller)
- National Federation of Voluntary Service Providers
- The Employers who have adhered to the Scheme

Data processors

A & L Goodbody (to the extent it acts as data processor)

APPENDIX 4

Trustees' Record of Processing Activities - ROPA

Art. 30 GDPR Requirement	Record
Name, representative for GDPR and contact details of the Controller	National Federation of Voluntary Service Providers' Pension & Life Assurance Scheme, Oranmore Business Park, Oranmore, Galway. Telephone: 091 792316 or 087 9961104 Email: pensionadmin@fedvol.ie
The purposes of the processing	See Section 4 of this Data Protection Policy.
Description of the categories of Data Subjects and of the categories of personal data.	See Appendix 1 of this Data Protection Policy.
The categories of recipients to whom the personal data have been or will be disclosed.	See Section 5 and Appendix 3 of this Data Protection Policy.
Where applicable, transfers of personal data to a third country outside of the EEA.	See Section 5 of this Data Protection Policy.
Where possible, the envisaged time limits for erasure of the different categories of data.	See Section 4 of this Data Protection Policy.
Where possible, a general description of the technical and organisational security measures referred to in Article 32(1).	See Section 4 & Appendix 2 of this Data Protection Policy and Appendix 1 of the Information Security Policy