National Federation of Voluntary Service Providers
Pension & Life Assurance Scheme

Data Retention Policy

July 2026

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1. **Overview:**

This Data Retention Policy sets out how the Trustees of the National Federation of Voluntary Service Providers Pension & Life Assurance Scheme (the "Scheme") determine the periods for which personal data and Scheme records are retained, and how such data and records are securely disposed of at the end of those periods.

It gives effect to the storage limitation principle and the data retention commitments set out in the Data Protection Policy, and it provides the detailed retention requirements referred to in the Data Strategy Policy and the Data Governance Framework. It also supports the summary retention statement provided to members in the Scheme's Data Protection Notice (Privacy Notice).

The Trustees act as a data controller of personal data processed in respect of members, beneficiaries and Trustees under applicable data protection laws, including the General Data Protection Regulation ("GDPR") and the Data Protection Act, 2018. Retaining personal data only for as long as necessary, and disposing of it securely thereafter, is an important part of the Trustees' accountability obligations.

2. **Purpose:**

The purpose of this Policy is to ensure that the Trustees:

- Do not retain personal data for longer than is necessary for the purposes for which it is processed.
- Retain data and records for long enough to administer members' benefits and to meet their legal, regulatory and trust-law obligations.
- Apply consistent retention periods across the categories of data the Scheme processes.
- Securely dispose of data and records at the end of the applicable retention period, and can demonstrate that they have done so.

3. **Accountability:**

The Trustees have overall responsibility for this Policy and for compliance with data protection legislation. The Trustees have delegated responsibility for day-to-day data protection matters, including data retention and disposal, to the Data Protection Team. The Data Protection Team comprises the Pension Scheme Manager and the Professional Trustee. The Data Protection Team will ensure that the Scheme maintains adequate records of its retention and disposal activities and will report to the Trustees on these matters. The Data Protection Team may seek appropriate external assistance as required.

4. **Scope and Application:**

This Policy applies to:

- All personal data and Scheme records held by, or on behalf of the Trustees, in any format, whether held electronically or in hard copy, and wherever stored.
- Data held directly by the Trustees and data held on their behalf by service providers acting under the Trustees' control as data processors.

Where personal data relating to the Scheme is held by a separate, independent data controller (for example the Registered Administrator), the retention of that data is governed by that controller's own retention policy. This is addressed in the section "Data Held by the Registered Administrator and Other Parties" below.

5. **Relationship with Other Scheme Documents:**
   This Policy forms part of the Scheme's Data Governance Framework and should be read together with the other components of that Framework, in particular:
   - Data Protection Policy - which sets out the data protection principles (including storage limitation), the categories of personal data the Scheme processes, data subject rights, and the Record of Processing Activities (ROPA).
   - Data Strategy Policy - which addresses data lifecycle management and refers to the detailed retention requirements set out in this Policy.
   - Information Procedure - which describes the flows of member data and the parties involved in processing it.
   - Information Security Policy - which sets out the technical and organisational measures for storing and securely disposing of data.
   - Data Incident Response Procedure - which governs the handling of data breaches, including any arising during storage or disposal.
   - Outsourcing Policy - which governs the appointment and oversight of the service providers who hold Scheme data.
   - Data Protection Notice (Privacy Notice) - which informs members and beneficiaries, in summary form, of how long their information is kept.

   Where this Policy, and another Scheme documents, address the same matter, this Policy is the authoritative statement of the Scheme's retention periods and secure-disposal requirements. Any retention figures stated for illustration in other documents (for example in Appendix 1 of the Information Security Policy) should be read consistently with this Policy.

6. **Data Protection Principle - Storage Limitation:**
   The GDPR requires that personal data be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which it is processed. In line with this principle, and as stated in the Data Protection Policy, the Trustees will retain personal data and Scheme information only for as long as is necessary for the purpose for which it was collected, after which it will be securely destroyed.

7. **Legal and Regulatory Context:**
   In setting retention periods the Trustees take account of, among other things:
   - The long-term nature of occupational pension arrangements.
   - Their obligations under the Pensions Act, 1990 (as amended) and the requirements of the Pensions Authority.
   - The requirements of the Revenue Commissioners, including under the Taxes Consolidation Act, 1997.
   - The period under the Statute of Limitations during which a claim may be brought.
   - The Trust Deed & Rules of the Scheme.
   - The requirements of the GDPR and the Data Protection Act, 2018.

8. **General Retention Approach:**
   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 decades after a member has transferred their benefits or otherwise opted out of the Scheme. Accordingly, personal data relating to members' benefits will usually be retained by the Trustees until seven years after the winding up of the Scheme.

Where personal data is processed for purposes other than administering members' benefits, a shorter retention period may be used. This will, in normal circumstances, be for as long as the Trustees have a relationship with a data subject (or their beneficiaries and dependants) plus seven years. The seven-year period reflects the time under Revenue (Taxation) Law and the Statute of Limitations during which claimants could bring a claim. The Trustees may also retain records for longer where this is necessary to investigate or defend potential or actual legal claims.

9. **Retention Schedule:**

The following schedule sets out the Trustees' retention periods for the main categories of data and records. The periods are subject to any longer statutory minimum that applies and to the Trustees' right to retain records where needed to investigate or defend a legal claim.

Category of record	Examples	Retention period	Basis / cross-reference
Member benefit records (active, deferred and pensioner members)	Name, date of birth, PPSN, contact details, salary and service history, contributions, benefit calculations and payments	Seven years after the winding up of the Scheme	Data Protection Policy; long-term nature of benefits
Beneficiary and dependant records	Beneficiary details, Expression of Wishes / Beneficiary forms, dependant details	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.	Data Protection Policy Benefit must be paid to the member's estate and Trustees have no discretion.
Special category data	Data concerning ill-health (for ill-health early retirement) and data relating to relationship status of beneficiaries	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	Data Protection Policy (data minimisation)
Death-in-service and benefit claim records	Claim documentation, supporting evidence, payment records	Seven years after settlement or after winding up of the Scheme, whichever is later	Data Protection Policy
Records of	Refund and transfer-out	Seven years after the	Statute of Limitations;

Category of record	Examples	Retention period	Basis / cross-reference
members who left without a preserved benefit	records	end of the relationship with the member and their beneficiaries and dependants	Data Protection Policy
Identity and anti-money-laundering documentation	Proof of identity and address, AML checks	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)	AML legislation; Information Procedure
Financial and accounting records	Contribution records, Scheme accounts, audit 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, 6 years plus one)	Taxes / company law; Information Security Policy
Scheme governance records	Trustee minutes and decisions, policies and procedures, DPIAs, ROPA, trustee training, conflicts of interest register and log, fit and proper register.	Retained for the life of the Scheme and for seven years after its winding up	Accountability; Data Governance Framework
Investment records	Investment manager records and instructions	Duration of the arrangement plus seven years	Statute of Limitations
Service-provider contracts and data processing agreements	Administration, registered administration, investment and advisory agreements	Duration of the contract plus seven years	Operational Resilience Policy; Statute of Limitations
Data breach records	Breach register entries and related documentation	Retained for the period necessary to demonstrate compliance with Article 33(5) GDPR	Data Incident Response Procedure

Category of record	Examples	Retention period	Basis / cross-reference
Data subject rights request records	Access, rectification, erasure and objection requests and responses	Retained for a period sufficient to demonstrate compliance, then securely destroyed	Data Protection Policy

10. Retention Triggers:

The point at which a retention period begins depends on the category of record:

- For member benefit records, the retention period runs from the date the Scheme is wound up.
- For records processed for other purposes, the retention period runs from the date the Trustees' relationship with the data subject (and their beneficiaries and dependants) ends.
- For service-provider contracts, the retention period runs from the date the contract terminates.
- Where a legal claim is contemplated or in progress, the relevant retention clock is suspended until the matter is concluded.

In practice, the retention period (7 years for member and for scheme) will commence from the end of the calendar year in which the trigger occurs e.g. if the Scheme is wound up on 18 June 2026 then the 7 years commences on 31 December 2026, the 7 years runs until 31 December 2033 and the records should be destroyed in 2034.

In the event of the Scheme winding-up, then the Trustees must make appropriate arrangements for the holding of records and instructions for their destruction at the end of the appropriate periods.

11. Data Held by the Registered Administrator and Other Parties:

Much of the personal data relating to the Scheme is processed by Irish Life as Registered Administrator and Investment Manager, and by Cornmarket in respect of the group life arrangements. As set out in the Data Protection Policy, the Trustees, Irish Life and Cornmarket are independent data controllers. Irish Life and Cornmarket determine their own retention periods in accordance with their respective data protection policies and their agreements with the Trustees - the Administration Services Agreement dated 1st January, 2022 (Irish Life) and the Administration Agreement dated 2nd April, 2026 (Cornmarket) respectively.

Where a service provider acts as a data processor for the Trustees, the relevant written data processing agreement will require the secure deletion or return of personal data at the end of the retention period or on termination of the agreement, in line with this Policy. The appointment and oversight of all such providers is governed by the Outsourcing Policy.

12. Periodic Review and Data Cleansing:

The Data Protection Team will arrange for a periodic review of the personal data and records held by, or on behalf of the Trustees, to identify data that has reached the end of its retention period. Data identified in this way will be securely destroyed. The Pension Scheme Manager will maintain the data management maps referred to in the Data Strategy Policy to support this process.

13. Secure Disposal and Destruction:

Personal data and records that have reached the end of their retention period will be securely and permanently destroyed in a manner appropriate to the format and sensitivity of the data, in accordance with the Information Security Policy. In particular:

- Hard-copy records will be disposed of by cross-cut shredding or by certified confidential-waste destruction.
- Electronic records will be deleted using secure deletion methods, and digital storage devices will be securely wiped (for example by degaussing) or physically destroyed when they are no longer required.
- Where disposal is carried out by a service provider, the Trustees will obtain appropriate assurance, such as a certificate of destruction.

14. Right to Erasure and Other Data Subject Rights:

Data subjects have a right, in certain circumstances, to request the erasure of their personal data. As explained in the Data Protection Policy, this right will not normally apply before the end of the relevant retention period, given the Trustees' legitimate interest in maintaining complete Scheme records in accordance with trust law and their statutory obligations. Requests relating to erasure or retention will be handled by the Data Protection Team in accordance with the Data Protection Policy.

15. Records of Retention and Disposal:

To demonstrate accountability, the Data Protection Team will maintain records of the retention periods applied to the categories of data the Scheme processes (reflected in the Record of Processing Activities) and records of significant disposals of personal data, including the date of disposal, the categories of data destroyed and the method of destruction.

16. Data Breaches:

Any loss, unauthorised disclosure or unauthorised destruction of personal data, including any occurring during storage or disposal, will be treated as a data breach and managed in accordance with the Data Incident Response Policy.

17. Roles and Responsibilities:

Role	Responsibility
Trustees	Overall responsibility for this Policy and for compliance with data protection legislation.
Data Protection Team (Pension Scheme Manager and Professional Trustee)	Day-to-day operation of this Policy, periodic retention reviews, oversight of secure disposal, record-keeping, and reporting to the Trustees.
Pension Scheme Manager	Maintaining the data management maps and co-ordinating retention reviews and disposals.
Registered Administrator and other service providers	Applying retention and secure-disposal arrangements in accordance with their agreements with the Trustees.
Participating employers	Providing accurate data and disposing of any Scheme-related personal data they hold in line with this Policy, where applicable.

18. National Archives:

The Scheme does not currently fall under the National Archives Act, 1986.

19. 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.

20. Policy Review:

This Policy shall be reviewed by the Trustee Board at least every three years, and earlier if required by changes in legislation, regulatory guidance or the circumstances of the Scheme.

End

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 & 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:	30th July, 2026
Next review date	30th July, 2029
Previous versions	n/a

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

James Skehan,
Chairman & Professional Trustee.

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

John McHugo,
Vice Chairman.

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