Data Strategy Policy

July 2026

Oranmore Business Park, Oranmore, Galway, Ireland
+ 353 (0)91 792316 pensionadmin@fedvol.ie www.fedvol.ie
Pension Authority No: PB67866 Revenue Approval No: SF7346

1. **INTRODUCTION:**

   This document forms part of the Trustee's Data Governance Framework.

2. **PURPOSE OF POLICY:**

   The purpose of this policy (the Policy) is to set out the Trustees' Data Strategy.

   The Policy complies with The European Union (Occupational Pension Schemes) Regulations 2021, S.I. 128/2021 (implementing the terms of Directive (EU) 2016/2341 of the European Parliament and of the Council of 14 December 2016). It also complies with the Pension Authority's Code of Practice for trustees of occupational pension schemes and trust retirement annuity contracts. The requirements of paragraphs 13 to 16 of the Code of Practice are addressed in this Policy.

   In particular, this Policy is intended to achieve or contribute towards the following objectives:

   - Meet the Scheme's objectives, including paying the correct benefits to the correct beneficiary.
   - Underpin the governance and oversight of the Scheme including effective risk management and internal audit.
   - Provide such reporting as is required, including statutory reporting.
   - Ensure that accurate data records are maintained.
   - All data is transmitted securely and accurately, within prescribed timescales.
   - Set out the process agreed by the Participating Employers and the Trustees regarding the transmission and storage of data.
   - Ensure the data is processed in accordance with the Trustees' legal obligations in compliance with relevant laws and regulator standards.

3. **SCOPE AND APPLICABILITY:**

   This Policy applies to the following, insofar as they relate to the activities of the Scheme:

   - Member, former members and beneficiaries' personal data – this is the information the Trustees require, so that the Trustees may effectively administer the benefits of the members and their beneficiaries (Schedule 1).
   - Scheme information – this is the data which the Trustees hold on an ongoing basis to operate the Scheme e.g. Trust Deed & Rules and amendments, minutes, Trustee meeting papers, logs, frameworks, assessments, agreements, policies, reports, financial, banking and correspondence etc (Schedule 2).

   This Policy applies to the Scheme and personal data held on behalf of:

   - The Trustees.
   - All active members of the Scheme.
   - All employees included in the Scheme for risk benefits.
   - All former (deferred) members of the Scheme.
   - The beneficiaries of members of any type.
   - Participating employers.

It includes data shared with the Scheme's pension and life assurance administrators on behalf of the members and their beneficiaries. Both parties act as independent data controllers of the member's data.

4. DATA STRATEGY:

The Trustees' Data Strategy is to achieve the objectives set out in section 2 above by adhering to the principles set out below:

(a) Data, information, and reporting should be:

I. Adequate for the running and needs of the Scheme.
II. Limited to what the Trustee Board considers appropriate.
III. Personal data should only be collected where it is required for the purposes of the Scheme.
IV. Timely - information that is required should be sought and made available in a timely fashion.
V. Accurate and up to date – in respect of data, validation processes should be applied and data that changes over time should be renewed.
VI. Collected and maintained in a manner that supports the efficient governance and operation of the Scheme.
VII. Retained for a period identified as appropriate for the management of the Scheme, at which time it should be securely disposed of.

(b) Where appropriate, the data and information collected and maintained will have regard to the Trustee Board's assessment of the Scheme's size, nature, complexity and scale.

(c) Data and information will be held securely, and the collection, storage, use and disposal of data will comply with the General Data Protection Regulation (GDPR) requirements. To support this, the Trustees have an Information Security Policy.

5. DATA & INFORMATION MANAGEMENT:

Scheme Information:

The Trustees require information reporting in relation to the Scheme for governance purposes. This includes information on investment, funding, administration, Key Function Holder reporting and compliance reporting and is set out in the Trustees Governance Framework Policy. The timing and frequency of this reporting is scheduled in the Governance & Compliance Calendar. The Trustees shall periodically review the Scheme Information requirements in conjunction with its review of the Governance Framework Policy and having regard to the general principles set out above.

Governance Information:

The Trustees will maintain, in an accessible form, adequate records of reviews of policies, including minutes of meetings, documentation of decisions made, advice and expert reports, and all other information upon which decisions have been based.

Data Management Maps:

For the purpose of its strategic oversight of data management, the Trustees shall maintain Data Management Maps setting out at a high level, for both members and the Scheme, the:

- Nature and scope of data and information collected and required for the operation of the Scheme.
- Timing of their provision.
- Primary provider and recipient of the data and documents.
- Data quality validation mechanisms that apply, where relevant.

The Trustee Board's Data Management Maps are set out in the Schedules to this Policy:

- Schedule 1 – Data Management Map – Member Data
- Schedule 2 – Data Management Map – Scheme Information

The Data Management Maps will be maintained by the Pension Scheme Manager. The Trustees will review the Data Management Maps on an annual basis.

6. DATA GATHERING:

The Trustees have delegated the transmission of data to the Participating Employers who ensure that the data is verified as part of the annual renewal process. It remains the ultimate responsibility of the Trustees to ensure that all data held is correct and accurate and that it is transferred and managed in a compliant and secure manner. The Trustees Policy for Information Security is set out in the Trustee's Information Security Policy.

7. DATA PROTECTION:

Data Protection Legislation places enhanced accountability and transparency obligations on Pension Trustees when using members' personal data. The Trustees are committed to complying with the obligations and responsibilities that Data Protection Legislation brings. The Trustees policy for Data Protection is set out in the Trustee's Data Protection Policy and related procedures.

8. TIMELY RECEIPT AND PROCESSING OF DATA:

Pensions legislation contains clear timelines in relation to the transmission of member data and member disclosure requirements. The Trustees are responsible to ensure that all data is submitted in a timely manner to satisfy these requirements. The timelines for various data requirements are included in the Service Level Agreement signed with Irish Life dated 23rd July, 2026. The Trustees have approved an Information Procedure which supports this processing.

9. DEATH IN SERVICE AND ILL HEALTH RETIREMENT CLAIMS:

The Trustees oversee the management of death in service claims and will ensure that all necessary data and information is processed in a sensitive, efficient and secure manner.

Where a member seeks to retire early due to ill health the necessary supporting documentation will be obtained from the individual, their employer and their medical consultant. When approved, the claim will be processed by Irish Life. The Trustees have approved an Information Procedure which supports this processing.

10. DATA LIFECYCLE MANAGEMENT:

The Trustees will retain personal data and Scheme information for as long as is necessary for the purpose for which it was collected. At the end of this time period, data and information must be securely destroyed. The Trustees policy on data retention and deletion is set out in the Data Protection Policy and detailed in the Data Retention Policy.

11. REPORTING AND MONITORING:

The Information Procedure also sets out the Trustee Board's requirement for reporting and monitoring of data. Irish Life, as the appointed Registered Administrator, provide a quarterly Administration Report to the Trustees. They also provide an update on the Administration of the Scheme at the regular Trustee meetings where they discuss the quality and timeliness of the data received from the participating employers. Any concerns in relation to the data held will be raised at those meetings.

12. ROLES AND RESPONSIBILITIES:

The Trustee Board holds ultimate responsibility for the Scheme's data. The Trustees are supported by key roles such as the Data Protection Team (Pension Scheme Manager and the Professional Trustee) acting as the primary contact for data protection, the Participating Employers and the Scheme's administrator and other advisors with whom the Trustees share data as independent controllers. The specific responsibilities of each of the support roles will be set out in agreements with each party and reporting arrangements will be defined in the relevant policy or agreement.

13. 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.

14. POLICY REVIEW:

This Policy shall be reviewed by the Trustee Board at least annually.

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

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, Pension Scheme 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:	30th July, 2026
Next review date:	July 2027
Previous versions:	n/a

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

James Skehan,
Chairman & Professional Trustee.

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

John McHugo,
Vice Chairman.

a Oranmore Business Park, Oranmore, Galway, Ireland
t + 353 (0)91 792316 e pensionadmin@fedvol.ie w www.fedvol.ie
Pension Authority No: PB67866 Revenue Approval No: SF7346

Schedule 1 – Data Management Map – Member Data

Nature of data	**Scope** (indicated by examples)	Timing for provision/ refresh	Provided by	Primary recipient of data	Validation Mechanism
Core personal data that typically doesn't change	• Date of Birth (DOB) • Gender • Date of joining employment • Date joining Pension Scheme • Date of leaving employment • PPSN	On joining the Pension Scheme i.e., onboarding of employee	Employer	Registered Administrator (RA)	• Employer validates initially • RA validates as part of the renewal data exercise • Member validates on receipt of their annual Pension Benefit Statement (PBS) • Member validates via member portal • RA validates when benefits become payable
Core personal data that may change	• Marital status • Spouse / partner / dependent personal details • Member category • Address, telephone, email address • Expression of wishes and/or Will • Employer	On joining the Pension Scheme / At a later date if information changes	Employer, Trustees and Members	Registered Administrator (RA)	• Employer validates initially • RA validates as part of renewal data exercise • Member validates on receipt of their annual Pension Benefit Statement (PBS) • Member validates via member portal • RA validates when benefits become payable • RA Data cleanse exercise • Trustees validate in event of a death claim (Expression of Wishes form, RIP notice; Will etc.)
Personal data that changes regularly	• Pensionable Salaries • Member contributions	On joining the Pension Scheme At Scheme Renewal Date When Pensionable Salaries change	Employer	Registered Administrator (RA)	• Employer validates initially • RA validates as part of renewal data exercise • Member validates on receipt of their annual Pension Benefit Statement (PBS)

Schedule 1 – Data Management Map – Member Data

Nature of data	**Scope** (indicated by examples)	Timing for provision/ refresh	Provided by	Primary recipient of data	Validation Mechanism
Benefits	• Investment fund choices • Death in service • Ill-health • Retirement choices	On joining the Pension Scheme / At a later date if information changes	Member	Registered Administrator (RA)	• Member validates initially • Member validates when options received • Member validates via member portal • RA validates when benefits become payable • RA Data cleanse exercise • Trustees validate in event of a death claim (Expression of Wishes form, RIP notice; Will etc.)
Data for Revenue purposes	• Earnings history for benefit limit purposes, as and if required • Record of previous pension benefits	At point of claim if not already held	Employer/ Member	Registered Administrator (RA)	• RA validates as part of claim process • Records of previous scheme – member validated
Member documents	Certificates and AML documentation etc. (photocopy to be retained)	Prior to any benefit claim	Member	Registered Administrator / Trustees	• RA on sight of official documents • Trustees for death in service claims

Schedule 2 – Data Management Map – Scheme Information

Nature of data	Scope (indicated by examples)	Timing for provision/ refresh	Provided by	Primary recipient of data	Validation Mechanism
Scheme Governance	• Trustee agendas • Meeting minutes • Meeting papers • Correspondence • Frameworks, assessments, registers, logs, policies and procedures	Draft documents are reviewed by Trustees, amended and approved and finalised	Trustees; Service Providers; Pension Scheme Manager	Trustees	• Trustees
Scheme financial data	• Transaction details • Bank details • Bank statements • Annual accounts	May vary by item – see RAs SLA	Registered Administrator	Various: e.g. Trustees Auditor KFH	• RA do-check-review process • In the case of each TAR, Trustee review and External Auditor assurance
Scheme asset values	Fund Values, movements from previous period	Quarterly	Investment Manager	Trustees	• Trustees
Investment returns relative to benchmarks and targets	Scheme asset values comparisons v agreed benchmarks and peer comparison of PLS	Quarterly	Investment Manager	Trustees	• Risk Management KFH
Costs compared to budget	• Yearly Scheme Budget • Quarterly bank activity reports	Quarterly	Pension Scheme Manager	Trustees	• Quarterly bank activity reports reviewed by Trustees
Agreements & contracts	• Administrator and Insurance contracts and agreements • Engagement letters with Risk Manager, Internal Auditors and External Financial Auditors • Service providers e.g. banks, printers	On signing of agreements and contracts and renewal	Trustees; Service Providers	Trustees	• Trustees