



DTS Dedicated Trustee Services DAC Data Privacy Policy / Notice

DTS Dedicated Trustee Services DAC (“**DTS**”) will at all times endeavour to protect your personal data. The nature of the role of pension trustee dictates that certain personal data will need to be provided to us in order to properly, effectively and efficiently deal with pension and/or risk benefits. This policy / notice is provided to ensure that you are fully aware of how we use your personal data and what rights you have in relation to your personal data. We will use appropriate procedures and security features to process and protect your personal data.

1. DTS as Data Controller

DTS, as independent professional trustee to a pension and/or risk benefits scheme (“**Trustee**”), is a data controller of personal data under the General Data Protection Regulation (“**GDPR**”). This privacy policy / notice is provided for the benefit of:-

- past, present and future scheme members, beneficiaries, dependents and each of their respective spouses, civil partners, etc.;
- the personnel of any 3rd parties who engage with DTS such as, but without limitation, registered administrators, insurance companies, financial consultants (brokers), regulatory and/or state authorities, healthcare professionals, accountants, auditors, actuaries, lawyers, consultants, trustees, employers, etc.;
- the personnel of any 3rd party service providers of DTS;

(each a “**data subject**” or “**you**” or “**your**”).

This policy / notice relates only to personal data which DTS holds as data controller and you should also read the data privacy policies / notices of any and all other parties relevant to your relationship with DTS and the services which we provide.

2. What personal data DTS use and where it is obtained

DTS may collect and hold the following personal data:-

- name and contact information (such as email addresses, phone numbers);
- age, date of birth, gender, address, residency, citizenship, domicile, employment service details, salary and remuneration information, employee ID, PPS numbers;
- details of past / prospective employment;
- bank account information;
- copies of identification documentation (for example, passports, birth / marriage / death certificates, drivers’ licenses, utility bills, etc.);
- marital status and details of dependents and beneficiaries; and
- financial circumstances including other pension and/or risk benefits and other assets held.

We may also, on occasion, collect and hold information surrounding your health. Such information under GDPR is classified as sensitive personal data.

We may receive the personal data about you from third parties. These include registered administrators, your past, present and/or future employers, and financial consultants (brokers). On occasion we also receive information from other third parties, for example, from solicitors, GPs and

other medical professionals, auditors, accountants, etc. We also may receive information from regulatory and/or state authorities such as Revenue, the Courts Service and the Pensions Authority.

3. Possible consequence of not providing your personal data to DTS

Where we request personal data from you directly we may not be in a position to provide our services and /or deal with legal, compliance and regulatory requirements, if you refuse to provide it.

4. Legal Basis for use of Personal Data

➤ To comply with our legal and regulatory obligations

DTS uses your personal data as it is required for compliance with legal obligations to which DTS are subject. For example, we are obliged to process personal data as a result of pension legislation, Revenue rules, family law, trust law, probate law, and in complying with regulatory authorities such as the Pensions Authority and law enforcement. We use information surrounding your health only when it is absolutely necessary, proportionate and in connection with administering your benefits.

➤ For our legitimate interest

DTS has a legitimate interest in improving the high level of service we provide to employers and pension scheme members. This is in keeping with our fundamental principal of acting in the best interests of pension scheme members. To achieve this, DTS may use your personal data to:-

- develop and improve internal processes for our trustee duties;
- personalise and improve how we present information to you;
- for research purposes to better understand how pension scheme members interact and utilise their pension benefits;
- for internal training of staff;
- to conduct marketing activities;
- protect our business, manage networks and IT security; and
- engage state agencies to trace you (where necessary).

DTS will only process your personal data in such circumstances where it is absolutely necessary and will do so in a proportionate manner to ensure that such processing has no/minimal privacy impact.

5. Who DTS share your personal data with

In order to comply with our legal obligations and to ensure the administration of your pension and/or risk benefits we may share your personal data with:-

- your current, past or prospective employer;
- the registered administrator of your pension and/or risk benefits scheme;
- the financial consultants (brokers) appointed to your pension and/or risk benefits scheme;
- any third party who requires the information in connection with administering your pension and/or risk benefits, including external advisers (such as lawyers, consultants, actuaries, accountants), insurance companies, registered administrators and regulators; your authorised representative(s);
- regulatory and state authorities such as Revenue, the Courts Service, the Financial Services and Pensions Ombudsman and the Pensions Authority;
- your healthcare professionals; and
- service providers of DTS with whom we have entered into data protection agreements / arrangements.

6. How long we will keep your personal data

We will keep your personal data for only as long as we are required to do so by legislation, regulatory rules and in order to effectively deliver our services to you.

7. Transfers outside the European Economic Area (“EEA”)

Some of the third parties that we share your personal data with may be outside the EEA. DTS will take appropriate security measures to ensure that any such transfers are done securely and, if necessary, will use the Model Contract Clauses adopted by the European Commission, Data Privacy Shield or ensure that the jurisdiction in question has been considered by the European Commission as providing adequate levels of data protection and will formalise agreements where necessary with the relevant parties. If you require any further information on possible transfers outside of the EEA please contact us using the details below.

8. What are your rights?

You have the right, under certain circumstances, to make a request to:-

- access the personal data that we hold about you and receive copies;
- have inaccurate personal data corrected;
- restrict or object to the processing of some or all of the personal data we hold about you*;
- erase some or all of your personal data*;

If you wish to exercise any of these rights, please contact DTS at:-

Postal: DTS Dedicated Trustee Services DAC, PO Box 129, Killarney, Co. Kerry

E-Mail: dataprotection@dtstrustees.ie

Telephone: + 353 1 835 5578

*Please note that your request to restrict or object to processing, or erase of some or all of your personal data does not automatically lead to a requirement for the processing to stop, or for your personal data to be deleted.

You also have the right to complain to the Data Protection Commission(ers). You can contact the Data Protection Commission(ers) at:-

Postal Address: Data Protection Commissioner, Canal House, Station Road, Portllington, Co. Laois R32 AP23

E-Mail: info@dataprotection.ie

Telephone: +353 57 8684800
+353 (0)761 104 800

Facsimile: +353 57 868 4757

9. Updates

This Privacy Policy / Notice was last updated on 02 August, 2023. We will update this Privacy Policy / Notice from time to time and reserve the right to do so. Any updates will be made available via our website www.dtstrustees.ie.

DTS Dedicated Trustee Services DAC
2023.08.02