

Privacy Policy

Our privacy policy

We abide by the following eight data protection principles:

1. Obtain and process information fairly.
2. Keep it only for one or more specified, explicit and lawful purposes.
3. Use and disclose it only in ways compatible with these purposes.
4. Keep it safe and secure.
5. Keep it accurate, complete and up-to-date.
6. Ensure that it is adequate, relevant and not excessive.
7. Retain it for no longer than is necessary for the purpose or purposes obtained.
8. Give a copy of his/her personal data to than individual, on request.

Why we hold data

We require data to carry out our role advising public servants or providing services to public sector employees.

This responsibility requires us to hold person-level and scheme-level data.

Individual-level data may be given to us by the individual, their employer or other party connected to the provision of services to the scheme.

Data held by us may be used by us and/or given to one or more of the above parties for the purpose of ensuring that benefits are understood by us prior to advising you and are administered in accordance with the scheme.

Data held by us or information known to us may be passed to Government departments, agencies or any other arm of the State if we are required to do so by law.

Concerns or complaints?

Please contact John O'Connell as follows:

Email john@pensionteam.ie

Phone 014853887

Key points

1. If you are a member of a pension scheme where we provide services, either solely or jointly, we may directly hold data relating to you but we will also work with other parties who will hold your data.
2. We are generally data processors as we are holding your data to undertake duties determined by other parties.
3. We have a legitimate need for your data: your data is necessary in order for the pension scheme of which you are a member to administer benefits correctly. In such cases of legitimate need, you do not have the right for your data to be deleted.
4. We treat the security of your data as a priority and have engaged with IT experts to ensure that data is held securely.
5. We hold your data solely for the purposes of administration of the pension scheme of which you are a member and we will not use it for any other purpose.
6. Data principles:
 - a. Why are we holding the data? ... administration of pension schemes
 - b. How did we obtain it? ... transparently from employers and members
 - c. How long will we retain it? ... indefinite duration
 - d. Do we ever share your data with third parties and on what basis? ... yes – employer, scheme advisor, registered administrator. Those parties must also use the data for its original purpose.
7. You have the right to transparency. On request, we will advise you of the data that we are holding.
8. In the event of any data breach, we are required to bring this to the attention of the Office of the Data Protection Commissioner. Certain breaches of a serious nature would also be reported directly to you.
9. John O'Connell, Director is our Data Protection Officer

Our priorities

The GDPR (General Data Protection Regulation) Directive and the Data Protection Act 2018 changed the legislative basis for data processing in Ireland with effect from 25th May 2018.

We will work with relevant third parties where necessary:

A. To establish the minimum data required.

B. We will require that other parties – advisors, administrators, employers – use your data only for its original purpose. Agreements will be strengthened where necessary.

C. Duration of retention of data: We need to retain your data for a lengthy or indefinite period given the possibility that queries could emerge many years after you leave or retire from your pension scheme. We will review duration to determine whether this could reasonably be shortened.

Personal Privacy Rights

You have various rights under GDPR:

- access to your data
- to have inaccuracies corrected
- to object to direct marketing
- data portability

The following do not apply as we hold data on the basis of legitimate need:

- (normally) to have information erased
- (normally) to restrict the processing of information, including automated decision making

Reporting data breaches

We are required to have procedures in place which can detect, report and investigate any data breaches. Data breaches must be reported to the Data Protection Commission, typically within 72 hours, unless the data was anonymised or encrypted.

Breaches that are likely to bring harm to an individual – such as identity theft or breach of confidentiality – must also be reported to the individuals concerned.

Know more about your data rights

www.dataprotection.ie

www.gdprandyou.ie