

# Zurich Trustee Services Limited -Data Protection Notice

Zurich Trustee Services Limited is the trustee ('Trustee') of your pension scheme ('Scheme') and is a member of the Zurich Insurance Group (the 'Group'). Under the General Data Protection Regulation ('GDPR') the Trustee, as data controller, is required to notify you of the following information regarding the collection, holding, use, disclosure and transfer (collectively known as 'processing') of personal information (or data) relating to you.

#### Personal information collected about you

In addition to any information supplied by you, personal information about you may be obtained from other sources, such as the Group and where applicable, any former pension scheme or employer of yours.

The information may include such things as dates of birth and earnings (in order to calculate benefits and contributions) and bank account details (in order to pay pensions). Other personal information may be held, such as a member's wishes with regard to the distribution of any lump sum death benefit. If health or other sensitive information is to be processed, you will be contacted separately.

#### Use of personal information

Under the GDPR the Trustee is permitted to process personal information to administer the Scheme to provide associated benefits and generally to fulfil its legal and regulatory obligations. It may also process personal information in connection with legal proceedings or disputes or where it has some other legitimate interest in doing so; e.g., members' personal information may help the Trustee and its advisers derive an appropriate default investment strategy or range of investment options.

# Disclosure of personal information

Personal information may be transferred to and processed by Zurich Life Assurance plc ('Zurich Life') in its capacity as: (i) insurer; (ii) administrator of the Scheme; and (iii) Registered Administrator, and by other third parties and contractors involved in the running of the Scheme for the purposes of the Scheme or the business of the Group as it relates to the Scheme. These include service providers who carry out administration functions, insurance intermediaries, actuaries, investment managers who carry out periodic reviews of the Scheme's investment options and strategies, the Scheme auditor (if relevant) and other professional advisors' who are retained to advise on the Scheme. Also, the Group's computer systems are used for Scheme purposes and so personal information will be stored on them. The Group and other third parties and contractors will be subject to confidentiality requirements under which they may only access and process personal information as described in this notice.

Personal information may also be transferred to others where they have a legitimate interest in processing it or the Trustee is required by law to provide the information, including:

- Group companies (e.g. to provide administration, investment or actuarial support);
- any buyer or prospective buyer of the Trustee or another Group company involved in the running of the Scheme, including Zurich Life;
- other pension schemes and insurance companies to whom transfer payments may be made or benefits secured;
  and
- Revenue, the Pensions Authority and other statutory bodies.

# Retention of personal information

In the main the personal information obtained will be retained for 7 years after the wind up of the Scheme as benefit claims and gueries may be made at any time, but any details which the Trustee considers need no longer be retained will be erased.

## Transfers of personal information outside Ireland

The personal information that is collected may be transferred to, and stored in, Switzerland, which is outside the European Economic Area ('EEA') and for which there is an adequacy decision relating to the safeguards for personal data from the European Commission.

The personal information may also be transferred to, and stored in India, which is outside the EEA and for which there is no adequacy decision relating to the safeguards for personal data from the European Commission. Accordingly, appropriate safeguards have been put in place to protect personal information and you may obtain a copy of these safeguards by contacting the Trustee's Data Protection Officer at dataprotectionofficer@zurich.ie or by telephoning the Customer Services team on 01 799 2711.

## **Zurich Trustee Services Limited - Data Protection Notice (continued)**

#### Your rights

You have a number of rights in relation to the personal information which is held about you, including:

- · the right to see the personal information and to be provided with details regarding the processing of it;
- the right to have the personal information rectified if it is inaccurate or incomplete;
- the right to request that the personal information is erased or, in certain circumstances, to object to it being processed or to request that its processing is restricted. Please note however that any exercise of these rights will not be binding on the Trustee insofar as the Trustee is entitled to retain and process the information. Please also note that if you fail to provide accurate personal information or object to the processing of information this may result in a delay or an inability to process a claim for benefits under the Scheme; and
- the right to complain to the data protection commission, which may be contacted via its website at info@dataprotection.ie.

If you wish to avail of these rights, a request must be submitted in writing to the Trustee's Data Protection Officer. In order to protect your privacy, you may be asked to provide suitable proof of identification before the Trustee can process your request.

### Making contact

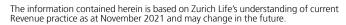
Zurich Trustee Services Limited's Data Protection Officer is contactable by phone, email, or post via:

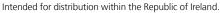
- Customer Services on 01 799 2711
- · dataprotectionofficer@zurich.ie
- Data Protection Officer, Zurich Trustee Services Limited, Zurich House, Frascati Road, Blackrock, FREEPOST, Co. Dublin

Please note that this Notice is not a stand-alone document and should be reviewed in conjunction with our Privacy Policy which is available at www.zurich.ie/privacy-policy.

Zurich Life Assurance plc

Zurich House, Frascati Road, Blackrock, Co. Dublin, Ireland. Telephone: 01 283 1301 Fax: 01 283 1578 Website: www.zurich.ie Zurich Life Assurance plc is regulated by the Central Bank of Ireland.





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