

# Trident Pension Trustees Ltd and your data

## Privacy notice

### Key points

1. If you are a member of a pension scheme where we act as trustees, either solely or jointly, we may directly hold data relating to you but we will also work with other parties including a registered administrator who will hold your data.
2. As trustees, we are data controllers. In some situations another party to the scheme will also act as data controllers.
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 we have taken measures in 2017 and 2018 to enhance data security.
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.

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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 Bill 2018 (once enacted) changes the legislative basis for data processing in Ireland with effect from 25<sup>th</sup> May 2018.

We are currently reviewing our policies with regard to the following matters and will work with relevant third parties where necessary:

- A. What is 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:

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- (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.

We are registered with the Office of the Data Protection Commissioner.

All breaches must be reported to the DPC, 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.

## Data Protection Officer

Our Data Protection Officer (DPO) is John O'Connell.

## Know more about your data rights

[www.dataprotection.ie](http://www.dataprotection.ie)

[www.gdprandyou.ie](http://www.gdprandyou.ie)

## Trident Pension Trustees Ltd

Trident Pension Trustees Ltd is authorised by the Department of Justice and Equality to carry on business as a trust or company service provider.

[www.tridenttrustees.ie](http://www.tridenttrustees.ie)