Trident Pension Trustees

Privacy Policy –
In our role as trustee to group life assurance schemes

This Privacy Policy explains how Trident Pension Trustees Ltd collects, uses, shares and protects personal data when acting as trustee to pension and group life assurance schemes.

This policy applies only to our trustee functions and does not cover data processed by employers, administrators or insurers in their own capacity.

Our privacy policy

We process personal data in accordance with GDPR, including the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation and security.

Why we hold data

When carrying out our role as trustee to group life assurance schemes, we are responsible for the governance of those schemes.

Our lawful basis for processing personal data is legitimate interest, arising from our duties as trustee.

We only process the minimum personal data necessary to carry out our trustee duties. This responsibility requires us to hold scheme-level data, and we generally do not hold individual-level data unless required for a claim, complaint or other trustee matter.

This data may be given to us by the employer, an insurance company providing risk benefits, the scheme advisor and/or the pension scheme member.

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 insured or benefits are administered in accordance with the trust deed and rules.

We may be required by law to provide certain information to Government departments or regulatory bodies.

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

Privacy Policy – General
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. Because we process data on the basis of legitimate need, certain GDPR rights, such as erasure, may not apply.

4. We take appropriate measures to ensure data is held securely. Access to personal data is restricted to those who need it for trustee duties.

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 and life assurance schemes.

    b. How did we obtain it? … transparently from employers and members.

    c. How long will we retain it? … We retain data for as long as necessary to administer the scheme and meet legal obligations.

    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.

Privacy Policy – General (continued)

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 review our data-processing arrangements periodically.

Where other parties act as data controllers, they are responsible for their own compliance with GDPR. We will work with relevant third parties where necessary:

A. To establish the minimum data required.

B. We expect all parties involved in scheme administration to use personal data only for its original purpose.

C. Duration of retention of data: We retain data for as long as necessary to administer the scheme and to respond to queries that may arise many years after a member leaves or retires.

Personal Privacy Rights

You have various rights under GDPR:

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

Some GDPR rights, such as erasure and restriction, may not apply where data is processed on the basis of legitimate need.

We will always consider any request made under GDPR and will respond in accordance with our legal obligation. Requests can be made using the contact details below.

Privacy Policy – General (continued)

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. Where data is encrypted, the risk to individuals is significantly reduced.

We have procedures in place to detect, assess and respond to potential data breaches.

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

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. See www.tridenttrustees.ie.

Concerns or complaints?

You may contact us with any questions about this policy. Please contact John O'Connell as follows: Email john@tridentconsulting.ie; Phone 014853887; Post 300A Cathedral Court, New Street, Dublin D08 A7K7.