

St. Patrick's Hospital 2005 Pension Scheme

Privacy Notice

The Data Controller for St. Patrick's Hospital 2005 Pension Scheme (the "Scheme") are the Trustees of the Scheme.

The Trustees ("Trustee", "we", "us", "our") are committed to protecting your privacy in line with legal requirements.

This Privacy Notice sets out the basis on which we will process any personal data we collect from you, or that you or other parties provide to us, in connection with your membership in the Scheme and which relates to you or to any individual connected with you.

Please read this Privacy Notice carefully so that you understand your rights in relation to your personal data, and how we will collect, use and process your personal data.

This Privacy Notice explains our policy in relation to:

- What information we collect or receive about you;
- How we use your information;
- Who we share your information with;
- Where and how long we will keep your data;
- How we keep your information safe;
- Your rights regarding the personal information you provide to us;
- Legal Bases for our processing;
- Who you can contact if you have questions or complaints about how we process your information.

Information we collect about you and how we use it

Information sources

We may collect personal data about you directly from you or indirectly through other parties such as your employer.

What types of personal information do we collect about you?

We may (if you provide to us) hold personal information in relation to you that includes but is not limited to:

- Personal identifying and contact details such as your name, email address, postal address, telephone or mobile number.
- Demographic data such as gender, age, date of birth, marital status, nationality.
- Employment details such as employee identification number, PRSI number, pensionable pay, length of service, job title, dependent/beneficiary information.
- Financial details such as income, salary, investment strategies, contribution histories, bank account details to process pension payments & benefits, insurance details.
- Special Categories of Data in relation to your physical and mental health only where processing is necessary for the provision of benefit purposes.

The Trustees are obliged under the Pensions Act, 1990, trust law and other relevant legislation to record your personal data, and if not provided by you, we may not be able to provide you or your dependants with the benefits of the Scheme.

How do we use your information?

We will use your personal information for the purposes of administering and managing the Scheme and for related purposes such as for disclosure to the employer or to other relevant parties, communicating with you, analytical and forecasting purposes, to comply with our legal obligations.

Legal Bases for our processing

We must have a legal basis to process your Personal Information. The following are our legal bases.

- To comply with our legal obligations
- For the performance of a contract as required by the scheme.
- The Irish Data Protection Act 2018 signed into law on 24th May 2018, gives further effect to the GDPR and permits the processing of health data for insurance and pension purposes.

Who we share your personal data with?

We share your information with selected recipients who are involved in the running of the Scheme such as the administrators of the scheme (Willis Towers Watson), Actuaries, Auditors & Insurers, Employer, Regulators. We may share your information with other third parties such as law enforcement agencies, public authorities or other organisations if legally permitted or required to do so.

Where do we store your personal data?

Your Personal Information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for Personal Information under European Union law. We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details provided under the "Contact and Comments" section below.

Keeping your information safe

We take very seriously our obligations to protect the personal information we hold against interference, misuse, loss and unauthorised access. Willis Towers Watson (Pension Administrator) and the Pension Trustees (Data Controller) maintains appropriate technical and organisational security measures to protect the security of your data against loss, misuse, unauthorized access, disclosure or alteration. These measures are aimed at ensuring the ongoing integrity and confidentiality of Personal Information. We evaluate these measures on a regular basis to ensure the security of the processing.

How long will we keep your personal data?

Pension benefits are paid over a long period and your right to benefits payable under the Scheme is based on information that may date back many years. We will retain your Personal Information for as long as is necessary for the operation of the scheme. When we no longer need your personal information for the operation of the scheme, we will then retain your Personal Information for a period of time that reasonably allows us to comply with our regulatory obligations and to commence or defend legal claims. We may retain aggregated or anonymised data (which is not treated as Personal Information under this privacy notice) for longer.

Your rights regarding the personal information you provide to us

If you would like to review, correct, update, suppress, object to, or restrict the processing of your Personal Information or request a copy of Personal Information about you, you may contact us by sending an email to

dataaccessrequest@willistowerswatson.com or sending your request by postal mail to the address provided in the “Contact & Comments” section below.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for record keeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the Office of the Data Protection Commissioner, at www.dataprotection.ie.

Privacy Notice Review

You may request a paper copy of this privacy notice from us using the contact details set out below. We may modify or update this privacy notice from time to time. This Privacy Notice will be reviewed regularly in light of any legislative or other relevant developments. We reserve the right to change this Privacy Notice from time to time at our sole discretion. If we make any changes, we will post those changes here and update the “Last Updated” date at the bottom of this Privacy Statement.

Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice of these changes so that you have the opportunity to exercise your rights (e.g. to object to the processing). We will notify you by means of a prominent notice on the Site or it will be otherwise communicated to you prior to the change becoming effective. We encourage you to regularly review this Privacy Notice to make sure you are aware of any changes and how your information may be used.

Contact Details

If you have any questions or comments regarding this privacy notice, please contact the following;

Willis Towers Watson
Willis Towers Watson House
Elm Park
Merrion Road
Dublin 4
D04 P231

Tel: + 353 661 6448.

Last Updated

This privacy notice was last updated on the 12/06/2018