

## Data Privacy Notice

Acumen & Trust Pension Trustees DAC is committed to respecting and protecting clients privacy and would like all of our clients to feel safe when providing us with personal details. We will always clearly identify ourselves in correspondence and on our website.

Our principal business is to provide trustee services on behalf of clients in relation to corporate pension and risk schemes. Acumen & Trust Pension Trustees DAC may need to collect and use personal information in order to provide such services.

This Privacy Notice will inform you of the information we gather and how it is used. Acumen & Trust Pension Trustees DAC maintains the same privacy practices with respect to data that is collected off-line and on-line and this notice also covers both those methods of data collection and use. Acumen & Trust Pension Trustees DAC complies with EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data.

Our Data Privacy Policy is available on request.

### What Information we gather

For ongoing provision of services, the type of personal information held on the records of Acumen & Trust Pension Trustees DAC would include the following:

- Personal Details - including date of birth, gender, and marital status;
- Contact Details - such as name, title, personal address, work and personal telephone numbers, and personal email;
- Income Details - this may include basic salary, overtime, bonuses and details of any other earnings / income;
- Employment History – we may need to hold your date(s) of joining and leaving, and prior remuneration history;
- Personal Identification Number- this may include your PPS number, or another unique identifier number provided by you or your employer;
- Bank Account Details – where required to facilitate payments into and out of accounts
- Pension Details – we may hold details of both current and prior pension scheme benefits;
- Medical Information – we may need to hold information in order to secure ill-health retirement benefits. If so, this information will be held by us for the required period of time as set out in our Data Retention Schedule;
- Identification – we may be required to hold ID (such as photo ID for Anti Money Laundering regulations), or copies of birth / marriage certificates (for example when a maturity / pension benefit is due for payment) ;
- Information about you provided by others e.g. your spouse/partner, professional advisors, etc.

Sometimes we may use your information even though you are not our customer. For example, you may be a beneficiary under a trust, a director of a client company, an employee of a client or a member of your employer's pension scheme.

Acumen & Trust Pension Trustees DAC  
4A Sandyford Business Centre, Burton Hall Road, Sandyford, D18 K856  
Phone 353-1-293 6500 Fax 353-1-295 2205  
[www.acumen.ie/trustee\\_services](http://www.acumen.ie/trustee_services)

**When we collect your information**

Information is gathered on individuals where benefits are to be paid or where a decision to be made is reliant on personal data.

**Use of the Information we gather**

We gather, use and share information only where there is a legal basis for doing so. This includes where you have given us information in order to provide you with a service, product or arrange a transaction for you.

Typically, the legal basis for using your data is to provide a service or arrange a transaction which you have requested. The legal basis will also include complying with our legal and regulatory obligations, e.g. under our Central Bank authorisations, interaction with the Data Protection Commission, Financial Services and Pensions Ombudsman, Revenue, Pensions Authority and when conducting Anti-Money Laundering checks.

Where you have agreed to the using of your data in a specific way, you may withdraw your consent at any time.

We may use your data if necessary to protect your “vital interests” in exceptional circumstances e.g. where we suspect a fraud may be in the course of perpetration.

Data may also be used for our legitimate interests (which you may object to) such as managing our business, providing service information, conducting marketing activities, training and quality assurance, and strategic planning.

In general, we will use the personal information to provide the services and to fulfil our contractual obligations to our clients. This will include the ongoing collection of relevant data to calculate benefits and contributions and to assess any service or product needs clients may have.

In addition we do reserve the right to use the data for the following

- To review and to provide enhanced services based on the analysis of the data;
- To be able to carry out background checks where relevant;
- To exercise, defend or protect our legal rights or the rights of our clients;
- To comply with information requests from government or regulatory bodies.

### **Who we share your information with**

When providing our services to you, we may share your information with:

- your authorised representatives;
- third parties with whom (i) we need to share your information to facilitate transactions or services you have requested, and (ii) you have agreed that we may share your information;
- product providers with which we propose to arrange business on your behalf;
- service providers who provide us with support services;
- statutory and regulatory bodies where we are legally obliged to do so;
- pension fund administrators, where applicable;
- other pension scheme trustees for your scheme or your employer in relation to the provision of pension benefits, where applicable.

### **How long we hold your data**

How long we hold your data for is subject to legislation and regulatory rules we must follow, set by authorities such as the Central Bank of Ireland, The Office of the Data Protection Commission, the Financial Services and Pensions Ombudsman. Our aim is to hold your data for no longer than is necessary and subject then to the timescales imposed by our legal obligations.

Data will not be held for longer than is necessary. General client details will be held while you are a customer, and where you cease to be a client, this will be for a period consistent with regulatory requirements for the relevant policy/benefit but in the minimum for up to seven years afterwards in order to facilitate any subsequent request for information we hold regarding your financial transactions during the time you were a client of Acumen & Trust Pension Trustees DAC and as evidence of trustee actions and decisions made by ourselves in carrying out our duties.

Our Data Retention Schedule is available upon request.

### **Implications of not providing your data**

If you do not provide certain information Acumen & Trust Pension Trustees DAC will not be able to:

- provide requested services to you;
- continue to provide and/or renew existing products or services;
- assess suitability;
- where you are a member or a prospective member of a scheme we will be unable to include you without all the relevant data; and
- ensure that the required risk benefits are insured if the medical evidence is not received.

### **Transfer of information outside the European Economic Area (EEA)**

It is our aim to retain any information which we hold within the EEA. However, given the nature of our business relationships with certain product providers, such providers may have legitimate business reasons to transfer information outside the EEA. The product providers with which we arrange business on your behalf are obliged to comply with the provisions of the GDPR in relation to the transfer of data within or outside the EEA.

### **Data Security**

Acumen & Trust Pension Trustees DAC's intent is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken appropriate steps to safeguard and secure information we collect online, including the use of encryption when collecting or transferring sensitive data.

### **How to Update and/or Amend the Personal Information you have provided**

You are entitled to know whether we hold information about you and, if we do (subject to certain limitations), to have access to that information and have it corrected if it is inaccurate or out of date. To exercise your Right of Access or to update your details under your Right of Rectification or Erasure (in certain circumstances) please email your request to the contact address below with proof of identity.

### **Contacting Us**

If you have any questions or comments about our privacy notice or data protection practices, please contact us.

Acumen & Trust Pension Trustees DAC may modify or update this privacy notice from time to time without prior notice. You can check the 'Last Updated' date below to see when the notice was last changed. We encourage you to check this notice often so that you can continue be aware of how we are protecting your personal information.

Email: [Solutions@acumen.ie](mailto:Solutions@acumen.ie)

Or via post and address your request to:

**The Compliance Officer,  
Acumen & Trust DAC,  
4A Sandyford Business Centre,  
Burton Hall Road,  
Sandyford,  
D18 K856.**

Last updated: 10<sup>th</sup> March 2021

Acumen & Trust Pension Trustees DAC  
4A Sandyford Business Centre, Burton Hall Road, Sandyford, D18 K856  
Phone 353-1-293 6500 Fax 353-1-295 2205  
[www.acumen.ie/trustee\\_services](http://www.acumen.ie/trustee_services)