



**TRUSTEE**  
PRINCIPLES

# Trustee Principles Limited Data Privacy Notice


2018





# Contents

- Who we are and what we do..... 1**
- What information do we collect? ..... 1**
- Legal bases and purposes for using your information ..... 3**
- Who do we share information with?..... 5**
- Where do we send your information? ..... 5**
- Cookies on our websites ..... 5**
- What if you don't provide personal information? ..... 6**
- Your rights ..... 6**
- How to update your information ..... 7**
- How long do we keep your information for? ..... 7**
- How do we store your information? ..... 8**
- Changing this Notice and notifying you ..... 8**
- Contact details..... 8**
- Complaints..... 8**



This Privacy Notice ("Notice") sets out the basis on which Trustee Principles Limited ("TPL", "we" or "us") of Elm Park, Merrion Road, Dublin 4, D04 P231, Ireland uses any personal data detailed below ("Personal Data") we collect from you or that you provide to us. The information provided by you will be held by us as a data controller.

## Who we are and what we do

TPL is a company fundamentally based on a knowledge and experience in pensions built up by our employees over the last 25 years. Our most important strength is our people and we believe our senior team of professionals providing truly independent trustee services is second to none in the Irish market. This is critical given the nature of trusteeship and the strategic importance for employers and trustee boards of the sound governance and management of pension schemes on behalf of their employees and beneficiaries.

For more information about who we are and what we do please go to [www.trusteeprinciples.ie](http://www.trusteeprinciples.ie).

TPL is a subsidiary of Willis Towers Watson PLC and operates as a stand-alone trustee business. Willis Towers Watson is a major global insurance broking and employee benefits firm.

Our trustee services meet the demand from employers that are looking to appoint pension scheme trustees to bring additional independence, expertise and experience to the trusteeship of their schemes. As pensions specialists, we have an in-depth knowledge of the complex range of legislative, financial, investment, employee engagement and operational issues that trustees have to consider.

TPL will use your information in accordance with this Notice.

## What information do we collect?

The personal information we collect about you will depend on the products and services you use. We have set out below examples of the types of information we may collect about you. We may receive this information from you, from third parties such as your employer, a life assurance company or a pension brokerage, and from publicly available information.

Where you provide information about other people (such as a spouse, civil partner, dependant and/or child) you are responsible for ensuring that they know we are using their personal information in accordance with this Notice and for ensuring that they consent to this use.

Where we ask for, or you voluntarily provide, special categories of personal information this

will only be used with your explicit consent and to provide you with the service you have requested or to help us to understand your specific circumstances and make appropriate adjustments to the service we offer. An example of a special category of personal information is information about your health.

<b>Information we collect</b>	<b>Examples</b>
Basic personal details	Name Date of birth Gender Marital/ civil status Contact details PPS number
Proof of identity	Passport/Driver's Licence Utility bill Birth certificate Marriage certificate/evidence of registration of civil partnership
Family details	Details of your: <ul style="list-style-type: none"> <li>• Spouse or Civil Partner</li> <li>• Partner</li> <li>• Next of kin</li> <li>• Dependants</li> <li>• Designated beneficiary or trustee</li> </ul>
Financial information	Salary Bank details
Professional advisers' details	Details of your: <ul style="list-style-type: none"> <li>• Financial advisers</li> <li>• Accountant</li> <li>• Solicitor</li> </ul>
Employment details	Length of service Salary Tax details Places and types of work carried out Details of retained benefits
Health	Physical Mental Family Medical history GP details Other medical practitioners details and medical insurance details
Information from devices you use	IP address (internet protocol address) Email address, telephone number CCTV, visitor logs, recorded calls
Demographic information	Address Eircode
Any other info you provide	e.g. Hobbies

# Legal bases and purposes for using your information

We will only collect, use and share your information where we have a valid reason to do so. We have four main reasons for using your information:

<b>NECESSARY FOR ENTERING INTO OR PERFORMANCE OF A CONTRACT</b>	
<b>Legal Basis</b>	It is necessary to process your Personal Data to enter into and perform our contract with you.
<b>Purposes</b>	We obtain, collect and process your Personal Data for the purposes of: <ul style="list-style-type: none"> <li>• assessing and processing your application;</li> <li>• responding to your enquiries;</li> <li>• managing and administering your pension or life assurance benefit;</li> <li>• dealing with claims; and</li> <li>• managing our relationship with you (for example tracing you when we've lost touch, to reunite you with the benefits of your pension).</li> </ul>
<b>IMPORTANT</b>	You are obliged to provide us with your Personal Data as it is necessary to enter into a contract with us and the consequences for not doing so are as follows: <ul style="list-style-type: none"> <li>• We will not be able to provide our services to you.</li> <li>• We will not be able to administer your pension and/or ill-health and/or death benefits.</li> </ul>

<b>COMPLIANCE WITH A LEGAL OBLIGATION</b>	
<b>Legal Basis</b>	It is necessary to process your Personal Data in order to comply with the legal obligations which apply to us as a trustee services provider.
<b>Purposes</b>	We obtain, collect and process your Personal Data in order to comply with the following legal obligations: <ul style="list-style-type: none"> <li>• meeting our anti-money laundering obligations;</li> <li>• doing anything we are required or permitted to do to meet our regulatory responsibilities under pensions and other applicable legislation;</li> <li>• complying with obligations we have in relation to the prevention and detection of crime (including fraud); and</li> <li>• complying with legal and good governance obligations.</li> </ul>
<b>IMPORTANT</b>	Often we will need your information in order to both perform a contract and to meet a legal obligation.

<b>CONSENT</b>	
<b>Legal Basis</b>	When you freely and voluntarily give us your Personal Data for the purposes below, you consent to our processing of your Personal Data.
<b>Purposes</b>	We obtain, collect and process your Personal Data and process it based on your explicit consent where we may need to provide certain trustee services to you.

---

---

**LEGITIMATE INTERESTS**

<b>Legal Basis</b>	We have a legitimate interest to process your Personal Data which is improving and developing the services we provide to you and in managing and evaluating our business. A third party's interests may be in the improvement of the insurance sector, e.g. a central fraud information base.
<b>Purposes</b>	We obtain, collect and process your Personal Data for: <ul style="list-style-type: none"><li>• maintaining service quality (e.g. we may monitor and/or record calls for authentication, security, quality and training purposes); and</li><li>• corporate reporting.</li></ul>
<b>IMPORTANT</b>	We will be open with you whenever we use your information for our or a third party's legitimate interests. Where processing is carried out on the basis of our or a third party's legitimate interests, such will no longer occur where such interests are overridden by your interests or fundamental rights or freedoms.

---

---

**DATA RELATING TO YOUR HEALTH FOR THE PURPOSES OF DEATH IN SERVICE AND/OR ILL-HEALTH BENEFITS**

<b>Legal Basis</b>	We will process special categories of your Personal Data relating to your health for the purposes of providing you with death and/or ill-health benefits under the occupational pension scheme.
<b>Purposes</b>	We will obtain, collect and process special categories of your Personal Data relating to your health on the basis that it is necessary and proportionate for us to do so to provide death and/or ill-health protection to you relating to your occupational pension scheme. We will only process data relating to your health subject to suitable and specific measures being taken to safeguard your fundamental rights and freedoms.

# Who do we share information with?

Who do we share information with?	Why
Service providers	We use third party service providers so we can administer your pension and/or life assurance benefits and deliver a service to you e.g. providers of pension administration services that manage your information and search services that help us trace you if we have lost touch.
Anyone you ask us to	If you ask us to share your information with anyone we will, e.g. trust administration, a professional adviser, etc. We may check with you to confirm that a person asking for information on your behalf has your authority to do so.
Regulatory, government and industry bodies	To comply with our legal and regulatory obligations, which may include best practice, we may have to share information with such bodies, in particular: <ul style="list-style-type: none"> <li>• The Revenue Commissioners</li> <li>• The Pensions Authority</li> <li>• Fraud Prevention Organisations</li> <li>• Financial Services and Pensions Ombudsman</li> <li>• Law enforcement bodies</li> </ul>
Courts and those involved in any legal process	We will comply if a court requires us to disclose your information or if it needs to be disclosed as part of a legal process.
Anyone in the future who may buy or merge with our business	If we merge with another company or if we are sold then we will need to share your information with the other party.

# Where do we send your information?

We operate primarily in the Republic of Ireland. However, sometimes the information that we collect from you may be viewed from, transferred to, or stored, outside the European Economic Area (EEA) in a country that is not regarded as ensuring an adequate level of protection for Personal Data under European Union law.

We ensure that we put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected when we allow your information to be processed outside the EEA. If you would like to find out more about the appropriate safeguards that we have in place to govern the transfer of your Personal Data you can contact us using the details below.

# Cookies on our websites

We hold cookies on our website and you will find our cookies policy at [www.trusteeprinciples.ie](http://www.trusteeprinciples.ie)

## What if you don't provide personal information?

We try not to ask you for personal information that we don't need. If you do not provide certain information then we may not be able to provide our service to you, e.g. if you don't provide the information requested on an application form we may not be able to provide a service to you. When we ask you for your information, we will try to set out clearly what information we really need and what information is essential for the provision of a service. If you don't want to provide certain information but are not sure of the impact that will have on the service please get in touch using the contact details at the end of this Notice.

## Your rights

We have set out below your rights but to keep things simple we have not included all the circumstances or conditions which apply to them. If you would like to exercise these rights please contact us using the contact details at the end of this Notice. If for any reason the right is limited or doesn't apply we will explain to you why this is the case.

<b>Right</b>	<b>Further Information</b>
<b>Right to Object</b>	<ul style="list-style-type: none"><li>You have the right to ask us to stop using your information in pursuit of our legitimate interests, and we will comply unless there is an important reason why we need to continue using it, which we will explain to you.</li></ul>
<b>Right to be Informed</b>	<ul style="list-style-type: none"><li>You have the right to clear, transparent and easily understandable information about how we use your information and your rights. We comply with this by way of this Notice.</li></ul>
<b>Right of Access</b>	<ul style="list-style-type: none"><li>You have the right to request a copy of the personal data held by us about you.</li><li>We will usually provide this free of charge. We will only charge you for making such an access request where we feel your request is unjustified or excessive.</li><li>For security reasons, we will take reasonable steps to confirm your identity before providing you with any personal data we may hold about you.</li></ul>
<b>Right to Rectification</b>	<ul style="list-style-type: none"><li>You have the right to request that we amend any inaccurate or incomplete personal data that we have about you.</li></ul>
<b>Right to Erasure</b>	<ul style="list-style-type: none"><li>You have the right to ask us to erase your personal data where:<ol style="list-style-type: none"><li>it is no longer necessary to perform our contract with you;</li><li>you object to the processing and we have no overriding legitimate grounds;</li><li>your personal data has been unlawfully processed; or</li><li>it must be erased to comply with a legal obligation.</li></ol></li><li>Sometimes we have to maintain records for legal reasons. If we cannot comply with your request then we will contact you and explain why. If you ask us to stop using your information we will still keep it, but we will not do anything with it.</li></ul>
<b>Right to Withdraw Consent</b>	<ul style="list-style-type: none"><li>If you have given consent for us to use your information then you have the right to withdraw your consent at any time.</li><li>However, if you do withdraw your consent we may not be able to continue to provide the service we offer to you.</li></ul>



<b>Right to Restriction of Processing</b>	<ul style="list-style-type: none"> <li>• You have the right to ask us to restrict processing your personal data in the following situations:               <ol style="list-style-type: none"> <li>(1) where you contest the accuracy of your personal data;</li> <li>(2) where the processing is unlawful and you do not want us to delete your personal data; or</li> <li>(3) where we no longer need your personal data for the purposes of processing but you require the data in relation to a legal claim.</li> </ol> </li> <li>• When you exercise this right we may only store your personal data.</li> <li>• We may not further process the data unless you consent or the processing is necessary in relation to a legal claim or to protect the rights of another person or legal person or for reasons of important public interest.</li> <li>• We will inform you before the processing restriction is lifted.</li> </ul>
<b>Right to Data Portability</b>	<ul style="list-style-type: none"> <li>• You have rights to obtain and reuse your personal data for your own purposes across different services. You can request that we transfer information we hold about you to you or a third party in electronic form, where this is technically feasible.</li> </ul>

If we have disclosed the personal information in question to another company or a company within our group (where appropriate), we will also let them know that you have asked us to stop using or retaining your information, and they will comply unless it is not possible to do so, or there are overriding legitimate interests. In either case we will explain the reasons to you.

## How to update your information

It is important that the information we hold about you is accurate and up to date. Please let us know if your information changes, or the information we hold about you is incorrect. You can ask us to update or correct your information free of charge using the contact details below.

If we have disclosed the personal information in question to another company or a company within our group (where appropriate), we will also endeavour to let them know about the changes.

## How long do we keep your information for?

We will not keep your information for longer than is necessary. Different information needs to be held for different periods of time, for a variety of reasons including legal obligations and enabling us to provide you with a good service. Where you participate in our pension schemes, the intention is to maintain your Personal Data until a legally binding discharge against potential future liability is received or until after the death of the last person with an entitlement under the scheme. If you require additional information on our data retention please contact us using the details below.

## How do we store your information?

We care about protecting your personal data, so we put in place appropriate technical and organisational measures and safeguards that are designed to prevent unauthorised access to, and misuse of, your personal data. We are committed to taking reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access.

## Changing this Notice and notifying you

To keep it up to date, or to comply with legal requirements, we may change this Notice from time to time. Any changes we make in the future will be effective immediately upon issuing a notification to you of the revised notice.

If at any time we decide to use your personal data in a manner significantly different from that stated in this Notice, or otherwise disclosed to you at the time it was collected, we will notify you by e-mail, and you will have a choice as to whether or not we use your information in the new manner.

## Contact details

If you have any questions or concerns about our use of your information or would like a copy of the information we hold about you, please write to:

Trustee Principles Limited  
Willis Towers Watson House  
Elm Park  
Merrion Road  
Dublin 4  
D04 P231  
Ireland

or you can send an email to: [info@trusteeprinciples.ie](mailto:info@trusteeprinciples.ie).

## Complaints

If you are unhappy with any aspect of the service we provide, please let us know. You have the right to complain to the Data Protection Commissioner whose contact details are:

Office of the Data Protection Commissioner.  
Canal House  
Station Road  
Portarlinton  
Co. Laois  
R32 AP23  
Ireland

Phone +353 (0761) 104 800 | LoCall 1890 25 22 31 | Fax +353 57 868 4757 | email [info@dataprotection.ie](mailto:info@dataprotection.ie)



# TRUSTEE PRINCIPLES

Trustee Principles Limited t/a Trustee Principles is a subsidiary of Willis Towers Watson PLC.  
Directors: James Campbell (British), Amanda James, Kirstie Flynn, Bruce Mullen. Company Secretary Gemma Roche.  
Registered in Ireland number 470586. Registered office: Willis Towers Watson House, Elm Park, Merion Road, Dublin 4, D04 P231.

46602/03/18