

# Trustees of CER Pension Scheme(s)

## Data Privacy Statement

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The Trustees of the CER Pension Scheme are committed to protecting your privacy. The Commission for Regulation of Utilities (CRU) is the name of your employer from 1 October 2017, the pension scheme is still known as the Commission for Energy Regulation (CER) Pension Scheme. This notice is being provided to you in line with our obligations under the General Data Protection Regulation (GDPR), which comes into effect on 25 May 2018. From that date, the GDPR, together with applicable Irish regulations, amends existing data protection law and places enhanced accountability and transparency obligations on organisations when using your personal information. It also gives you greater control over your personal information.

Please take time to read this notice carefully. If you have any questions about how we use your personal information, please contact a Trustee of the CER Pension Scheme at the contact details below.

As Trustees of your pension scheme, we need to collect and use personal information. This privacy notice sets out how we collect, use and protect your personal information and your rights in relation to your personal information.

This personal information is collected on behalf of us as your pension scheme Trustees (“data controller”) and processed by the scheme administrator (“data processor”). Personal information is any information, or a combination of pieces of information, that could reasonably allow you to be identified.

### Personal Information we use

We hold or will collect personal information about you from a variety of sources, including information directly from you, information provided by the CRU as your employer and information we get from other sources, such as the Revenue Commissioners.

### What personal information may we collect directly from you?

The categories of personal information that we may collect directly from you include:

- Personal details (e.g. your name, date of birth);
- Your bank account details and Personal Public Service Number (PPSN);
- Your contact details (e.g. your address, phone number and email address);
- Details about whom you would like us to consider paying benefits to if you die.

### What personal information may we collect from other sources (such as CRU)?

These are examples of categories of personal information we may collect from other sources:

- Personal details (e.g. your name, date of birth, marital status, age, employment details, dependents);
- Personal identification documentation and related information such as passport numbers and employee identification numbers;
- Your contact details (e.g. your address, phone number and email address);
- Information necessary to calculate and pay your contributions or benefits (e.g. your employment history and salary).

## How we may use your personal information and why?

The ways we may use your personal information include:

- Identifying you and your survivors and ensuring that your details are up to date;
- Communicating with you;
- Calculating and paying your benefits;
- Implementing Trustee decisions – such as whether to agree to early retirement or how to distribute benefits after your death;
- Calculating the actuarial liabilities of the scheme.

We must have a legal reason for use of your personal information. This is typically one of the following;

- To fulfil our legal obligations (including any contractual obligations), which includes making sure your benefits are paid correctly;
- For our legitimate interests to administer the pension scheme;
- To meet the employers legal obligations in managing the scheme;
- To establish, exercise or defend legal claims.

## Information Sharing

We may share personal information with:

- Our advisers (such as a scheme actuary, our auditors, and our legal adviser) and their sub-contractors to facilitate the administration of the scheme and your benefits;
- Medical professionals, such as GPs or medical examiners, where you have requested an ill health benefit;
- The Revenue Commissioners, the Pensions Authority and other Government organisations, including the Financial Services and Pensions Ombudsman;
- Insurance companies.

We may also provide some of your personal information to CRU to facilitate decision making relevant to their role as sponsoring employer of the pension scheme. We will only do so to the extent that we consider it necessary for these purposes.

## Security and Storage

We have in place measures to protect the security of your personal information and keep it confidential. We will review these measures regularly to ensure they remain appropriate.

When sharing your information with our administrators or other third party we will ensure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purposes we set out.

Pension benefits are paid over a long period of time and your right to benefits payable under the Scheme is based on information that may date back years. We may decide to delete some of the data held in relation to you after 6 years. However, your personal information may be held longer where; (i) it is required by law or a court order; (ii) it is needed to defend or pursue legal claims; (iii) we consider it necessary to ensure the Scheme pays the correct benefits; and (iv) to deal with any queries relating to your benefits as they may arise over time. We take into account our legal obligations and regulators' expectations.

## International Data Transfer

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 Law. Where your personal information is to be transferred outside Ireland (e.g. by the Scheme Administrator) we will make sure that there are appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on any safeguards in place, please contact us – as shown below.

## Your rights

You have rights regarding your personal information, including the right in certain circumstances to access, correct, delete or transfer your personal information or to restrict or use object to our use of it. We may need additional information from you to deal with any request. If you would like to exercise these rights, please contact us.

## Changes to this notice

We will update this Privacy Notice from time to time. Any changes will be communicated to you and made available on this page and, where appropriate, notified to you by e-mail or when you contact the Trustees of the CER Pension Scheme again. If you require a printed copy of this statement, please contact us.

## How to contact us

If you have any questions or concerns, please contact us at:

**Telephone:** +353 (0)1 4000800  
**E-mail:** pensions@cru.ie  
**Postal Address:** The Trustees of the CER Pension Scheme, c/o CRU,  
Grain House, The Exchange, Tallaght, Dublin 24, D24  
PXW0, Ireland

## You have the right to complain to the Data Protection Commission or another supervisory authority.

You can contact the Data Protection Commission at <https://www.dataprotection.ie/docs/Contact-us/b/11.html>

**Telephone:** +353 (0)761 104 800 or Lo Call Number 1890 252 231  
**Fax:** +353 57 868 4757  
**E-mail:** [info@dataprotection.ie](mailto:info@dataprotection.ie)  
**Postal Address:** Data Protection Commission, Canal House, Station Road,  
Portarlinton, Co. Laois R32 AP23 or 21 Fitzwilliam Square  
Dublin 2, D02 RD28

**The effective date of this statement is 22 May 2018.**