

PRIVACY NOTICE

- Aon Solutions Ireland Limited -

1. Introduction

This Privacy Notice describes how Aon Solutions Ireland Limited ("Aon") (and, where appointed, the Scheme Actuary) (together "we", "our", "us"), will use your personal information when providing pensions advisory, investment advisory and calculation services ("Services") to our clients (such as your employer or your pension scheme trustees).

We will be responsible for the personal information we use to provide these Services, including where information is retained beyond the duration of our agreements with clients. We are committed to being responsible custodians of your personal information and acting in accordance with our legal obligations and your rights under data protection law.

2. Collecting Your Information

We collect personal information about you in connection with your pension entitlements and to give advice to either the trustees and/or your employer and/or the sponsor of your scheme.

We also collect personal information about your spouse, partner or other immediate family member where you have named such individuals as beneficiaries to your pension. Where this additional information is provided to us, we will handle it in accordance with this Privacy Notice. However, as we will not be collecting the information from the beneficiary directly, you are responsible for informing your beneficiaries that we may process their information for these purposes, and providing them with a copy of this Privacy Notice.

The types of personal information we may collect include:

- a. **Basic personal data:** including name, address, postcode, contact details;
- b. **Unique identifiers:** such as Personal Public Service Number or pension scheme reference no.;
- c. **Demographic information:** date of birth, age, gender, marital status;
- d. **Employment information:** role, employment status (such as full/part time, contract), business unit, and employment history;
- e. **Financial information:** such as salary, income tax rate and rate band, Universal Social Charge rates, PAYE tax credits and reliefs, third party deductions, bonus payments, benefits and entitlement data, PAYE deductions, Universal Social Charge deductions and PRSI contribution details;
- f. **Banking details:** where necessary to pay your benefits;
- g. Call recordings for example we may record our telephone calls for specific purposes (such as training, customer service or dispute resolution);
- h. **Benefits programme participation and cover information:** benefit elections, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions and pension adjustment orders;
- i. **User profile** for example the username and the password that is used logging into the

- online pension portal as well as details on your use of the platform;
- j. **Special categories such as medical information:** in some cases it will be necessary for us to collect and process personal information relating to ill-health early retirement and ill-health reviews to determine the benefits paid to you. This kind of personal information is not routinely collected and processed by us and will only be done where it is necessary to do so in the circumstances.

We collect this information from sources including our clients and their service providers (such as payroll processors), third parties such as risk benefit insurers, your independent financial adviser and/or your Additional voluntary contributions provider (as applicable), and from pension scheme members directly, including where members provide us with information about nominated beneficiaries.

3. Processing Your Information

We may use the personal information we collect for the following purposes:

- a. **Plan Administration and Management:** to help our clients run their pensions arrangements, make disclosures to third parties where legally required to do so or as otherwise requested by you; and for other checks or administrative activities that may become necessary from time to time (like member tracing to ensure the data we use is complete);
- b. **Funding:** to place values on members' pension benefits entitlements as required by law;
- c. **Liability Management:** to undertake activities to help our clients manage their pension liabilities, such as bulk annuity quotations, scheme mergers, and member option exercises, as well as obtaining appropriate insurance coverage as may be required;
- d. **Scheme Actuary Duties:** to provide the valuations and calculations required of a Scheme Actuary by law;
- e. **Regulatory Compliance:** for meeting on-going regulatory, legal and compliance obligations including assisting with investigations or prevention of crime, providing you with updated versions of this Privacy Notice (where required);
- f. **Process and service improvement:** to maintain and improve processes used in running the scheme (for example, automated benefit calculation routines), products or services and uses of technology, including testing and upgrading of systems;
- g. **Pseudonymisation:** we will pseudonymise personal information (such that it can no longer be attributed to a specific data subject without the use of additional information) in order that it can be used with other data for data analysis, modelling, benchmarking and research purposes. We may share aggregated and pseudonymised data with third parties provided that we shall not publish externally or otherwise disclose any information which might reasonably identify you;
- h. **Benchmarking, Modelling & Analysis:** personal information will (in some instances in identifiable form, in others aggregated form) be processed for data analysis, modelling, benchmarking, and research purposes in order to improve understanding of life expectancy and other demographic aspects relevant for assessing pensions and insured liabilities. We may share limited identifiable data with third party agencies such as existence tracing providers to support these purposes. We will not otherwise publish externally or otherwise disclose any information which might reasonably identify you.
- i. **Legal Claims:** personal information will be processed for the purposes of the

- establishment, exercise or defence by us or third parties of legal claims
- j. **Provision of website:** to make the pension online platform available to you;

4. Legal Grounds for Processing

We rely on the following legal grounds to process your information:

- a. **Necessary to pursue our legitimate interests** to operate our business, provide the Services and improve our products and services generally. Where we rely on this legal basis to collect and use your personal information we will take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred on you under applicable data privacy law, especially for the processing activities set out in sections 3(a), (c), (f), (g), (h) and (j) of this Notice;
- b. **Pursuant to legal or regulatory obligations**, including requirements to make any disclosures to authorities, regulators or government bodies (including the Revenue Commissioners), especially for the processing activities set out in sections 3(a), (b), (e) and (l) of this Notice;
- c. **In limited circumstances, processed with your consent**, for example where we require you to provide sensitive information such as medical details that impact the provision of risk benefits and/or your retirement which cannot be processed without your consent, especially for the processing activities set out in sections 3 (a) of this Notice;

5. Accuracy of Your Information

We rely on the availability of accurate personal information in order to provide the services to our clients and operate our business. You should therefore notify us of any changes to the personal information managed when providing the service to our clients, particularly changes concerning contact details, bank account details, insurance policy details or any other information that may affect the proper management and administration of the insurance policy and/or the services provided.

6. Recipients of Your Information

We generally share your personal information with the following categories of recipients where necessary to offer, administer and manage the services provided to you:

- a. **Within Aon:** We may share your personal information with other Aon entities, brands, divisions, and subsidiaries to serve you, including for the activities listed above. We do not rent, sell or otherwise disclose personal information with unaffiliated third parties for their own marketing use. We do not share your personal information with third parties except in the following circumstances discussed below.
- b. **Your employer or other pension scheme trustees** and their service providers such as pension administrators and payroll providers;
- c. **Business Partners:** We disclose personal information to business partners who provide certain specialised services to us, or who co-operate with us on projects. These business partners operate as separate *controllers* and are responsible for their own compliance with data protection laws. You should refer to their privacy notices for more information about their practices. Examples may include:
 - Insurance and reinsurance companies -insurers, reinsurers, other insurance

intermediaries, insurance reference bureaus, medical service providers, fraud detection agencies, our advisers such as loss adjusters, lawyers and accountants and others involved in the claims handling process

- Banking and finance products - credit and fraud reporting agencies, debt collection agencies, insurers, reinsurers, and managed fund organisations for financial planning, investment products and trustee or custodial services in which you invest
- d. **Authorised Service Providers**, where we outsource our processing operations to suppliers that process personal information on our behalf. These providers are processors, who are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. These processing operations shall remain under our control and will be carried out in accordance with our security standards and strict instructions; Examples may include:
- IT service providers who manage our IT, websites and other back office systems and telecommunications networks;
 - Third party agencies, such as data tracing providers and other professional advisory agencies, where necessary to prevent and detect fraud in the pensions and insurance industry, or to assess and manage risk in relation to the services;
 - Legal advisers, loss adjusters, and claims investigators, where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature;
- e. **Other Authorised third parties:** third parties you have authorised us to share information with such as your financial advisor or nominated beneficiaries;
- f. **Legal Requirements and Business Transfers:** We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request. (ii) in response to law enforcement authority or other government official requests, (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iv) in connection with an investigation of suspected or actual illegal activity or (v) in the event that we are subject to a merger or acquisition to the new owner of the business, or if your pension scheme is transferred to another pension scheme, to the new trustees. Disclosure may also be required for company audits or to investigate a complaint or security threat;

7. Overseas transfers of personal information

- 7.1 We operate on a global and worldwide basis and we therefore reserve the right to transfer personal information about you to other countries including without limitation USA and India to be processed for the purposes outlined in the Notice. In particular, we may make such transfers to offer, administer and manage the services provided to you and improve the efficiency of our business operations. We shall endeavour to ensure that such transfers comply with all applicable data privacy laws and regulations and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.
- 7.2 Where we collect personal information about you in the the European Economic Area (the “EEA”) or United Kingdom (the “UK”) we may transfer the information to countries outside the EEA or UK for the processing purposes outlined in this Notice. This may include transfers to countries that the European Commission (the “EC”) and UK data protection

regulator consider to provide adequate data privacy safeguards and to some countries that are not subject to an adequacy decision. Aon has an intra-group data transfer agreement in place which regulates cross-border transfers of your personal information within the Aon Group and which incorporates the EU and UK standard contractual clauses approved by the EC and UK data protection regulator. Where we transfer personal information to third parties located in countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, such as the aforementioned data transfer agreements approved by the EC or UK data protection regulator, as appropriate. Where necessary, we may implement additional technical, organizational or contractual measures to ensure an adequate level of protection for your personal information. Where required, further information concerning these safeguards can be obtained by contacting us.

8. Retention of personal information

Aon retains appropriate records of your personal information to operate its business and comply with its legal and regulatory obligations. These records are retained for predefined retention periods that may extend beyond the period for which we provide the Services. In most cases we shall retain personal information for no more than twenty years beyond the period for which we provide the Services unless regulatory or legal obligations imposed on us require specific personal information to be retained for longer. We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

9. Information Security

We want you to feel confident that we are committed to keeping information secure. We have implemented appropriate technical and organisational security measures to protect the personal information we collect against unauthorised or unlawful processing and against accidental loss, damage or destruction.

10. Your rights and choices

10.1 You have the following rights under applicable data privacy laws in respect of any personal information we collect and use about you:

a.	The right to access and inspect your personal information or be provided with a permanent copy of the information being held about you.
b.	The right to request the correction of your personal information or in cases where the accuracy of information is disputed, to supplement the information to give notice that you dispute its accuracy.
c.	The right to request the erasure of your personal information, particularly where the continued use of the information is no longer necessary.
d.	The right to object to the use of your personal information, particularly where you feel there are no longer sufficient legitimate grounds for us to continue processing the information.
e.	The right to object to the use of your personal information for direct marketing purposes.

f.	The right to request the restriction of your personal information from further use, e.g. where the accuracy of the information is disputed and you request that the information not be used until its accuracy is confirmed.
g.	The right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse.
h.	The right to object to decisions involving the use of your personal information, which have been taken solely by automated means.
l	The right to withdraw consent at any time, whenever we have asked for your consent for processing your personal information without affecting the lawfulness of processing based on consent before its withdrawal.
i.	The right to complain to the relevant data protection regulator about our processing of your personal information.

10.2 It is important to note, however, that some of the rights described above in section 10.1 can only be exercised in certain circumstances. If we are unable to fulfil a request from you to exercise one of your rights under applicable data privacy laws we will write to you to explain the reason for refusal (e.g., for compliance with a legal obligation, for the establishment, exercise or defence of legal claims or legal exemptions). Where required, further information concerning these rights and their application can be obtained by contacting us.

11. Complaints

If you wish to make a complaint about the way we use your personal information you should raise this with us by contacting us in the first instance:

Data Protection Officer, 15 George's Quay, Dublin 2, D02 VR98 or online at privacy@aon.ie

However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the relevant data protection regulator.

Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland or online at <https://www.dataprotection.ie/en/contact/how-contact-us>.

12. Changes to this Notice

This Notice is not contractual, and Aon reserves the right to reasonably amend it from time to time to ensure it continues to accurately reflect the way that we collect and use personal information about you. Any updates or changes to this Notice will be made available to you. You should periodically review this Notice to ensure you understand how we collect and use your personal information.

This privacy notice was last updated: **October 2023**

13. Contact Information

If you have any questions about the content of this Notice or the rights conferred to you under the applicable data privacy laws you should contact the Data Protection Officer at the following address:

Data Protection Officer, 15 George's Quay, Dublin 2, D02 VR98. or online at privacy@aon.ie