Data Privacy Notice

Effective Last Updated - September 2024

Construction Executive Retirement Savings Trustees Designated Activity Company, which is the trustee of the Construction Executive Retirement Savings (the "Scheme") is committed to protecting your privacy. For the purposes of the General Data Protection Regulation (the "GDPR") and any related data protection legislation in Ireland, we are the data controller.

This Privacy Notice sets out the basis on which we will process any personal data we collect from you, or that you or third 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.

Information we collect about you and how we use it

Information you and your employer give us

We will collect your personal information i.e. information that identifies you for the purposes of the Scheme. This information may be provided to us directly by you, or through your employer who requests that you be admitted as a member of the Scheme. We also collect information through our website and our CCTV footage. We will take great care of the information provided and we will take steps to keep it secure.

What types of personal data do we collect about you?

We may hold the following personal information about you:

- Personal details such as your name, gender, age, date of birth, email address, postal address, telephone or mobile number and identifiers such as PPS number.
- Family details such as details about current marriage and partnerships and marital history, details of family and dependents.
- Employment details such as pensionable pay, length of service, employment and career history, job title, financial details such as income, salary, bank account details to process pension payments, benefits.
- Physical or mental health or medical conditions for the purposes of administering your Scheme benefits.
- Technical information and other information about your visits to our website and to our online pensions portal.

We will only request personal information from yourself or your employer that is necessary for the purposes of administration of the scheme.

How do we use your information?

We will use your personal information to administer the Scheme and any future agreements that we may have with you relating to the Scheme and to manage and develop our relationship with you.

We process your data to comply with our legal obligations under the Scheme's governing documents and pension and trust law requirements and otherwise for the purposes of our legitimate interests in promoting the proper and efficient administration of the Scheme in order to provide benefits for you and your dependants. From time to time, it may be necessary to process personal data relating to your health or other sensitive data for the purpose of establishing, exercising or defending a legal claim in respect of the Scheme (which includes assessing your eligibility or that of your beneficiaries for certain benefits).

Who we share your personal data with?

For the purposes of administering the Scheme we may provide relevant personal information to:

- the Administrator of the Scheme, CPAS
- your employer
- other companies within our Administrator's group
- This includes CERS, CIRT & Milestone Advisory. We will not share your data between companies within our administrators group without your explicit consent
- Cloud and other data storage providers
- IT service providers
- external printing and office support providers
- payment providers
- insurance companies
- legal and other professional advisers
- actuarial, administration and consultancy service providers
- the Pensions Authority and the Financial Services and Pensions Ombudsman
- Revenue Commissioners

We may also disclose personal information if required to do so by law and believe that such action is necessary to conform with the law.

If we provide your personal information to the above-mentioned third parties, we will take all reasonable precautions regarding the practices utilised by them in protecting your personal information. Those third parties will be required to: (i) keep your information safe and secure; and (ii) handle your information on our behalf and in accordance with our instructions.

Where do we store your personal data?

The information that we collect from you will be transferred to, and stored at/processed in the EEA. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Notice.

We will only transfer your information outside of the EEA where we have adequate measures in place to provide appropriate safeguards or use of contracts approved by the European Commission.

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 may decide to delete some of the data held in relation to you and operate to a retention period of life of Scheme plus 7 years. However, your personal information may be held for 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 is necessary to ensure the Scheme pays the correct benefits; and (iv) to deal with any queries relating to your benefits as they may arise after that time.

Your Rights

You have certain rights in relation to the personal information we hold about you, which we detail below. Some of these only apply in certain circumstances as set out below. Please note that we will require you to verify your identity before we respond to any of your requests. We must respond to a request by you to exercise those rights without undue delay and at least within one month (although this may be extended by a further two months in certain circumstances).

- **Right of Access** – you have the right to request a copy of the information that we hold about you.
- **Right of Erasure** – you have the right to ask for your personal data to be erased.
- **Right to be Informed** – you have the right to be informed when your personal data is collected.
- **Right of Rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.

- **Right to Restrict Processing** – you have the right to request the processing of your data is restricted or suppressed.
- **Right to Data Portability** – you have the right to obtain and reuse any of the personal data provided for your own purposes.
- **Right to Object** – you have the right to object to certain types of processing, such as direct marketing.

Please note that if you fail to provide accurate membership information or object to processing of your data it may result in a delay or an inability to process a claim for benefit under the Scheme.

Direct Marketing

Construction Executive Retirement Savings Trustees Designated Activity Company and other companies within our Administrator's group CPAS i.e. CIRT, CWPS, Milestone Advisory, CIF, construction related charities and trusted partner charities (e.g. the Marie Keating Foundation, the Irish Heart Foundation, Pieta House) may contact you about products and services they provide where you have consented to receiving same. If you do not wish us to use your data for this reason please telephone us on 01-4071430 or email us at **info@cpas.ie.** You will be given an opportunity to opt-out of receiving such messages and information on each occasion by post and email.

Technical information (including Cookies) that we collect about you

When you visit our website, we collect technical information about your computer, such as your internet protocol address (which is a number that can uniquely identify a specific computer on the internet), time zone setting, your login information, browser type and version, browser plug-in types and versions, operating systems and platforms.

We use Cookies to collect information about your browsing activities over time following your use of our services. They allow us to recognise and count the number of users and to see how users move around our website when they are using it. This helps us to improve the services we provide to you and the way our website works.

Complaints

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at **dataprotection@cers.ie** and we will endeavour to deal with your request as soon as possible. This does not interfere with your right to raise a complaint to the Office of the Data Protection Commissioner (DPC), details of which can be found on the DPC website **www.dataprotection.ie** or by contacting their office on 1800 437 737.

Changes to our Privacy Notice

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. Updates are effective from the date on which they are notified to members or posted on the website (**www.cers.ie**).

Contact

If you have any queries or concerns please contact:

Construction Executive Retirement Savings (CERS),
Linden House,
4 Clonskeagh Square,
Clonskeagh Road,
Dublin 14,
D14 FH90.

Tel: (01) 4071430
Email: dataprotection@cers.ie

CERS
BUILDING FOR **YOUR FUTURE**