

Acorn Master Trustee DAC

Your Privacy and Data Protection

We know your personal information is important to you and Acorn Master Trustee DAC is committed to protecting and respecting your privacy.

Please read this Privacy Statement to understand:

- How and why we use your personal data
- Your data privacy rights.

If you give us personal information about someone else e.g. your spouse/partner, please ensure you have their permission and make them aware of this Privacy Statement. For further information contact our Data Protection Officer at:

- In writing to Acorn Master Trustee DAC, St. Augustine Street, Galway, H91 PN80
- By telephone - 091 535700
- By email - dataprotection@acornlife.ie

Who we are

Acorn Master Trustee DAC, part of Acorn Life Group, is a 100% Irish owned company which carries out retirement benefit trustee activities and is Trustee of the Acorn Life Master Trust. To enable us to provide these services we process your personal data, such as financial and employment records. We need to process most of this personal data under the terms of a contract we have with you (your pension) or to meet legal obligations.

The personal data we process

We process data for the following reasons:

- Consultations and marketing e.g. contact information.
- Regulatory checks e.g. proof of identity and address to comply with Anti-Money Laundering law and screening customers against Financial Sanctions and Politically Exposed Persons (PEP) lists.
- Assessing insurance and financial needs to provide pension recommendations and quotes e.g. health questionnaire, your financial details, marital status and family members including children.
- Assessing insurance risks – underwriting e.g. medical assessment/evidence.
- Setting up and managing your policies e.g. communications about your policies and products/service history.
- Receiving and making payments e.g. bank and direct debit details.
- Assessing claims e.g. circumstances of an illness, medical assessment/evidence and where necessary fraud prevention.

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Legal basis for this processing

We process your data where:

- You have agreed and provided **consent** (you may withdraw your consent at any time) e.g. when we communicate with you for marketing purposes.
- It is necessary for the service of the contract (pension scheme) you have entered into.
- There are legal or regulatory reasons e.g. where regulators require us to maintain records about our dealings with you or conduct checks for anti-money laundering reasons.
- We have a legitimate interest to do so (and to which you may object). This means a business reason to use your data which takes into account your rights e.g. recording of phone calls for customer service reasons.
- Under the Irish Data Protection Act 2018 health data can be processed if it is necessary for insurance, life assurance or pension related reasons.

How we collect this data

- Directly from you e.g. phone conversations with our administrator, meetings with tied insurance intermediaries, letters, or emails.
- Via tied insurance intermediaries (financial advisors) who your employer or we have chosen to give service or advice on the scheme.
- From your employer, who may provide data to Acorn Life DAC to enable the administration of your benefits.
- From another pension provider, if you transfer benefits to the Acorn Life Master Trust from another pension arrangement or, information about any other pension entitlements may be required prior to payment of benefits from the Acorn Life Master Trust to check that benefit payments are within the limits allowed by the Revenue Commissioners.
- From others e.g. doctors/healthcare professionals, as well as media and social media sites, as part of the underwriting or claims process. Third parties who conduct searches on our behalf on publicly available information for Financial Sanctions/PEP screening purposes.

Our administrator, Acorn Life DAC, records and monitors calls for training and verification purposes and to meet regulatory requirements. They will let you know if a call is being recorded at the start of the call, so you can decide to continue or not.

What happens if you don't provide your personal data?

If you choose not to provide us with your personal data, it may mean we are not able to:

- administer your membership of the scheme.

We will tell you when we ask for information which is not a contractual requirement or is not needed to comply with our legal obligations.

How long we keep it for

We only keep your information for as long as there is a business reason, or where regulations say we must. Typically, this is for 6 years after our relationship with you or your beneficiaries ends.

Acorn Master Trustee DAC

Who we share it with

We share your information with the scheme's administrator, Acorn Life DAC, as well as the following types of recipients:

- Your employer.
- Other pension providers, if you transfer your pension to another pension provider we may need to provide them with some information about your entitlements in the Acorn Life Master Trust. Another pension provider may require information about your entitlements in the Acorn Life Master Trust in order to administer payment of benefits.
- Doctors and healthcare professionals e.g. where needed for underwriting and claims.
- Fraud prevention investigators - who assist us in some specific cases in identifying, investigating and preventing fraud.
- Legal and professional advisors.
- Statutory and regulatory bodies e.g. Central Bank of Ireland, the Pensions Authority, Irish Revenue and law enforcement authorities.
- Tied insurance intermediaries (financial advisors) who meet with you to provide advice and product recommendations.
- Your authorised representatives e.g. where you have asked us to share your data with them.

These data transfers are mainly within Ireland and the European Economic Area (EEA). When our administrators do transfer data outside the EEA, we take steps to ensure appropriate safeguards are in place in line with data protection laws e.g. contracts to protect your privacy.

Marketing

We contact you for marketing purposes where you have consented. If you also consent to it, we will share your contact details within Acorn Group. You may opt out of this marketing at any time by contacting dataprotection@acornlife.ie.

Your rights

- At any time, you may:
 - o Ask us for a copy of your personal data.
 - o Correct and update mistakes/incomplete personal data.
 - o Raise a complaint with the Data Protection Commission.
- In certain circumstances you may:
 - o Delete your personal data.
 - o Restrict use or object to us processing your data e.g. for marketing purposes.
 - o Take your personal data to another provider.
 - o Exercise a right not to be subject to solely automated decisions.
- Where you have consented to the use of your data, you have the right to withdraw this consent at any time.

Acorn Master Trustee DAC

Contacting us

If you have any further questions or you wish to exercise your rights, contact our Data Protection Officer using one of the following:

- In writing to Acorn Master Trustee DAC, St. Augustine Street, Galway, H91 PN80
- By telephone - 091 535700
- By email - dataprotection@acornlife.ie

Where a request relates to one of your rights, we ask that you provide the following:

- Name, address and any further contact details such as email or phone number that you would like us to use.
- A description of your request e.g. what types of personal data you would like a copy of.
- Policy number (where applicable). This will make it easier for us to identify you and your personal data.

Where relevant we may also ask for further proof of identity and address.

What happens if you have a data protection complaint?

We would like it if you contacted us first to see if we can resolve the issue. But, if you have an issue with how we are processing your personal data, you have the right to raise this with the Data Protection Commission at any time by contacting them using the following details:

<https://www.dataprotection.ie/contact>

Data Protection Commission

21 Fitzwilliam Square South

Dublin 2

D02 RD28

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