

FREEDOM TRUST SERVICES LIMITED

FAIR PROCESSING NOTICE

We know how important privacy is to you. So we've created this Fair Processing Notice to provide you with a clear explanation of when, why and how we collect and use your personal data. We've designed it to be as user friendly as possible, and have labelled sections to make it easy for you to navigate to the information that may be most relevant to you.

Please read this Notice with care, it applies to any personal data we have collected or will collect about you for the purposes set out in section 2. In this Data Protection Notice, references to “**you**” means the person whose personal information we collect, use and process. When we process your Personal Information, we act as controllers together with our client, your employer, and we cooperate with our client in meeting our compliance obligations under the law. For example, it is the client's responsibility to notify data subjects about the use of your Personal Information (as described in this privacy notice); to ensure the accuracy of the Personal Information they provide to us for processing; and to handle requests received from data subjects. It provides important information about how we use your personal data and explains your legal rights. This Notice does not override the rights you have available under data protection law. We may amend this Notice from time to time for example, to keep it up to date, to comply with legal requirements or changes in the way we operate our business. A version of this Notice will be published online and you can find it using the following link : <http://www.jlt.com/data-protection/ire/JLT-Employee-Benefits-Ireland>

1. Who is responsible for looking after your personal data?

Our client may provide us, Freedom Trust Services, with your Personal Information. Our client, your employer, is also a controller in respect of your Personal Information and you should consult with them in the first instance if you have any questions about the processing of Personal Information.

Freedom Trust Services Ltd is responsible for the information that we collect and process about you. You should be aware that your information may be held in databases which can be accessed by other JLT Group companies.

2. What do we use your personal data for?

We use your personal data to:

- verify your identity (including sanctions check);
- implement a pension scheme / registration of scheme with the Pensions Authority / Revenue Commissioners;
- administer a request to join the pension scheme including, but not limited to, in respect of a dependent following bereavement;
- calculate and process payment of benefits; to respond to and

Definitions

Notice – This Fair Processing Notice. Also referred to as a Privacy Notice.

We, us – The trustees, we are the Controller of the personal data we collect and process about you.

Your Personal Data - The personal data that we collect and process about you.

Special Category Data - Categories of information that require enhanced protection measures. This includes, for example, health related information.

Processing – Any set of actions which is performed on Personal Data such as collecting, recording, organising, structuring, storing, altering, retrieving, using, disclosing or destroying.

Controller – The person or body that determines the purposes and means of processing.

Processor – The person or body that processes Personal Data on our behalf.

Profiling - Using automated processes without human intervention (such as computer programmes) to analyse your personal data in order to evaluate your behaviour or to predict things about you, such as your likely risk profile.

CBI – The Central Bank of Ireland, a financial regulatory body. **DPC** - The Data Protection Commissioner who regulates the processing of personal data by all organisations in Ireland. See www.dataprotection.ie for more information. **PA** – The Pensions Authority, a regulatory body.

JLT Group – Jardine Lloyd Thompson Group plc and in the event that Jardine Lloyd Thompson Group plc is acquired by a purchasing firm, JLT Group shall include all companies within the purchasing firm

Service Providers - Third parties to whom we outsource certain functions of our business. We require all our service providers to respect the confidentiality and security of personal data.

manage change of address/name, transfers, contributions, divorce, death, bankruptcy etc.; to store death benefit nomination information on receipt; processing / implementation of Pension Adjustment Orders (PAO's)

- enable Freedom Trust Services Ltd to comply with legal or regulatory obligations, such as, but not limited to, tax or regulatory reporting, including disclosure to tax or regulatory agencies;
- record all incoming and outgoing calls for training, monitoring and security purpose, as well as to keep an accurate record of any instructions received from you in relation to your investments;
- carry out monitoring and to keep records, including administering and managing your investments and services relating to that, updating your records, and tracing your whereabouts to contact you about your investment;
- carry out tasks such as arranging for monies to be invested and disinvested accordingly.
- to provide reports to the Pensions Authority etc.
- to respond to and manage changes affecting the sponsoring employer such as adherence, removal, change of address/name, company status etc.;
- to provide Registered administrator services to Pension Schemes, including the preparation and provision of Annual Benefit Statements and Trustee Annual Reports and the maintenance of sufficient and accurate records of members and their entitlements to discharge the above functions
- administer serious ill health and ill health retirements;
- meet our legal and regulatory obligations.

We have set out the legal basis we use for collecting and using your personal data which can be found at <http://www.jlt.com/data-protection/ire/JLT-Employee-Benefits-Ireland>

3. What personal data do we collect?

We will only collect your personal data where it is relevant for the purposes set out in Section 2. The information we collect may include:

Categories of personal data	Examples of personal data we may collect
Personal attributes	Name; Age or date of birth; Personal Public Service number (PPS); Marital information (including divorce).
Personal directory	Address (including postcode); Email address; Telephone numbers; Passport; Utility bills; Birth certificate, or other forms of identity provided by you, or other forms of identity provided by you, , sometimes we may collect additional information about you from third parties. Specifically, we will obtain information about you from; government departments such as the Revenue Commissioners and the Department of Social Protection and publicly accessible sources (e.g. the electoral register ¹) if we have lost touch with you and we are trying to find you
Financial data	Salary / wage; Bank account information; Other financial information e.g. fund values, insured amounts. tax residency
Special categories of data	Health information.
Background checks	Outside Directorships & external business interests, Drinking habits;

Certain additional information may be collected where this is necessary for the trustees to fulfil their responsibilities under the terms of the trust and relevant regulation.

From time to time, you may need to provide us with someone else's personal data, e.g. your dependants, nominated beneficiaries, power of attorney etc. Wherever possible, you should take steps to inform them that you need to disclose their details to us, obtain their consent to do so and identify us as the party with whom you are sharing their information. Please provide them with a copy of this Notice.

We will obtain your explicit consent before collecting and/or using any Special Category Data, where your consent is required under data protection law. If you provide your explicit consent, you may withdraw that consent at any time. However, you should be aware that if you choose to withdraw your consent to collect or use Special Category data then we may be unable to continue to provide services to you. If you choose to withdraw your consent we will tell you about the possible consequences at that time.

4. Who do we collect your personal data from?

We will collect information from you, your employer, your appointed representatives, or third parties acting on behalf of your employer (for example a financial services provider over the course of our dealings with you. We may also obtain information from other sources such as public registers, other online sources, and other reputable organisations.

5. Who do we share your personal data with?

We may make data available to processors and /or third party service providers of Freedom Trust Services Ltd under conditions of strict confidentiality. Your personal data may also be disclosed where we have a legal obligation or duty to disclose it, for example to comply with anti-money laundering and counter-terrorism requirements. We work with other members of the JLT Group and Service Providers to help manage our business and deliver services to you. These parties may from time to time need to have access to your personal data

You should be aware that your information may be held on JLT databases which can be accessed by JLT Group companies. These parties may from time to time need to have access to your personal data. The Service Providers may include:

- Financial institutions with whom you have assets;
- Providers of pension transfer analysis calculations, suitability reports and portfolio valuations;
- Providers of actuarial services
- Businesses who help manage FTS's IT and back office systems;
- law enforcement agencies and governmental and regulatory bodies in Ireland and overseas, such as the Office of the Revenue Commissioners, the Department of Social Protection, any regulatory bodies with authority over Freedom Trust Services Ltd or its service providers, fraud prevention agencies, or financial services ombudsman; and
- Auditors and other professional services firms.

We may be under legal or regulatory obligations to share your personal data with public authorities, government bodies, courts, regulators (which may include the CBI, Pensions Authority, Revenue Commissioners, Data Protection Commissioner and law enforcement agencies in the E.U. and around the world. Also, if the JLT Group were to sell part of their businesses they may need to transfer your personal data to the purchaser of such businesses.

We will not share your personal data with third parties for marketing purposes.

6. International Transfers

From time to time FTS may need to share your personal data with members of the JLT Group or with other Service Providers who may be based outside of the European Economic Area (EEA). FTS always take steps to ensure that any international transfer of information is managed carefully and in accordance with data protection law to protect your rights and interests. These measures include:

- Transfers of your personal data to countries which are recognised as providing an adequate level of legal protection;
- Transfers within the JLT Group where they have entered into Standard Contractual Clauses or an intra-group agreement, both of which give specific contractual protections designed to ensure that your personal data receives an adequate and consistent level of protection wherever it is transferred within the JLT Group; and
- Transfers to Service Providers protected by prior due diligence and contractual commitments such as signing the Standard Contractual Clauses and, where available, further assurances such as certification schemes.

You have the right to ask us for more information about our safeguards. Please contact us if you would like further information or to request a copy where the safeguard is documented (which may be redacted to ensure confidentiality).

7. How do we keep your personal data secure?

Freedom Trust Services Ltd take data security seriously. To reflect this, it has put in place a clear chain of responsibility when it comes to security. In respect of the JLT Group, their Group Chief Information Security Officer (CISO) and CISO

office is responsible for helping all JLT entities protect personal data and manage security risks. The CISO office does this by developing, monitoring and reviewing their information security framework policies and standards.

8. How long do we keep your personal data?

We keep your Data for as long as it is necessary to do so to fulfil the purposes for which it was collected as described above and in accordance with our legal and regulatory obligations. The criteria we use to determine data retention periods for Data includes the following:

- i. retention in case of queries; we will retain it for a reasonable period after the relationship between us has ceased;
- ii. retention in case of claims; and
- iii. retention in accordance with legal and regulatory requirements

9. What are your rights?

You have a number of rights in relation to your personal data. You may request access to your data, correction of any mistakes in our files, erasure of records where no longer required and restriction on the processing of your data, You also have rights in respect of the processing of your data, data portability and information used in relation to any Automated Decision Making and Profiling or the basis for international transfers. You can find out more information about your rights by clicking on this link. www.freedomtrust.ie/yourdata.html

Where we rely on our legitimate interests to obtain and use your personal data then you have the right to object if you believe your fundamental rights and freedoms outweigh our legitimate interests.

Where processing is carried out based upon your consent, you have the right to withdraw that consent. You may also exercise a right to complain to your Supervisory Authority. Please contact us if you wish to exercise any of your rights.

10. Contact, further information, queries and complaints

Our Data Protection Officer is your primary point of contact for all matters arising from this Notice, including requests to exercise your rights set out in section 9.

If you have any query, complaint or concern about how we use your personal data, please contact us in the first instance and we will attempt to resolve the matter as soon as possible. You also have a right to lodge a complaint with the Data Protection Commissioner at any time.

You can contact our Data Protection Officer at **EB_DataProtectionOfficer@JLTGroup.com**.

APPENDIX 1: WHAT IS THE LEGAL BASIS ON WHICH WE PROCESS YOUR PERSONAL DATA?

Activity	The legal basis for the processing of your personal data
To undergo the tender process under a Letter of Authority and / or Letter of Understanding and where successful - implement the pension scheme onto our platforms to enable provision of services to the scheme and implement service level agreements and undergo registration and approval process.	Performance of a contract
To deal with investment matters, including setting investment strategies and member fund choice in accordance with regulatory guidelines	Performance of a contract
To calculate and process payment of benefits; to respond to and manage change of address/name, transfers, contributions, divorce, death, bankruptcy etc.; to store death benefit nomination information on receipt.	Performance of a contract
To provide reports to Regulators e.g. The Pensions Authority, Revenue etc.. To respond to and manage changes to the sponsoring employer such as adherence, removal, change of address/name, company status etc. To carry out ad hoc projects on behalf of the sponsoring employer.	Performance of a contract
To verify members' identity (including sanctions check).	Performance of a contract
To provide communication as outlined under disclosure requirement regulations	Performance of a contract
To ensure in so far as reasonable that contributions payable by the employer and the members of the scheme, where appropriate, are received and are invested in accordance with statutory deadlines and where necessary undergo compulsory reporting to the regulatory body.	Performance of a contract
To review funding position of the schemes and determine contribution rates and regulatory reporting.	Performance of a contract
To support our controls and management information	Legitimate interest
To improve our processes and use of technology	Legitimate interest
To comply with legal and regulatory obligations.	Legal obligation

FREEDOM TRUST SERVICES LTD

YOUR RIGHTS

Your right	What this means
Access	<p>You can ask us to:</p> <ul style="list-style-type: none"> confirm whether we are processing your personal data; give you a copy of that data; provide you with other information about your personal data to the extent that information has not been provided to you in this Notice, such as what data we hold about you, what we use it for, who we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any Automated Decision Making or Profiling.
Rectification	<p>You can ask us to rectify inaccurate personal data. We may seek to verify the data before rectifying it.</p>
Erasure	<p>You can ask us to erase your personal data, but only where:</p> <ul style="list-style-type: none"> it is no longer needed for the purposes for which it was collected; or you have withdrawn your consent (where the data processing was based on consent); or following a successful right to object (see 'Objection' below); or it has been processed unlawfully; or to comply with a legal obligation to which we are subject. <p>We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims. There are certain other circumstances in which we are not required to comply with your erasure request, although these two are the most likely circumstances where we would deny that request.</p>
Restriction	<p>You can ask us to restrict (i.e. keep but not use) your personal data, but only where:</p> <ul style="list-style-type: none"> you contest the accuracy of your personal data (see Rectification), to allow us to verify its accuracy; or the processing is unlawful, but you do not want it erased; or it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or you have exercised the right to object, and verification of overriding grounds is pending. <p>We can continue to use your personal data following a request for restriction, where:</p> <ul style="list-style-type: none"> we have your consent (for example to process a claim); or to establish, exercise or defend legal claims; or to meet legislative or regulatory requirements or to protect the rights of another natural or legal person.
Portability	<p>You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another Controller, but in each case only where the processing is based on your consent or the performance of a contract with you; and the processing is carried out by automated means.</p>

Objection	You can object to any processing of your personal data which has our 'legitimate interests' as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests. Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.
International Transfers	You can ask to obtain a copy of, or reference to, the safeguards under which your personal data is transferred outside of the European Economic Area. We may redact data transfer agreements or related documents (i.e. obscure certain information contained within these documents) for reasons of commercial sensitivity.
Supervisory Authority	You have a right to lodge a complaint with your local supervisory authority about our processing of your personal data. In the Ireland, the supervisory authority for data protection is the Data Protection Commissioner. We do ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.