

## **Citibank Employee Benefit Plan - Ireland (the “Scheme”)**

### **PRIVACY STATEMENT**

Citibank Employee Benefit Plan Trustees Ireland Designated Activity Company (the “Trustees” or “we”) require Personal Data relating to you to administer the Scheme and pay the benefits. In legal terms, the Trustees are data controllers and, as such, we are required by data protection law, including the General Data Protection Regulation (EU 2016/679) (“GDPR”) to provide you with information in relation to the collection, holding, use, disclosure and transfer (known as “processing”) of personal information (or “Personal Data”) relating to you. This Privacy Statement describes how and why we collect Personal Data and what we do with it.

Personal Data means any information which the Trustees have or obtain, such as your name, address, email address, date of birth etc, from which you can be directly or indirectly personally identified, and may include information such as salary, bank account numbers, tax identifiers and residency information, and online identifiers. Some of this Personal Data may be sensitive Personal Data, such as data relating to your health or sexual orientation.

**We will not be able to provide you with the full benefit of Scheme membership if you do not provide us with your Personal Data.**

#### **Where we get Personal Data from**

We collect Personal Data directly from you. We also receive Personal Data about you from third parties, including the data which your employer provides to us. If you transfer your funds into the Scheme from another scheme or pension product, we may sometimes collect additional Personal Data about you from operators or administrators of those schemes or pension products.

Where you provide us with Personal Data from which other people can be identified, such as your dependants, you must do so in accordance with applicable laws and should tell them that you have provided their personal data to us. We may inform those individuals that you have provided their details to us, and provide them with a copy of this privacy statement.

#### **Use of Personal Data and Basis of Processing**

We gather and process your Personal Data for a variety of reasons and rely on a number of different legal bases to carry out that processing. In general, we will use your Personal Data:

- For the purposes of complying with our legal obligations under pensions and other legislation;
- For the purposes of your participation in the Scheme, including complying with the Scheme's governing documents and trust law, paying benefits as they fall due, reaching decisions in relation to the exercise of discretionary powers and communicating with you in relation to membership of the Scheme;
- Where the processing is required in connection with a legitimate purpose of the Trustees, such as promoting the proper and efficient administration of the Scheme. This might include taking advice from the Trustees' external actuarial and legal advisors, purchasing insurance and meeting the expected standards of Scheme governance;
- Where you have consented to processing of Personal Data for a particular purpose. If you give consent for the Trustees to use your Personal Data for a particular purpose, you have the

right at any time to withdraw consent to the future use of your Personal Data for some or all of those purposes by writing to the Trustees at the address specified below. Note that this may affect your benefits.

### **How we share Personal Data**

The Trustees will not disclose any Personal Data to any third party, except as outlined above and / or as follows:

1. To anyone providing a service to the Trustees or acting as the Trustees' agent (which may include the Scheme administrator, the investment managers and companies within their group of companies, the actuary). In these circumstances, they will be acting as data processors;
2. In certain circumstances, where the Scheme's administrator or actuary is subject to a separate legal obligation requiring it to act as controller of the Personal Data;
3. To the employer where the employer has a legitimate interest in contacting you about your benefits under the Scheme;
4. You may also be a member of other retirement benefit arrangements operated by your employer. In order to provide you with more complete information on your retirement arrangements, the Trustees may share your Personal Data with the trustees of other group retirement arrangements or receive corresponding data from the trustees of those arrangements. In such cases we will seek to ensure that your data is processed by all parties in accordance with applicable data protection law;
5. The disclosure is required by law or regulation, or court or administrative order having force of law, for the purposes of legal proceedings, or is required to be made to any of the Trustees' regulators or to tax authorities.

In any case where the Trustees share Personal Data with a third party data controller, the use by that third party of the Personal Data will be subject to the third party's own privacy policies.

If you require any more information about the people who receive your Personal Data from us or to exercise your rights in relation to the data they hold, please contact us at the address specified below and we will put you in touch with them.

### **Security of Personal Data**

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. All processors to which we disclose your data are required by us to take appropriate security measures to protect your personal data in line with our requirements. We require these organisations to keep your information secure and we only permit them to process your Personal Data for specified purposes (and in accordance with our instructions) or in order to comply with applicable laws.

### **International transfers**

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside Ireland and, in some instances, the European Economic Area. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it. We will

ensure that any transfers of Personal Data outside of Ireland, which we or our processors make, are carried out in accordance with applicable data protection laws and that appropriate safeguards are implemented. Further information in relation to international data transfers can be obtained by contacting us at the address specified below.

### **Sensitive Personal Data**

The Trustees may, in limited circumstances, collect and process sensitive Personal Data in connection with their legal obligations under pensions legislation, the Scheme's governing documents and trust law obligations. Any sensitive Personal Data will only be used and disclosed, as necessary, for such purpose. Your explicit consent may sometimes be sought in order for us to process your Personal Data.

### **Updates to Personal Data**

The Trustees will use reasonable efforts to keep Personal Data up to date. However, you will need to notify the Trustees without delay in the event of any change in your personal circumstances, or those of the others mentioned above, so that the Trustees can keep the Personal Data up to date.

### **Retention of Personal Data**

Your Personal Data will be retained for no longer than is necessary for the purpose for which it was obtained by the Trustees or as required or permitted for legal, regulatory or fraud prevention purposes and to verify claims and queries relating to benefits.

The Trustees (or their service providers on their behalf) will need to hold some of your Personal Data until a period of twelve years has elapsed following the wind up of the Scheme.

### **Your Rights in relation to Personal Data**

You may at any time request a copy of your Personal Data from the Trustees. You also have the right to correct any inaccuracies in, and in certain circumstances, to request erasure, or restriction on the use, of your Personal Data, and to object to certain uses of your Personal Data, in each case subject to the restrictions set out in applicable data protection laws. You may also have the right to move, copy or transfer your Personal Data. Further information on these rights, and the circumstances in which they may arise in connection with our processing of Personal Data can be obtained by writing to us at the address specified below.

In any case where the Trustees are relying on your consent to process your Personal Data, you have the right to change your mind and withdraw consent by writing to the address specified below.

These rights can be exercised by writing to the Trustees/administrators at the address specified below.

You also have the right to lodge a complaint about the processing of your Personal Data by the Trustees with the Data Protection Commission at:

✉ Data Protection Commission, Canal House, Station Road, Portarlington, Co. Laois, R32 AP23

☎ +353 (0761) 104 800 or LoCall 1890 25 22 31

✉ info@dataprotection.ie

## **Contacting the Trustees and the Administrators**

Any queries or complaints regarding the use of the Personal Data by the Trustees and / or the exercise of individual rights should be addressed to the Trustees care of the Scheme administrator. We recommend that you provide as much detail as possible when sending requests to us so that we can deal with your query properly and efficiently.

The Scheme administrator can be contacted at:

✉ Citi Team, Aon, Block D, Iveagh Court, Harcourt Road, Dublin 2, D02 VH94

☎ +353 (1) 470 5331

✉ [citi.mailbox.ireland@aon.com](mailto:citi.mailbox.ireland@aon.com)

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