



PRIVACY NOTICE

FOR VODAFONE IRELAND DEFINED CONTRIBUTION PENSION PLAN (the "Plan")

In order to be able to operate and administer the Plan and pay your benefits, the Trustees of the Plan (**we** and **us**) need to collect a certain amount of personal information. For the purpose of the General Data Protection Regulation (**GDPR**) and the Data Protection Act 2018, we are a 'data controller' in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

1 CONTACT US

This privacy notice sets out how we, as a data controller, will use and protect your personal information. We will use your personal information only for the purposes and in the manner set out in this privacy notice. We recommend that you read this privacy notice carefully.

However, if you want more information about what we do with your personal information and what your rights are, please contact us at: The Trustee Secretary, Vodafone Ireland Defined Contribution Pension Plan, c/o Aon, Block D, Iveagh Court, Harcourt Road, Dublin 2.

2 WHAT PERSONAL INFORMATION WE CONTROL

We normally hold some or all of the following types of personal information:

- Your name, date of birth, gender, nationality, country of residence, your PPS number, bank account information (where benefits are in payment) and tax information;
- Contact details (including your address, phone number and email address);
- If your benefits from the Plan derive from your employment, details of your employer when you were building up benefits in the Plan, including how long you worked for them, retirement date, your salary from time to time, your dates of joining and leaving the Plan, details of your contributions to the Plan, dates and type of any statutory and non-statutory leave, details and dates of full-time and part-time status;
- other details including details of payments, transfers-in, refunds, transfers-out, retained, preserved or non-preserved benefits and other necessary information required to establish your entitlements under the Plan;
- Whether you are married or in a civil partnership and other information (such as details of your family, dependants (including children) and personal representatives and financial information about them and you) we might need to pay any benefits due on your death. We look for this only so that we can identify beneficiaries and dependents and to enable us to properly and effectively administer your benefits;
- Any information you have provided about who you would like to receive any benefits due on your death;
- Data relating to your physical or mental health for the purposes of ill-health early retirement or to evidence incapacity or dependency;
- Correspondence and minutes of meetings relating to grievance or Internal Dispute Resolution processes, data arising in relation to litigation or complaints;
- Records of email and other correspondence and telephone calls from or to you regarding your entitlements under the Plan;
- Details of your agents or advisers; and
- If your benefits from the Plan form part of a divorce or judicial separation settlement, details of that settlement.

3 SPECIAL CATEGORIES OF DATA

Sometimes we are required to hold other, more sensitive, information about you which are called special categories of data under the GDPR such as information about your health where applicable. In rare circumstances, and only where relevant to you and where it is relevant to the payment of Plan benefits, we process information about criminal convictions and offences.

4 WHERE WE GET PERSONAL INFORMATION FROM

Some of the personal information we collect comes directly from you. In addition, Aon, who currently administers the Plan on behalf of the Trustees, and any former and future Plan administrators, may have obtained, or may in the future obtain personal information from you and pass it to us.

Sometimes we get personal information from other sources: for example, from your advisors, from your Plan employer (for information such as your salary and length of service and other employment information); from another pension arrangement; from government departments and agencies such as the Revenue Commissioners and the Department of Employment Affairs and Social Protection; and from publicly accessible sources (e.g. the electoral roll) if we have lost touch with you and are trying to find you.

If we need to ask you for other personal information in the future (for example, about your health), we will explain whether you have a choice to provide that personal information or not. We will also explain the consequences for you if you do not provide it.

YOUR DEPENDENTS AND BENEFICIARIES

In certain circumstances you may provide us with personal information relating to third parties (e.g. your dependants or beneficiaries). **Please ensure that you provide a copy of this Notice to any third party whose personal information you provide to us or have provided to us previously.**

IF YOU DON'T PROVIDE PERSONAL INFORMATION TO US

If you do not provide us with your personal information we may not be able to provide your benefits, comply with our legal obligations or manage the Plan. In all instances where we ask for your personal information, we will identify if there is a statutory reason for requesting such information and we will explain the consequences for you if you do not provide it.

5 PURPOSE AND LEGAL BASIS FOR PROCESSING

	Purpose for processing	Legal Basis for processing
Personal information	To provide benefits in accordance with the Plan's governing documentation and relevant legislation, which includes paying benefits as they fall due; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated, ensuring the standards of Plan governance are met (including standards set out in Pensions Authority guidance).	In order to comply with our legal obligations under pensions legislation, trust law, European law, Revenue law and other applicable laws.
	To establish and defend our legal rights, to prevent and detect crimes such as fraud and to comply with our legal obligations. We may need to share your personal information with other people for this reason, such as courts and law enforcement agencies and our advisers.	

	<p>To disclose your data to the recipients listed below in section 6 in order to administer and operate the Plan effectively.</p>	<p>For our legitimate interests in administering and operating the Plan and for the legitimate interests of Vodafone in operating and managing its business.</p> <p>In identifying this basis, we have weighed our legitimate interest against your rights and freedoms and determined that our legitimate interest to properly manage the Plan is not overridden by your rights as a data subject. If you would like further information on how we balanced these interests you can contact us using the details below.</p> <p>Please note that you have a right to object to processing of your personal information where that processing is carried on for our or Vodafone's legitimate interests. This may affect what we can do for you / the provision of Plan benefits, unless we have another lawful reason for using your information.</p>
	<p>For corporate reorganisations and sales related to the employer group companies.</p>	
<p>Special categories of personal information</p>	<p>We process information concerning your health where necessary and proportionate for the purposes of administering the Plan.</p>	<p>This processing will be done as permitted under Irish data protection law with suitable measures in place to safeguard your rights.</p>
<p>Criminal Convictions Data</p>	<p>In very limited circumstances, the Plan rules may mean the Trustees will receive from the employer criminal conviction data. In general, the Trustees will look to avoid needing to receive such data and where it is unavoidable, the Trustees will process it only to the extent necessary to meet its obligations under the Plan Rules and will cease to process such data once that obligation has been met.</p>	<p>As permitted under Irish data protection law and as necessary for the purposes of establishing, exercising or defending legal rights, subject to suitable and specific measures being taken to safeguard your rights.</p>

6 HOW WE SHARE YOUR PERSONAL INFORMATION

We may share your personal information with the following people at present:

- the Plan employers and members of the employers' group of companies;
- the Plan administrator;
- any new trustees or trustee directors of any corporate trustee;
- auditors;
- the Revenue Commissioners;
- the Data Protection Commissioner;
- IT and data storage providers;

- authorised brokers;
- actuarial advisers;
- your relatives or legal personal representatives (where necessary to provide benefits in the event of your death);
- other support service providers and advisers necessary to support the Trustees in the administration of the Plan;
- other regulatory bodies to whom we are obliged or required to disclose your personal information;
- our professional advisers;
- insurers and life assurance companies;
- the Pensions Authority;
- the Financial Services and Pensions Ombudsman's Bureau of Ireland; and
- the Workplace Relations Commission, Courts, Court appointed persons.

In certain circumstances we will also need to provide the administrators and trustees of other pension arrangements with personal information about you (for example, where your benefits are transferred to such other arrangement and for the purpose of calculating any benefits payable to or in respect of you). We also share your personal information with the Plan's employers also so they can contact you about your benefits under the Plan, and any additional options which may be available to you in relation to those benefits.

We may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Plan.

7 HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR

We need to keep your personal information long enough to make sure that we can:

- pay any benefits due to or in respect of you;
- satisfy our legal obligations in relation to the Plan; and
- exercise any legal rights or defend any legal claims which may arise in connection with the management of the Plan.

Typically this will require that we hold your personal information for the duration of the term of the Plan (its winding up and dissolution) plus a period of 13 years.

8 YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

Your Right	What this means
Right to withdraw consent	If we are relying on your consent to allow us to process your information, you can withdraw your consent at any time. From that point on we would no longer be able to carry out the processing we were carrying out with your consent. Any processing we carried out before you withdrew your consent would remain valid. This may affect what we can do for you, unless we have another lawful reason for using your information.
Right of access	You have the right to be given details about the personal information we have about you and why and how we process that data. You also have the right to be given a copy of the personal information we hold about you. This is known as a data subject access request. To make a subject access request please contact us at the contact details set out at section 1 above.
Rights of rectification	You have the right to have us correct any inaccuracies in the information we have

	about you.
Right to be forgotten:	<p>You have the right to request that your personal information be deleted in certain circumstances including:</p> <ul style="list-style-type: none"> • where the personal information is no longer needed for the purpose for which it was collected; • where you withdraw your consent (where the processing was based on consent); • where you object to the processing and there are no overriding legitimate grounds justifying us processing the personal information (see Right to Object below); • where the personal information has been unlawfully processed; or • to comply with a legal obligation. <p>However, this right does not apply where, for example, the processing is necessary:</p> <ul style="list-style-type: none"> • to comply with a legal obligation; or • for the establishment, exercise or defence of legal claims.
Right to Data Portability	<p>Where you have provided personal information to us, you have a right to receive such personal information back in a structured, commonly-used and machine-readable format, and to have that personal information transmitted to a third-party data controller without hindrance but in each case only where:</p> <ul style="list-style-type: none"> • the processing is carried out by automated means; and • the processing is based on your consent or on the performance of a contract with you. <p>Where you seek to exercise your right to data portability and transfer personal information to us from another data controller, we will only keep the data that is necessary for and relevant to us, and will destroy any other personal information we receive.</p>
Right to object:	<p>You have the right to object to the processing of your personal information, which we process on the basis of a legitimate interest. We will then stop processing this personal information unless we can show compelling legitimate grounds for the processing that outweighs your interests, rights and freedoms or unless we need to use it in relation to legal claims. It should be noted that if you exercise a right to object to the processing, it may affect our ability to properly provide benefits to or in respect of you under the Plan.</p>
Right to restrict processing:	<p>In the following circumstances you have the right to restrict the processing of your personal information:</p> <ul style="list-style-type: none"> • where you think the personal information we have is not correct. We will restrict the processing of your personal information, while we check the accuracy of your personal information; • where the processing is unlawful and you ask that the processing be restricted but you do not want the personal information to be deleted; • where we no longer need the personal information for the purposes of the processing, but you need it for the establishment, exercise or defence of a legal claim; and • We will also restrict the processing of your personal information where you

	have objected to processing under the Right to Object while we check if your rights outweigh our grounds for processing the personal information.
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You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant.

To exercise these rights, please use our contact details, which are set out at section 1 above. We can also supply more information about these rights to you, on request.

9 KEEPING YOUR PERSONAL INFORMATION SAFE

When we pass your personal information to a third party, we seek to ensure that they have appropriate security measures in place to keep your personal information safe and to comply with general principles in relation to data protection.

10 TRANSFERRING YOUR PERSONAL INFORMATION ABROAD

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 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.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

11 AUTOMATED DECISION MAKING

As you may be aware, the Plan operates a default investment strategy (the **Default Strategy**). Members who do not elect their own investment strategy under the Plan will have their retirement account automatically invested in accordance with the Default Strategy. The Default Strategy involves automatic and phased movements in investments towards less volatile investments as the members draw closer to retirement. The significance and consequence of this is to reduce investment risk for members in the period up to retirement age but this may lead to reduced return on those investments. Compliance with the Default Strategy is a term of the Plan and is necessary for the Trustees to perform their obligations in respect of the provision of Plan benefits for members of the Plan who do not elect their own investment strategy. Further details regarding the Default Strategy are available in the Plan's Explanatory Booklet.

12 YOUR RESPONSIBILITIES

You should keep us informed of any changes to your personal or special information.

13 COMPLAINTS

If you have concerns about the way we handle your personal information, please contact us using the contact details at section 1 above. You have the right to complain to the Office of The Data Protection Commission, Canal House, Station Road, Portllington, Co. Laois, R32 AP23. Tel.: +353 (0) 761 104 800. E-Mail: info@dataprotection.ie.