

# Public Authority Pension Services Limited (PAPS) Privacy Policy

12<sup>th</sup> November 2019

Directors Caroline Hickey, Mark Keane

Tel 086 3264511 / 086 8345880 Email [info@paps.ie](mailto:info@paps.ie) Web [www.paps.ie](http://www.paps.ie)

## Table of Contents

<a href="#">Table of Terms</a> .....	3
<a href="#">PAPS Privacy Statement and Use of Information Notice</a> .....	4
<a href="#">Who we are?</a> .....	4
<a href="#">Overview of Privacy Policy</a> .....	5
<a href="#">Why do we need to collect personal data for Data Subjects?</a> .....	5
<a href="#">Use of information and Lawful basis of processing</a> .....	5-6
<a href="#">What legal obligations do we have?</a> .....	6
<a href="#">Data we collect from you</a> .....	7
<a href="#">Who do we share your personal information with?</a> .....	7
<a href="#">Where information may be processed outside the EEA</a> .....	7
The period of storage and retention of personal data .....	7
<a href="#">Your rights of access, rectification, erasure or restriction of processing</a> .....	8
<a href="#">Your right to lodge a complaint with the supervisory authority</a> .....	8
<a href="#">Where you are obliged to provide information the consequences of failure to do so</a> .....	8
<a href="#">Existence of automated decision making or profiling</a> .....	9
<a href="#">Information on further processing of data beyond the original reason for collection</a> .....	9
<a href="#">Security and Confidentiality</a> .....	9
<a href="#">Updates to our Data Protection Notice</a> .....	9
<a href="#">Appendix A: Data Sets</a> .....	10
<a href="#">APPENDIX B: Third Parties / Service Providers*</a> .....	11

Directors Caroline Hickey, Mark Keane

Tel 086 3264511 / 086 8345880 Email [info@paps.ie](mailto:info@paps.ie) Web [www.paps.ie](http://www.paps.ie)

## Table of Terms

<b>Data Processor</b>	Public Authority Pension Services Limited is the registered party processing data
<b>Data Subject</b>	Current Employees, Previous Employees and Pensioners of Public Sector Bodies
<b>Data Sets</b>	Specific elements of data we collect, e.g. name, address, date of birth would be three data sets
<b>GDPR</b>	General Data Protection Regulation Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016
<b>Personal Data</b>	means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one <b>who can be identified, directly or indirectly</b> , in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
<b>Profiling</b>	means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements
<b>Sensitive Personal Data</b>	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation

Directors Caroline Hickey, Mark Keane

Tel 086 3264511 / 086 8345880 Email [info@paps.ie](mailto:info@paps.ie) Web [www.paps.ie](http://www.paps.ie)

## PAPS Privacy Statement and Use of Information Notice

This is your guide to how PAPS manage the personal data of your Data Subjects. On the 25<sup>th</sup> May 2018 the General Data Protection Regulation 2016 takes effect. Under this regulation we need to provide you with information on the following:-

1. [Who we are](#)
2. [What information we collect from you](#)
3. [For what processing purpose are we collecting information and under what legal basis](#)
4. [The recipients of the data we collect from you](#)
5. [Where information is processed outside the EEA and the safeguards in place](#)
6. [The period of storage of personal data](#)
7. [Your rights of access, rectification, erasure or restriction of processing](#)
8. [Your right to withdraw consent where processing is on that basis](#)
9. [Your right to lodge a complaint with the supervisory authority](#)
10. [Where you are obliged to provide information the consequences of failure to do so](#)
11. [Existence of automated decision making or profiling](#)
12. [Information on further processing of data beyond the original reason for collection](#)

### Who we are?

Public Authority Pension Services Limited (PAPS) provide a comprehensive range of technical pensions expertise and administrative support services to those responsible for the management and administration of Public Sector Pension Schemes.

PAPS are a Data Processor which means that we receive personal data from Public Sector Bodies in relation to their current employees, previous employees and pensioners (“Data Subjects”).

PAPS can be contacted as follows:-

**Address:** Father Mathew Hall  
131 Church Street  
Dublin D07 E363

**Email:** [info@PAPS.ie](mailto:info@PAPS.ie)

**Website:** [www.PAPS.ie](http://www.PAPS.ie)

**Phone no.:** +353 1 8737440

If you wish to discuss any aspect of our Data Privacy policy in relation to your contract with us you can contact us at [dataprotection@paps.ie](mailto:dataprotection@paps.ie).

Directors Caroline Hickey, Mark Keane

Tel 086 3264511 / 086 8345880 Email [info@paps.ie](mailto:info@paps.ie) Web [www.paps.ie](http://www.paps.ie)

## Overview of Privacy Policy

In order to provide services to you, we require certain Personal Data and other information relating to your Data Subjects. Personal data in this Notice means any information which PAPS has or obtains or which you provide, such as your Data Subjects' name, address and date of birth, from which they can be directly or indirectly personally identified. PAPS will act as a data processor in relation to your Data Subject's personal data in compliance with the General Data Protection Regulation 2016.

## Why do we need to collect personal data for Data Subjects?

We need to collect certain personal information ("Data sets") in relation to your Data Subjects' because we are providing you with a pension support service and / or pension administration service and need to process this information to fulfil our legal obligations under the contract you have signed and/or other arrangements you have agreed with us.

## Use of information and Lawful basis of processing

PAPS will use your Data Subjects' personal data for the following purposes:-

### To fulfil our contractual obligations to our client:

1. When we receive your Data Subjects' data from you, the Public Sector Body, we import the data into spreadsheet templates to produce the following calculations, as required:
  - Ad Hoc and Annual benefit statements
  - Benefit option statements for Retirement/Leavers/Death in Service
  - Preserved benefit statements
  - Purchase of notional service
  - Death Gratuity
  - Ill health retirement benefits
  - Cost Neutral Early Retirement
  - Survivor's pension
  - Children's pension
  - Transfers of service and transfer values
  - Contribution payments/repayments
  - Professional Added Years
2. Alternatively when we receive your Data Subjects' personal data from you, the Public Sector Body, we use this data to draft responses to you either in a word document / spreadsheet / pdf / email as follows:

Directors Caroline Hickey, Mark Keane

Tel 086 3264511 / 086 8345880 Email [info@paps.ie](mailto:info@paps.ie) Web [www.paps.ie](http://www.paps.ie)

- To offer guidance on compliance with Department of Public Expenditure and Reform (DPER) legislation, circulars, rules and regulations on public sector superannuation schemes.
  - To assist you in meeting your obligations under current pensions legislation or otherwise
  - To verify the correct scheme classification of members
  - To verify correct salary to use in benefit calculation
  - To verify membership of Survivors' and Children's (S&C) Scheme and potential contributions owing
  - To verify previous public sector service and to verify if previous service can be made reckonable and potential contributions owing in relation to same
  - To verify previous public sector service has been transferred
  - Support in relation to Public Sector and Local Government Transfer of Service schemes
  - To explain the impact of any Pension Adjustment Order (PAO) on the member's Retirement Benefits
  - To meet members during one to one sessions
3. PAPS receive data from Public Sector Bodies in relation to their Superannuation Schemes which we use to:
- Assist the bodies with drafting and updating their staff and survivor's and children's superannuation schemes in line with the public sector Model Schemes, DPER directives and legislative changes.
  - Update information booklets, leaflets and announcements on the schemes for circulation to members
  - Provide Staff Information sessions

## PAPS support arrangements with public sector bodies are contract and not consent based

PAPS undertake to keep your Data Subjects' personal data and all related information held private and confidential and we shall not use or disclose to any third party except where obliged by a court or regulatory body.

## What legal obligations do we have?

Your relationship with PAPS is governed by a contract which provides you with the terms and conditions of the services we provide to you. Our relationship will continue until the termination of the contract. As part of fulfilling that contract we need to collect, use, store and delete personal data sets relating to your Data Subjects. All data relating to your Data Subjects will be deleted within one year of the contract ending.

Directors Caroline Hickey, Mark Keane

Tel 086 3264511 / 086 8345880 Email [info@paps.ie](mailto:info@paps.ie) Web [www.paps.ie](http://www.paps.ie)

## Data we collect from you

PAPS collect several pieces of Data Subjects' personal information from you over the course of our contractual relationship. The specific core data sets are listed in [Appendix A](#). These can vary over time and we may tailor this to your specific circumstances.

## Who do we share your personal information with?

PAPS share personal information with specified third parties who support important processing functions that we carry out, for example IT. Where we engage third parties we will have a contract in place to govern our relationship or we may have a Service Level Agreement in place to monitor third party performance. Examples of third parties who may act as processors on our behalf:-

- We use an Information Technology firm called TerraAlto to maintain our systems.
- We engage the services of AWS for cloud computing services and storage.
- We may in the future work with companies that support PAPS to identify and analyse user behaviour on our website which use cookies, for example Google Analytics.

## Where information may be processed outside the EEA

We may need to share information with organisations who are located or undertaking processing outside the EEA. This may mean that your Data Subjects' personal information may be processed in countries such as the U.S.A. in relation to AWS. There are currently measures in place to ensure AWS stores data in Ireland. We will only transfer personal information to a country outside the EEA if that country provides an adequate level of protection as set by the European Commission or where the transfer is made under a legally binding agreement containing model contractual clauses, EU-US Privacy Shield frameworks or other similar approved mechanisms. We also have service agreements in place with processors we use to service our contract with you e.g. IT service providers and have Service Level Agreements (SLA) in place.

## The period of storage and retention of personal data

PAPS will delete your Data Subjects' data within 1 year of the termination of our contract.

Directors Caroline Hickey, Mark Keane

Tel 086 3264511 / 086 8345880 Email [info@paps.ie](mailto:info@paps.ie) Web [www.paps.ie](http://www.paps.ie)

## Your rights of access, rectification, erasure or restriction of processing

In the event that PAPS receive any of the following requests from a Data Subject we will advise the body of such requests and assist the body (data controller) in complying with GDPR requirements in relation to the request:

- a) Right of access
- b) Right of rectification
- c) Right to be forgotten
- d) Data portability
- e) Right to Object
- f) Right to restriction of processing

## Your right to lodge a complaint with the supervisory authority

If you are unhappy with any aspect of our Privacy policies and procedures and are not satisfied with PAPS's responses, you are entitled to lodge a complaint with the Office of the Data Protection Commissioner:-

**Office of the Data Protection Commissioner**  
Canal House  
Station Road  
Portarlinton  
Co. Laois  
R32 AP23

**Phone:** +353 57 868 4800  
+353 761 104 800  
**Lo Call:** 1 890 252 231  
**Fax:** +353 57 868 4757

**Email:** [info@dataprotection.ie](mailto:info@dataprotection.ie)

**Website:** [www.dataprotection.ie](http://www.dataprotection.ie)

## Where you are obliged to provide information the consequences of failure to do so

As outlined in this notice PAPS collect, use, store and delete personal data sets relating to your Data Subjects (collected from you) as part of doing business. When you enter a contract with us by availing of one of our services we need to collect information to perform our part of the contract. As such if you fail to provide information as requested by us we will be unable to provide the requested service. If you are an existing client and fail to provide additional information as requested we may be unable to continue to provide you with a service and we may be forced to terminate our contract.

Directors Caroline Hickey, Mark Keane

Tel 086 3264511 / 086 8345880 Email [info@paps.ie](mailto:info@paps.ie) Web [www.paps.ie](http://www.paps.ie)

## Existence of automated decision making or profiling

PAPS do not carry out any automated decision making or profiling.

## Information on further processing of data beyond the original reason for collection

PAPS do not carry out any further processing of data beyond the original reason for collection.

## Security and Confidentiality

PAPS will take all reasonable measures using technological methods and internal policies and procedures to ensure the protection of your data. We do this by ensuring our data and premises are physically protected and access is via employee fob to secure areas. Access to our systems is only provided to authorised persons and we employ techniques such as encryption when sending data externally and where possible we anonymise data.

## Updates to our Data Protection Notice

We will keep this notice under regular review and will update it from time to time to reflect changes in the way we process personal information. The most recent version will be available at [www.paps.ie/Privacy Notice](http://www.paps.ie/Privacy Notice).

Directors Caroline Hickey, Mark Keane

Tel 086 3264511 / 086 8345880 Email [info@paps.ie](mailto:info@paps.ie) Web [www.paps.ie](http://www.paps.ie)

## Appendix A: Data Sets

1. Name
2. Date of Birth
3. Contact details (email address, phone number & home address)
4. PPSN
5. Salary Information
6. Salary History (including P60's)
7. Employment History
8. Previous Pension Entitlements (including private pension entitlements)
9. Medical (notification of sick leave record but not medical history)
10. Unpaid leave history
11. Marital status
12. Family status
13. Pension Adjustment Order (PAO)
14. Contribution Record
15. Benefit entitlements
16. Options on retirement
17. Details of Disputes with Employer in relation to Pension Entitlements
18. Normal Retirement Age
19. Occupation
20. Email address
21. Gender
22. Ill Health retirement
23. Date of Death

Directors Caroline Hickey, Mark Keane

Tel 086 3264511 / 086 8345880 Email [info@paps.ie](mailto:info@paps.ie) Web [www.paps.ie](http://www.paps.ie)

## APPENDIX B: Third Parties / Service Providers\*

*\* As at 12<sup>th</sup> November 2019*

Entity	Primary Service Category	Jurisdiction
Amazon Worldwide Services	IT Cloud services	Ireland/U.S.A
TerraAlto	IT Service provider	Ireland
Cyclone	Secure shredding	Ireland

Directors Caroline Hickey, Mark Keane

Tel 086 3264511 / 086 8345880 Email [info@paps.ie](mailto:info@paps.ie) Web [www.paps.ie](http://www.paps.ie)