

## CPAS Data Privacy Notice

Effective 25 May 2018

CIF Pension Administration Services DAC (“CPAS”) is committed to protecting the privacy of our clients and users (you/your) who visit our website [www.cpas.ie](http://www.cpas.ie) (the “Website”).

This Privacy Notice sets out the basis on which we will process any personal data we collect from you through our Website and which relates to you or to any individual connected with you, how this personal data will be used, and the ways in which we will protect any personal data you choose to provide us via this Website.

### Information we collect about you

“Personal Information” is any information relating to an identified or identifiable individual. The following is personal information we may collect through our Website.

#### (a) Information voluntarily provided by you.

This is any information you may voluntarily submit to us by completing “Get In Touch” form on our Website or sending us email directly via our “Careers” section on our website. This includes but is not limited to the following:

- Your name, date of birth, email address, postal address, telephone or mobile number, occupation and other contact information;
- Any interest you have in relation to services provided by CPAS;
- Information regarding your dealings with us;
- Job application

Any personal information you send us will be used only for the purposes indicated in this notice.

#### (b) Website and communication usage

Details of your visits to the Website and information collected through cookies and other technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources you access.

### How do we use your personal information?

This section sets out the purposes for which we use personal information that we collect, It also identifies the legal basis on which we rely to process the information.

We use your personal information to:

Purpose for processing	Legal basis for processing
To correspond effectively with you and conduct our business, including to respond to your queries or to carry out our obligations arising from any agreements or contracts entered into between you and CPAS.	<ul style="list-style-type: none"> <li>• Performance of a contract i.e., processing your personal information is necessary for us to provide you with CPAS products and services;</li> <li>• Legitimate interests i.e., the interests of CPAS in conducting and managing our business when providing products and services.</li> </ul>
To provide you with certain marketing material including updates and offers.	<ul style="list-style-type: none"> <li>• Consent i.e., you have chosen to receive these;</li> <li>• Legitimate interests i.e., the interests of CPAS in keeping you updated with news in relation to our products and services.</li> </ul>
To monitor certain activities to ensure service quality and compliance with legislation and internal procedures.	<ul style="list-style-type: none"> <li>• Legitimate obligations;</li> <li>• Establishment, exercise or defence of legal claims;</li> <li>• Legitimate interests i.e., the interests of CPAS in ensuring the quality of our products and services.</li> </ul>

Directors: M. Browne (Chairman), C. Cusack, H. Fitzpatrick, J. O’Shaughnessy

To notify you of events or changes to our products and services.	<ul style="list-style-type: none"> <li>• Legitimate interests i.e., the interest of CPAS in keeping you informed</li> </ul>
To Comply with legal or regulatory obligations.	<ul style="list-style-type: none"> <li>• Legitimate obligations;</li> <li>• Establishment, exercise or defence of legal claims;</li> <li>• Legitimate interests i.e., the interests of CPAS in cooperating with law enforcement and regulatory authorities.</li> </ul>

## Who do we share your personal data with?

We do not rent, sell or otherwise disclose personal information about our online visitors with unaffiliated third parties for their own marketing use.

For the purposes of providing our products and services to you, we may provide relevant personal information to:

- Other companies within the CPAS group;
- IT service providers;
- Cloud and other data storage providers;
- External printing and office support providers; and
- Trusted charity partners (e.g., Irish Heart Foundation, Pieta House and Lighthouse).

We may also disclose personal information if required to do so by law and believe that such action is necessary to conform with the law.

If we provide your personal information to the above-mentioned third parties, we will take all reasonable precautions regarding the practices utilised by them in protecting your personal information. Those third parties will be required to: (i) keep your information safe and secure; and (ii) handle your information on our behalf and in accordance with our instructions.

## Where do we store your personal data?

The information that we collect from you will be transferred to and stored at/processed in the European Economic Area (the EEA). We will take all the steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Notice.

We will only transfer your information outside of the EEA where we have adequate measures in place to provide appropriate safeguards such as the Privacy Shield (where the recipients comply with the US Department of Commerce's EU-US Privacy Shield) or use of model contractual clauses approved by the European Commission.

## How long will we keep your personal data?

We will retain your personal information as long as necessary to fulfil the purpose(s) outlined in this Privacy Notice unless a longer retention period is required or permitted by law or it is needed to defend or pursue legal claims. Our retention period are based on CPAS business needs and your personal information that is no longer needed is either securely destroyed or anonymised.

## Your rights

You have certain rights in relation to the personal information we hold about you. Some of these only apply in certain circumstances as set out below.

You can exercise your rights by contacting us. Please note that we will require you to verify your identity before we respond to any of your requests. We must respond to a request by you to exercise those rights without undue delay and at least within one month (although this may be extended by a further two months in certain circumstances).

We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

- **Right of access** – You have the right to request a copy of the information that we hold about you;
- **Right of rectification** – You have the right to correct data that we hold about you that is inaccurate or incomplete;
- **Right to be forgotten (Right to erasure)** – You have the right under certain circumstances to have your personal information erased from our records if your data is no longer necessary for the purpose for which it was collected, and we have no other legal basis for processing the data;
- **Right to restrict processing** - You have the right to restriction of processing where certain conditions apply;

- **Right of portability** – You have the right to data portability, which requires us to provide personal information to you or another data controller in a commonly used, machine readable format, but only where the processing of that information is based on consent or the performance of a contract to which you are a party;
- **Right to object** – You have the right to object to any processing of your personal information at any time, but only where such processing is based on our legitimate interests as its legal basis;
- **Right to withdraw consent** – You have the right to withdraw your consent by contacting us as the contact details below, but only where processing is based on consent.

## Direct Marketing

Direct marketing usually involves an organisation attempting to promote a product or service, or attempting to get you to request additional information about a product or service, by targeting you as an individual.

CPAS, Milestone Advisory DAC, as an operating division of CPAS and others within the CPAS group (i.e., CWPS, CERS & CIRT, CWSPT), Construction Industry Federation and appointed construction related and trusted partner charities (e.g., Irish Heart Foundation, Pieta House, Lighthouse) may contact you about products and services they provide where you have consented to receiving information about these products and services.

If you do not wish to use your data for this reason after you have provided your consent, please telephone us on +353 (1) 407 1400 or email us at [optout@cpas.ie](mailto:optout@cpas.ie). You will also be given an opportunity to opt-out of receiving such messages and information on each occasion.

## Technical information (including cookies) that we collect about you

When you visit our Website, we collect technical information about your computer, such as your internet protocol (IP) address (which is a number that can uniquely identify a specific computer on the internet), time zone setting, your login information, browser type and version, browser plug-in types and versions, operating systems and platforms.

We use essential cookies to ensure our Website operates correctly and also non-essential cookies to collect information about your browsing activities over time following your use of our services. They allow us to recognise and count the number of users and to see how users move around our Website when they are using it. This helps us to improve the services we provide to you and the way our Website works.

## Complaints

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at [dataprotection@cpas.ie](mailto:dataprotection@cpas.ie) and we will endeavour to deal with your request as soon as possible. This does not affect your right to raise a complaint with the Data Protection Commission, 21 Fitzwilliam Square North, Dublin 2, D02 RD28, further details of which can be found at [www.dataprotection.ie](http://www.dataprotection.ie) or by contacting their office on +353 761 104 800 or +353 578 684 800.

## Changes to this Privacy Notice

We may update this Privacy Notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. Updates are effective from the date on which they are notified to users or posted on the Website.

## Contact

If you have any queries or concerns please contact:

Address: CPAS, Linden House, 4 Clonskeagh Square, Clonskeagh Road, Dublin 14, D14 FH90

Tel: +353 (1) 407 1400

E-mail: [dataprotection@cpas.ie](mailto:dataprotection@cpas.ie)