

AIB Group UK Pension Scheme

Data Privacy Notice

Who we are

As the Trustees of the Scheme, we hold certain personal information (known as “personal data”) about Scheme members and, where applicable, their dependants and beneficiaries. Most of the personal data held and processed by the Trustees in running the Scheme will be personal data (in other words, it is information from which you as an individual can be identified).

For legal purposes, the Trustees are known as the “data controller” as we decide the purposes for and the means by which the personal data we hold is processed.

What information do we collect about you?

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your address
- your national insurance number
- details of your bank account to pay benefits to if you are a pensioner or if we are paying a lump sum to you
- details about your dependants and/or beneficiaries where this is needed so that we can pay benefits following your death
- if you apply to begin to receive benefits on grounds of ill health, medical and other details about your health
- other contact information such as email and telephone number
- employer name and dates of service
- details of historic pension arrangements and pension contributions
- if you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, a “pensions identifier”, which is a string of characters used to identify your specific benefits under the Scheme.

How we gather your personal information

We gather personal information from a number of sources including the following:

- directly from you

- from your current or former employer
- from persons acting as personal representatives of a deceased person's estate
- from a public body such as HMRC
- from public databases such as the Register of Births, Deaths and Marriages
- from other pension schemes, where transfers into the Scheme have been made
- from an independent financial adviser, solicitor or other person instructed by a person to provide us with information
- from our advisers
- from third parties used to trace members or beneficiaries with whom we have lost contact
- with your consent, from a registered medical practitioner
- from other third parties including, for example, your next of kin or anyone else entitled to benefit from your membership of the Scheme.

How do we use that information?

The Trustees need to hold and process information about you as it is needed for us to administer the Scheme and to calculate and pay benefits. In legal terms, this means that we have a legitimate interest in processing the information. We also process and retain personal data:

- in order to allow us to comply with our obligations towards members under the Scheme's governing documents, as well as under relevant legislation; and
- to the extent required to comply with our duties in relation to individuals using pensions dashboards. This includes "matching", where we use personal data that a user had provided to search our Scheme records to check whether that user is a member of the Scheme, and where we collect further personal data from that user in the event of a "possible match".

We will not collect any personal data from you that we do not need.

Personal data relating to the Scheme is held on paper and on computer systems. As the "data controller", the Trustees must process this information fairly and lawfully.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries. This is known as "sensitive personal data" and it includes information that relates to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

Who do we share it with?

We are not allowed to share personal data about you with other organisations and people, unless the law allows us to or you have given your consent. As we need to share information with others in order to provide you with benefits, there is a legitimate interest in the Trustees sharing this information. We may also need to share it in order to meet contractual and other legal obligations. Some parties with whom we share data may be (or may use subsidiaries who are) based outside of the UK as providing an adequate

level of protection for personal data. In these cases, adequate safeguards are put in place to ensure your data is kept secure.

We share personal data with the following:

- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustees
- your employer (ie the company that employed you while you are or were a member) and other companies in the group, which may include group companies which are based outside the UK
- the Scheme's professional advisers, including the Scheme actuary, auditor, medical advisers, investment adviser, lawyers and Scheme Secretary
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustees can be fined and subject to other action if they fail to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you, such as the Summary Funding Statement and annual benefit statement which we may be required to provide in future
- third parties that form part of the “dashboard ecosystem” that enables pensions dashboards services to work, as well as the Scheme's Integrated Service Provider (ISP), which provides a service allowing pensions information from the Scheme to be connected to the dashboard ecosystem
- our appointed insurance company or companies for the purposes of additional voluntary contributions and bulk annuity (or buy-in) transactions
- depending upon how we pay pensions and/or lump sums, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System) in the UK and/or a payment via the administrators' banking providers when pensions are being paid overseas
- tracing agencies who assist the Trustees with updating scheme data from time to time.

How long do we keep personal data for?

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction. But, given the nature of pension schemes, the Trustees may be required to keep some of your personal information for the rest of your life so that we have the information we need in order to pay benefits and to answer queries relating to your benefits.

We review the personal data held in relation to the Scheme on a regular basis in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

Your rights

- You have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- If at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected
- You can require the Trustees to restrict/limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- You can object to your personal data being processed, although the Trustees can override this objection in specific instances
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.
- You can request that your personal data is deleted altogether, although the Trustee can override this request in specific instances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, the ability for you to build up benefits and our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustees can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- make a complaint about how we have handled your personal data

Please contact

E-mail: AIBUKPENSIONS@AONCONSULTING.CO.UK

Telephone number: [+353 21 435 7880](tel:+353214357880)

Address: Aon Hewitt, Building 5200, Hiberian House, Cork Airport Business Park, Cork, Ireland

Making a complaint to the Information Commissioner’s Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner’s Office whose helpline number is: **0303 123 1113**.

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