

# ***PwC Defined Benefit Retirement Pension Plan Privacy Notice***

Last Updated: January 2024

## **Introduction**

The Trustee Directors of the PwC Defined Benefit Retirement Plan (“**the Trustee Directors**”, “**we**”, “**us**”, or “**our**”) recognise that your privacy is important to you. This Privacy Notice explains what information about you we collect, why we collect it, how we use, store and transfer it, and your legal rights. This Privacy Notice applies to all active members of the PwC Defined Benefit Retirement Plan.

## **Who decides what happens to your information?**

For most purposes, the PwC Defined Benefit Retirement Plan Trustee Directors located at PwC, One Spencer Dock, North Wall Quay, Dublin 1, Ireland, will decide what happens to the information we collect about you.

As we decide how and why information is collected and processed, we are the controller of your information. For example, we are controller of information in instances where we use your information in connection with managing your pension entitlements in the PwC Defined Benefit Retirement Plan. We will process such information in accordance with this Privacy Notice and applicable data protection laws.

## **Information we collect about you:**

In connection with managing your pension entitlements with us, we will collect, store, share and process your information, including special categories of information, on computer and in manual files/paper files.

We collect and process your information including, but not limited to, the following:

- **Personal details and contact information:** This includes information such as your name, date of birth, contact information (e.g. home address, telephone number and personal email address), national identification or personal public service number, gender, marital or civil partnership status, dependents and next of kin information.
- **Work information and history:** This includes description of your terms of employment, salary and bonus information, length of service and retirement eligibility.
- **Compensation and benefits information:** This includes your salary and bonus information, banking details and other benefits information (including the name, age, national identification or personal public service number for any spouse, minor children or other eligible dependents and beneficiaries) and details of pension.
- **Special categories of information:** In certain circumstances, we collect and process certain special categories of information. Special categories of information include information which reveals an individual’s race or ethnic origin, political opinions or religious or philosophical beliefs, membership of a trade union, genetic or biometric data, or data concerning physical or mental health or sexual orientation/sex life. Examples that we may collect or process include medical

assessments, sick leave documentation, maternity leave documentation and may include in certain circumstances disciplinary or grievance information.

We endeavour to keep all information we collect up to date and request assistance from you in this regard. If there are any changes to your information, please notify the PwC Defined Benefit Retirement Plan Trustee Directors, PwC, One Spencer Dock, North Wall Quay, Dublin 1, Ireland.

### **Dependants' information**

You may decide to provide us with certain information relating to your dependents, such as a current or former spouse or civil partner, family members or beneficiaries. If you provide us with information about your dependents, such as contact information or special categories of information (such as health-related information), it is your responsibility to inform such individuals of their rights and to obtain their explicit consent to this. You should also provide them with a copy of this Privacy Notice so they know how we will handle their information.

### **Information you ask us to share**

On occasion, you may ask us to share your information with others, such as providing relevant information to a Financial Advisor. In these instances, we ask that you make such a request in writing to Gillian Ward or Suzanne O'Connor, PwC, One Spencer Dock, North Wall Quay, Dublin 1 so that we are authorised to share this information with such third parties.

### **How do we use information about you?**

We use your information, for the purposes outlined below, except as restricted or required by law:

- *To manage the PwC Defined Benefit Retirement Plan:* We use your information to plan, organise and process your pension entitlements in the PwC Defined Benefit Retirement Plan.  
This includes:
  - Administering your pension benefits.
  - Providing you with information about your pension entitlements.
  - Calculating and paying benefits.
  - Providing you with updates on your plan.
  - Contacting you to inform you of any relevant actions you may need to take
- *To comply with laws, regulations, policies and professional rules:* It is essential to our business that we comply with all our legal and professional obligations. This means we will process your information in consideration of legal and other requirements such as those under pension law, Pensions Act, employment law, income tax and national insurance deductions, record-keeping and reporting obligations (including records of working hours and leave entitlements), maintenance of corporate records, conducting audits, compliance with government inspections and other requests from government or other public or regulatory authorities. We use your information, including special categories of information, in this regard, to comply with our legal obligations.
- *To protect the Plan assets:* It will from time to time be necessary to process your information to allow us to protect the assets.
- *Legal process:* We will use your information where it is necessary to establish, raise, preserve, or defend our rights or claims in court, to respond to law

enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, official regulations, or official authorities (including tax and employment), including lawful access by courts or official authorities from outside Ireland.

### **Our legal grounds for processing personal data**

In order to process your personal information, we rely on the following processing conditions:

- Our legitimate interests in managing the PwC Defined Benefit Retirement Plan for its members
- To satisfy any requirement of law, regulation or professional body of which we are a member.

### **How long will we keep information about you?**

We retain your information only for as long as necessary in the context of the relevant purposes described in this Privacy Notice. We may retain it for longer, if that is required or permitted by applicable law or regulation.

Benefits under the PwC Defined Benefit Retirement Plan are based on information which may date back many years and in addition pensions are paid over a long period of time. Thus generally we will retain information relating to you until your membership ceases, or for a longer period if required to do so for legal reasons.

### **How do we secure, transfer and share information about you?**

#### *Security*

We take appropriate measures to protect your information while it is in our care. We have implemented appropriate technical and organizational security measures in order to protect your information from unauthorized or unlawful disclosure, loss, misuse, alteration, destruction damage to such information. In particular:

- We implement and maintain sophisticated technical measures to ensure that your information is recorded and processed in a confidential and secure manner.
- We implement and maintain appropriate restrictions on access to your information.
- All personnel who have access to personal information commit to information privacy and confidentiality requirements.
- We require any business partners and third party service providers that process your information on our behalf, to protect your information with appropriate privacy and security measures.
- We provide information privacy training on a regular basis to personnel who have access to your information.

#### *Transfers*

It can be necessary in the course of business to transfer your information to other PwC firms to ensure PwC's independence obligations are complied with, and to trusted third parties. Such third parties may include providers of IT services, actuarial services, accountancy/auditing services, and Irish Life in relation to PwC's Additional Voluntary Contribution Plan.

Some of these transfers may be to countries outside of the European Economic Area (the “EEA”). Some non EEA countries do not have comparable data protection laws and/or the same level of data protection as in the EEA. We will only transfer your information outside the EEA as permitted by law, including where:

- the recipient is located in a country that the European Commission deems to provide an adequate level of protection for your information; or
- the recipient has agreed to execute an agreement which allows for the lawful transfer of the information outside of the EEA, for example, the Model Clauses.

Where your information is transferred to other PwC firms, such transfers takes place under PwC’s Intra Network Transfer Agreement, which is based on the Model Clauses.

In addition, where your information is transferred outside of the EEA to service providers not within the PwC Network that process your information on our behalf as data processor (third party service providers), we require them to maintain appropriate levels of security and confidentiality with respect to your information and we prohibit them from further using your information without our approval.

#### *Other disclosures required or permitted by law*

We disclose information about you to law enforcement, regulatory and other government agencies and to professional bodies and other third parties, if we are required to do so by, and/or in accordance with, applicable law or regulation. We will review any such requests in the first instance to determine whether disclosure is required or permitted.

#### **Your rights**

You have the following rights in relation to your information, though they are subject to limitation under law:

- To request access to, correction or erasure of your information. When requesting access, you should make a request stating the exact information required. Members are only entitled to access information about themselves and will not be provided with information relating to other members or third parties.
- To object to or request restriction of processing of your information. Where we process your information based on the legitimate interests described above, you can object to the processing in certain circumstances. We will generally stop processing your information unless we have compelling grounds to continue processing, such as where needed for legal reasons.
- To information portability with respect to the information you provided to us, where the information is processed pursuant to your contract with us or your consent. You can choose to receive your information in a common electronic format and request direct transmission to a third party, subject to that third party’s cooperation.
- To withdraw consents given at any time, for example, explicit consent for the processing of special categories of information.

You can exercise the above rights in writing to the PwC Defined Benefit Retirement Plan Trustee Directors, PwC, One Spencer Dock, North Wall Quay, Dublin 1, Ireland

You also have a right to lodge a complaint with the Data Protection Commission (“DPC”), the Irish national supervisory authority. For further information on your rights and how to complain to the DPC, please refer to the DPC website or contact the DPC

using the following details:

Office of the Data Protection

Commission 21 Fitzwilliam

Square South

Dublin 2 D02 RD28

Webform - <https://forms.dataprotection.ie/contact>

### **Changes to this Privacy Notice**

We may amend or update our Notice from time to time, particularly to maintain compliance with evolving information protection laws, regulations, and needs. If we make material changes to our Notice, we will provide you with notice of amendments and update the "Last Updated" date at the top of this Notice.

### **Where do I go for further information?**

If you have questions about this Privacy Notice or how we use your information, please contact:

PwC Defined Benefit Retirement Plan Trustee Directors,

Attn: Gillian Ward/Suzanne O'Connor

PwC,

One Spencer Dock,

North Wall Quay,

Dublin 1,

Ireland.

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