

Privacy Policy

Welcome to our website at www.centric.ie and/or Engage mobile application and / or PensionsVault platform and thank you for your interest in our services and company. We take the protection of your personal data very seriously and process your data in accordance with the Irish Data Protection Act 2018 (“DPA”) and the General Data Protection Regulation (“GDPR”).

With the help of this Privacy Policy, we inform you comprehensively about the processing of your personal data by us and the rights to which you are entitled.

Personal data is information that makes it possible to identify a natural person. This includes, your name, date of birth, address, telephone number, e-mail address, but also your IP address. Anonymous data as such only exists if no personal reference to the user can be made.

The Data Controller

In accordance with the DPA and the GDPR, the person responsible for processing of personal data when using the website is:

Centric Pensions Ltd t/a Centric
Registered in Ireland 681895
51 Bracken Road, Sandyford, Dublin D18

Web: www.centric.ie
Phone: +353 1 872151007
E-Mail: info@centric.ie

Categories of data subjects and types of data processed

During the course of using our website and services, we process the following types of data from visitors and users:

- inventory data (e.g., names, addresses),
- contact data (e.g., e-mail, telephone numbers),
- content data (e.g., text entries, messages),
- usage data (e.g., web pages visited, interest in content, access times), and
- meta/communication data (e.g., device information, IP addresses).

The Engage App financial data

The Engage Application does not access, hold, store or transmit any of your financial data. Links are provided within the application for you to access your pension values, contribution levels etc. These links are external to the Engage application and controlled by your pension provider.

To access any of your financial data you will need to use the secure portal of your pension provider with the login details you have been provided with when you joined the scheme. When accessing the portal of your pension provider via a link from the Engage App you are doing so outside of the App and are subject to the controls, security and terms of that pension provider.

PensionsVault financial data

PensionsVault has the facility for users to upload personal financial data for the purposes of keeping a track of their various pension entitlements. Data is uploaded by the user at their digression and own responsibility. In addition, as a part of our service, detailed in the user terms and conditions, we provide users with a half yearly update of their pension values on the platform. These values are obtained from your pension provider and are securely stored in your personal vault. You can choose to opt out of this information being updated at any time by contacting us in writing with your request.

Purpose of the processing

The Purpose of processing personal data are:

- provision of the online offer, its functions and contents,
- responding to contact requests and communicating with users,
- security measures, and
- reach measurement/marketing.

Relevant legal basis

In accordance with the DPA and the GDPR, the following legal basis, unless specifically described below apply to the processing of your personal data:

- the legal basis for obtaining consent is art. 6(1)(a) and art. 7 GDPR,
- the legal basis for processing in order to fulfil our services and carry out contractual measures and respond to enquiries is art. 6(1)(b) GDPR,
- the legal basis for processing in order to fulfil our legal obligations is art. 6(1)(c) GDPR, and
- the legal basis for processing in order to protect our legitimate interests is art. 6(1)(f) GDPR.

Security of your personal data

We take appropriate technical and organisational measures in accordance with Art. 32 GDPR, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing, as well as the varying likelihood and severity of the risk to the rights and freedoms of natural persons, in order to ensure a level of protection appropriate to the risk.

The measures include, in particular, ensuring the confidentiality, integrity and availability of data by controlling physical access to the data, as well as access to, input, disclosure, ensuring availability and segregation of the data. We also have procedures in place to ensure the exercise of data subjects' rights, deletion of data and response to data compromise. Furthermore, we already take the protection of personal data into account during the development and selection of hardware, software and procedures, in accordance with the principle of data protection through technology design and through data protection-friendly default settings (Art. 25 GDPR).

Cooperation with processors and third parties

If, in the course of our processing, we disclose data to other persons and companies, transmit it to them or otherwise grant them access to the data, this will only be done on the basis of a legal permission (e.g. if a transmission of the data to third parties, such as to payment service providers, is necessary for the performance of the contract, you have consented, a legal obligation provides for this or on the basis of our legitimate interests (e.g. when using agents, web hosts, etc.)). If we commission third parties to process data on the basis of a so-called "order processing agreement", this is done on the basis of Art. 28 GDPR.

Transfers to third countries

If we process data in a third country (i.e. outside the Ireland or the European Economic Area (EEA)) or if this is done in the context of using third-party services or disclosing or transferring data to third parties, this is only done if it is done in order to fulfil our (pre-) contractual obligations, on the basis of your consent, due to a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we only process or allow the processing of data in a third country if the special requirements of Art. 44 ff. GDPR are met. This means, for example, that the processing is carried out on the basis of special guarantees, such as the officially recognised determination of a level of data protection corresponding to that of the Ireland or the European Union or compliance with officially recognised special contractual obligations (so-called "standard contractual clauses").

Your rights

These rights are standardised in both the DPA and GDPR. This includes:

- the right to information (Art. 15 GDPR),
- the right to rectification (Article 16 GDPR),
- the right to erasure (Article 17 GDPR),
- the right to restriction of data processing (Article 18 GDPR),
- the right to data portability (Article 20 GDPR),
- the right to object to data processing (Article 21 GDPR),
- the right to revoke any consent you have given (Art. 7 (3) GDPR), and
- the right to lodge a complaint with the competent supervisory authority (Art. 77 GDPR).

Please contact us at any time with questions and suggestions regarding data protection and to enforce your rights as a data subject.

The Data Protection Commissioner (DPC) is the relevant data protection supervisory authority in Ireland. The DPC is located at Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23, Phone +353 (0761) 104 800 / Email: infor@dataprotection.ie. We would, however, appreciate the chance to deal with your concerns before you approach the DPC.

Cookies

"Cookies" are small files that are stored on your device. Different information can be stored within the cookies. We may use temporary and permanent cookies and will explain this in our Cookie Policy. The legal basis for the use of cookies is either your consent or our legitimate interest.

Deletion of data

The data processed by us will be deleted or its processing restricted in accordance with Articles 17 and 18 GDPR. Unless expressly stated in this data protection declaration, the data stored by us will be deleted as soon as it is no longer required for its intended purpose and the deletion does not conflict with any statutory retention obligations. If the data is not deleted because it is required for other and legally permissible purposes, its processing will be restricted. I.e., the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for reasons of commercial or tax law.

Business-related processing

In addition, we process:

- Contract data (e.g., subject matter of the contract, term, category of customer), and
- Payment data (e.g., bank details, payment history).

of our customers, prospective customers for the purpose of providing contractual services, service and customer care, marketing, advertising, and market research.

Contractual services

We process the data of our customers within the scope of our contractual services. In doing so, we process:

- inventory data (e.g., customer master data, such as names or addresses), contact data (e.g., e-mail, telephone numbers),
- content data (e.g., text entries, testimonials and messages),
- contract data (e.g., subject matter of contract, term),
- payment data (e.g., bank details, payment history),
- usage data and metadata (e.g., in the context of evaluating and measuring the success of marketing measures).

As a matter of principle, we do not process special categories of personal data, unless these are components of commissioned processing. The purpose of the processing is the provision of contractual services, billing, and our customer service. We process data that is necessary for the justification and fulfilment of contractual services and point out the necessity of their disclosure. Disclosure to external parties only takes place if it is necessary in the context of the service.

When processing the data provided to us within the scope of providing our services, we act in accordance with the instructions of the client as well as the legal requirements of order processing pursuant to Art. 28 GDPR and do not process the data for any other purposes than those specified in the services.

We delete the data after the expiry of statutory warranty and comparable obligations. The necessity of storing the data is reviewed every three years; in the case of statutory archiving obligations, the deletion takes place after their expiry (6 years).

In the case of data disclosed to us by the user within the scope of a services, we delete the data in accordance with the specifications of the services, in principle after the end of the services.

Use of PensionsVault and Engage applications

Once registered with our applications, you are entitled to maintain use of the service as long as you are a client of the nominated adviser on the account. This applies when you are:

- an active member of the current pension scheme,
- a deferred or past member of the current pension scheme, having left service from the employer that set up your scheme, or
- a member of a Master Trust where your current scheme is transferred under pensions legislation to a nominated Master Trust

Administration, financial accounting, office organisation, contact management

We process data within the scope of administrative tasks as well as organisation of our business, financial accounting, and compliance with legal obligations, such as archiving.

In doing so, we process the same data that we process in the context of providing our contractual services. The purpose and our interest in the processing lies in the administration, financial accounting, office organisation, archiving of data, i.e., tasks that serve the maintenance of our business activities, performance of our tasks and provision of our services.

The deletion of data with regard to contractual services and contractual communication corresponds to the information mentioned in these processing activities.

In this context, we disclose or transmit data to the tax authorities, consultants such as tax advisors or auditors as well as other fee offices and payment service providers.

Furthermore, we store information on suppliers, organisers, and other business partners on the basis of our business interests, e.g., for the purpose of contacting them at a later date. This data, most of which is company-related, is stored permanently.

Contact

When contacting us (e.g., via e-mail, phone or social media), the user's details are processed for the purpose of handling the request and its processing. The user's details may be stored in a customer relationship management system or comparable enquiry organisation. We delete the enquiries if they are no longer necessary. We review the necessity every two years; furthermore, the legal archiving obligations apply.

Data storage

No financial data is collected nor stored on your smartphone device in your Engage App. Personal data is encrypted and held in a secure cloud-based web centre within the EU. The web centre is owned and operated by Amazon as a part of their AWS (Amazon Web Services), which maintain the highest storage security controls available. Access to this facility is only available in encrypted format from our IT provider, Square Root Solutions. No personal data is held outside the EEA.

Subscribers to the PensionsVault platform have their own secure account where their personal data is stored. Users can request a copy of this at any stage and/or request to have all data records deleted. Requests should be made in writing to Centric Pension Ltd. Personal data for the PensionsVault platform is encrypted and held in a secure cloud-based web centre within the EU. The web centre is owned and operated by Amazon as a part of their AWS (Amazon Web Services), which maintain the highest storage security controls available. Access to this facility is only available in encrypted format from our IT provider, Square Root Solutions/Imperiot IT Software. No personal data is held outside the EEA.

Hosting

The hosting services used by us for the purpose of operating this website is Amazon Web Services (AWS) located at One Burlington Plaza, Burlington Road, Dublin 4, Ireland. In doing so Amazon Web Services (AWS), process inventory data, contact data, content data, contract data, usage data, meta data and communication data of customers, interested parties and visitors of our website on the basis of our legitimate interests in an efficient and secure provision of the website in conjunction with the provision of contractual services and the conclusion of the contract for our services, including but not limited to our services).

Collection of access data and log files

We, or rather Amazon Web Services (AWS), collect data on every access to our website on the basis of our legitimate interest. The access data includes the name of the website accessed, file, date and time of access, amount of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider.

Log file information is stored for security reasons (e.g., for the clarification of abuse or fraud) for a maximum of 7 days and then deleted. Data whose further storage is necessary for evidentiary purposes is exempt from deletion until the respective incident is finally clarified.

Data Breaches/Notification

Databases or data sets that include Personal Data may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, we will notify all affected individuals whose Personal Data may have been compromised, and the notice will be accompanied by a description of action being taken to reconcile any damage as a result of the data breach. Notices will be provided as expeditiously as possible after which the breach was discovered.

Children's Privacy

Our services are restricted to users who are 18 years of age or older. We do not knowingly collect personal data from anyone under the age of 18. If you suspect that a user is under the age of 18, please contact us.

Changes

Because we're always looking for new and innovative ways to improve our website and services, this policy may change over time. We will notify you before any material changes take effect so that you have time to review the changes.