

Privacy Notice

Engage Smartphone Application

Introduction

This document refers to the smartphone application Engage which is provided by Centric Pensions Ltd (t/a Centric) and how user's data is protected through the use of this application.

For the purposes of this document personal data has the meaning of any information concerning or relating to a living person who is either identified or identifiable (such a person is referred to as a 'data subject').

An individual could be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier (such as an IP address) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

Personal Data

Centric Pensions Ltd does not collect any financial data from advisers, scheme members or pension providers. Basic personal collected is collected from scheme members during registration process to provide access to the Engage Application. Centric act in the capacity of a data processor. Centric has conducted a completed GDPR risk analysis process review ensuring all necessary controls are in place to maintain complete and comprehensive GDPR compliance.

Limited personal data may also be collected from advisers in their registration process relation to contact details. Controls are in place to ensure secure storage of this information and on no occasions is this data ever transmitted or copied.

The Centric website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. The host of Centric's website is Wix.com.

Wix.com uses cookies to help Centric identify and track visitors and their website access preferences. Centric website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the centric website.

Centric will only collect information needed so that it can provide you with the necessary credentials to access the website and in order to contact you about updates to the services we provide.

The followings sets out the basis for data collection under GDPR guidelines

Legal basis for processing any personal data

To provide Centric' service to members when they register. Members download the App, opting to register and agreeing to its terms provides the legal basis for collecting this information.

Legitimate interests pursued by Centric

To promote the services offered by Centric and/or to market the services and/or products.

Consent

In registering for the Engage Application members are consenting to the terms set out in this Privacy Notice and Terms of Use. For advisers, when registering with Centric you are agreeing to the terms set out in this Privacy Notice. You can withdraw consent at any time by emailing info@centric.ie or writing to us, see last section for full contact details.

Disclosure

Centric does not pass any personal information to any party. Advisers with access to the Platform are the nominated advisers of specific schemes. Advisers will never have access to schemes to which they are not the appointed adviser.

Advisers have the facility to send push notification and upload documents within the Platform. This transmission is being send within the Centric portal and the advisers have no sight or access to personal contact details, only the content being transmitted.

Retention Policy

Centric will process personal data during the duration of any contract and will continue to store only the personal data needed for five years after the contract has expired to meet any legal obligations. After five years any personal data not needed will be deleted.

Data storage

Data is encrypted and held in a secure cloud-based web centre in France. 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. Centric does not store personal data locally on servers or any personal devices. No personal data is held outside the EEA.

Member rights as a data subject:

At any point whilst Centric is in possession of or processing personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Centric refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

Centric at your request can confirm what information it holds about you and how it is processed.

You can request the following information:

1. Identity and the contact details of the person or organisation Centric that has determined how and why to process your data.
2. Contact details of the data protection officer, where applicable.
3. The purpose of the processing as well as the legal basis for processing.
4. The categories of personal data collected, stored and processed.
5. Recipient(s) or categories of recipients that the data is/will be disclosed to.
6. How long the data will be stored.

7. Details of your rights to correct, erase, restrict or object to such processing.
8. Information about your right to withdraw consent at any time.
9. How to lodge a complaint with the supervisory authority (Data Protection Regulator).

To access what personal data is held, identification will be required

Please contact us for the document requirements that we will need to receive in order to process a data release request.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Centric, you have the right to complain to Centric.

If you do not get a response within 30 days or you are not fully satisfied with the response you can complain to the Data Protection Regulator.

The details for each of these contacts are:

Centric	Data Protection Commissioner:
51 Bracken Road Sandyford D18CV48 Telephone +353 1 872151007 or email infoi@centric.ie	Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23, Phone +353 (0761) 104 800 Email: infor@dataprotection.ie