

General Investment Trust – Summary Data Privacy Notice

May 2018

1. Introduction

At General Investment Trust (GIT), we take your privacy seriously. It's important that you know exactly what we do with personal information that you and others provide to us, why we gather it and what it means to you. This summary explains the most important aspects of how we use your information and what rights you have under the General Data Protection Regulation (**GDPR**). Our full Data Privacy Notice sets out in more detail how we use personal information. You can view this on our website www.git.ie.

We are committed to:

- Protecting you and your information
- Giving you control
- Being transparent
- Creating value for you.

Please take time to read this notice carefully. If you have any questions about how we use your information, please contact us using the information provided below.

2. Who we are

General Investment Trust DAC ("GIT") is a company specialising in the provision of trustee services to employers and members since 1953. GIT is a wholly owned subsidiary of New Ireland Assurance Company plc (New Ireland Assurance) and a member of the Bank of Ireland Group. Your information is gathered, stored, shared and used by GIT.

3. The information we collect about you

We gather data to identify you, including your contact information, your financial details/financial circumstances, your occupation/employment, your marital status, your health and/or your financial associations, information about you provided by others, information which you have consented to us using and other personal information, such as; telephone recordings, CCTV images from our offices and information in relation to data access, correction, restriction, deletion, porting request and complaints. Sometimes we may use your information even though you are not our customer. For example, you may be a beneficiary, a representative of our customer or applying for one of our services.

4. When we collect your information

We collect information you give us, information from your use of our service and information provided by third parties.

5. How we use your information

We will use and share your data where:

- Its use is necessary to provide our services to you and perform our contract with you, including paying a claim;
- Its use is necessary for us to comply with a legal or regulatory obligation;
- Its use is necessary to protect your “vital interests” in exceptional circumstances;
- Its use is in accordance with our legitimate interests subject to us not over-riding your interests or fundamental rights and freedoms.

6. How we use automated processing.

We use automated processing to comply with our legal obligations in connection with prevention of money laundering, fraud and terrorist financing.

7. Who we share your information with

When providing our services to you, we share your information with:

- Your authorised representatives
- Third parties (with whom we need to share your information to facilitate payments you have requested, or those you ask us to share your information with)
- Bank of Ireland Group companies to enable us better manage our business
- Service providers who provide us with support services
- Statutory and Regulatory bodies such as the Pensions Authority and Ombudsman
- Third parties in connection with a sale or purchase of assets by a member of our Group
- Persons making an enquiry or complaint
- Courts and court appointed persons/entities
- Debt collection agencies, budgeting and advice agencies, tracing agencies, receivers, liquidators, examiners, official Assignee for Bankruptcy and equivalent in other jurisdictions
- Business partners, auditors and joint ventures
- Trade associations and professional bodies, non-statutory bodies
- Business associates and other advisers

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- Employers
 - Trade Unions
 - Other Trustees
 - Pension fund administrators, registered administrators
 - Police forces and security organisations
 - Insurance companies, re-insurers, insurance intermediaries
 - Healthcare professionals and medical consultants

8. How long we hold your information

As a general rule, we keep your information for a specified period of time from the date of when your contract ceases and/or you cease to be a customer. Typically this period is 7 years, however it may be held for a longer or shorter period depending on a number of factors, including:

- the type of data,
- the purpose for which it was collected,
- regulatory rules, and
- the type of service we have provided.

9. Implications of not providing information

If you do not provide information we will not be able to:

- Assess eligibility for a financial product or service
- Provide the requested services to you
- Continue to provide and/or renew services to you.

10. Where your information is stored

GIT operates in the Republic of Ireland. However, sometimes the information that we collect from you and/ or collected on our behalf may be viewed from, transferred to or stored, outside the European Economic Area (EEA). This may apply to GIT or to a third party e.g. a pension administrator appointed to administer the pension and /or life assurance scheme that you are a member of. We ensure that we put in place appropriate safeguards when we allow your information to be processed outside the EEA – either by GIT or by a Data Processor acting on our behalf.

11. How to exercise your information rights and the right to object

You have several rights in relation to how we use your information, including the right, without undue delay, to:

- Find out if we use your information, access your information and receive copies
- Have inaccurate/incomplete information corrected and updated
- Object to particular uses of your personal data for our legitimate business interests
- In certain circumstances, to have your data deleted or our use of your data restricted
- In certain circumstances, a right not to be subject to solely automated decisions and where we make such automated decisions, a right to have a person review the decision
- Exercise the right to data portability
- Withdraw consent at any time where processing is based on consent.

If you wish to exercise any of your data rights, contact us at the details set out below. If you make your request electronically, we will try to provide you with the relevant information electronically.

You also have the right to complain to the Data Protection Commission or another supervisory authority. Contact the Office of the Data Protection Commission at:

Postal Address

Data Protection Commission
Canal House
Station Road
Portarlinton
R32 AP23 Co. Laois

Telephone +353 (0)761 104 800
Lo Call Number 1890 252 231
Fax +353 57 868 4757
E-mail info@dataprotection.ie

12. How to contact us

If you have questions about how we use your information or wish to exercise your information rights, please contact us at;

General Investment Trust DAC (GIT)

3-4 Frederick Street

Dublin 2

Phone +353 (1) 617 2885 | Email info@git.ie

13. Updates

We will update our Summary Data Privacy Notice from time to time. Any changes will be made available on our website and, where appropriate, notified to you by e-mail.

