

# **General Investment Trust – Data Privacy Notice (DPN)**

October 2024



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## 1. Introduction

General Investment Trust DAC (GIT) provides professional trustee services for the Navigator Master Trust. GIT's role is to act impartially in safeguarding the interests of all the members of the Navigator Master Trust to which it acts as trustee.

GIT is a wholly owned subsidiary of New Ireland Assurance Company plc and is member of the Bank of Ireland Group.

At GIT, we take your privacy seriously.

We are committed to

- Protecting you and your information – The security of your personal information comes first. Security features are built into our services and infrastructure, and we continually invest in these to protect you.
- Giving you control – We want you to have full control of your personal data. We will never abuse any information you permit us to use, nor will we inundate you with irrelevant promotional messaging. We will only use your data to improve the experience you have with our everyday services, or, where you have expressly consented, talk to you about new services we believe offer value to you or your business. We will never provide your information to other companies for marketing purposes without your express permission.
- Being transparent – We want you to understand what we do with your information, why we do it and what it means to you. By being transparent, we hope to build on the trust you already have in us. We want to make our customers' lives better, and to be able to bring you a service that is of benefit to you.
- Creating value for you – The information you provide about yourself has value. With your explicit consent, we will selectively use your information to bring you services we believe are of genuine relevance and interest to you. This Data Privacy Notice (Notice) is an important document. Please read it carefully. If you would like a printed copy, please contact us and we will send you a copy.

This Notice applies to our professional trustee services. We will also provide you with additional information specific to a particular service if we use your personal data in a different way.

You have significant rights in relation to the processing of your personal data, including the right to object to the processing of your personal data where that processing is carried out for our legitimate interests.

We are committed to managing your personal data only in a manner that complies with applicable legislation. If you want to know more about how we gather, store, share or use your personal data, or if you want to make changes to the personal data that we store on your behalf, please contact us.

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## 2. Who we are

Throughout this Notice, “we”, “us”, “our” and “ours” refer to **General Investment Trust DAC** (GIT).

Registered Office: 2 College Green, The Atrium Dublin 2, D02VR66.

Registered Number: 14852.

**“New Ireland”** means: New Ireland Assurance Company plc which also trades under the name and style of Bank of Ireland Life

Registered Office: 87-89 Pembroke Road, Ballsbridge, Dublin 4, D04X738.

Registered Number: 7336.

Frequently used trading names of New Ireland Assurance Company plc include “New Ireland”, “New Ireland Assurance” and “Bank of Ireland Life”.

**“Bank of Ireland Group”** means: all members of the Bank of Ireland Group whose holding company is Bank of Ireland Group plc which is incorporated in Ireland with Limited Liability

Registered Office: 2 College Green, Dublin, D02 VR66.

Registered Number: 593672.

Members of the Bank of Ireland Group (the “Group”) include: Bank of Ireland, Bank of Ireland Mortgage Bank, Bank of Ireland Insurance Services Limited and Bank of Ireland Life, which is a trading name of New Ireland Assurance Company plc. Your product or service terms and conditions will specify which member(s) of the Bank of Ireland Group is providing the relevant product or service.

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### 3. The information we collect about you

Gathering and processing your personal data allows us to look after and to service the Navigator Master Trust. Legislation and various codes of conduct require us to gather information from and about you. For example, we gather documentation to prove your identity and validate your address to comply with anti-money laundering legislation. We use this information to create a better understanding of all our customers, and to help us to meet changing needs. Having this information also allows us, where you have provided us with your explicit consent to do so, to update you about new offers or services that might be of interest.

The information we collect falls into **various categories**.

- **Identity & contact information**

Name, date of birth, copies of ID, contact details, PPS number, online user identities (such as your Twitter handle, Facebook profile, internet protocol address, cookie identifiers and radio frequency tags), security details to protect identity, nationality, home status and address, email address, work and personal phone numbers, marital status, family details, tax residency and tax related information.

- **Financial details/circumstances**

Bank account details, credit/debit card details, income details, application processing and administration records, your employment status, occupation and employment details of your partner, life assurance and pension details, transaction details, treasury transactions, financial needs/attitudes, contact outcomes, authorised signatories details, information relating to power of attorney arrangements and information relating to pension adjustment orders.

- **Information about you provided by others**

If you give us information about someone else, or someone gives us information about you, we can add it to any personal information we already hold and we will use it in the ways described in this Notice.

- **Health and Medical information**

Where you are a member of the Navigator Master Trust and you wish to avail of relevant benefits from the scheme. This information is requested so that we can provide you with your relevant benefits. We also use this information to assess and pay a claim. We do not request information relating to any criminal convictions or offences, however if disclosed by you in the course of a health assessment this information may be used in the context of your health and medical data, to make a claim decision.

- **Information which you have consented to us using**

- › Where you have explicitly consented, we and other third parties will use your information for marketing purposes.
- › Information from online activities.
- › We collect information about your internet activity using technology known as cookies, which can be controlled through internet browsers. Details of how and why we use cookies are provided in the Cookies section of our website.

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- › Your internet browser settings or otherwise Internet Protocol (IP) and other relevant information to help us identify your geographic location when providing you with our services.
  - **Other personal information including;**
    - › Telephone and image recordings ( for example to allow us to carry out anti-money laundering checks, to allow you give us instructions by phone, to analyse, assess and improve our services to our customers and for training and quality purposes).
    - › CCTV images and facial recognition at our offices (but only for security reasons and to help prevent fraud or crime).
    - › Information in relation to data access, correction, restriction, deletion, porting request and complaints.

#### Sometimes we collect and use your information even though you are not a customer of ours

For example you may be an existing or prospective beneficiary or representative of one of our customers. If so, we will apply the principles outlined in this Notice when we are dealing with your information.

## **4. When and how we collect information about you**

We collect information you give us, information from your use of our services and information we get from third parties.

### **We collect information about you:**

- When you ask us to provide you with services.
- When you use our website and online services provided by us (including mobile applications) and visit our offices.
- When you or others give us information verbally or in writing, or if you make a complaint. This information can be on application forms, in records of your transactions with us and/or if you make a complaint.
- When you use our services, including making transactions on your policy, we gather details about how you pay money, how much the payments are for and when the payments are made.
- From information publicly available about you. For example, in trade directories, online forums, websites or social media. This information may assist us in processing claims.
- From your online activities with third parties where you have given us your consent. For example, by consenting to our use of certain cookies or other location tracking technologies.
- From fraud prevention agencies or public agencies such as the Companies Registration Office or judgement registries.

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## 5. How we use your information

We use your information:

**To provide our products and services to you and perform our contract with you, or in respect of you.**

We use your information, including where relevant special category data e.g. data relating to your health, to:

- Establish your eligibility and acceptance for our services.
- Manage and administer your accounts, policies and benefits that we provide you.
- Process your application.
- Process payments that are paid to you or by you. For example, if you pay by direct debit, we will share transaction details with your payment service provider (for example, Bank of Ireland, etc.).
- Contact you by post, phone, text message, email, social media, fax or other means but not in a way contrary to your instructions to us or contrary to law.
- Monitor and record our conversations when we speak on the telephone.
- Share information with Insurance intermediaries, Insurance Companies, your Employer.
- Recover debts you have with us.
- Manage and respond to a complaint or appeal.

**When you apply to us for membership and benefits and/or make a claim**

- We will pass your details to the insurance company, intermediary, reinsurer, medical professional and/or claims agent.
- We can request information relating to your health for underwriting and claims administration purposes. This information can be obtained by, or shared with, medical screening companies and claims handlers, as well as medical professionals, insurance companies and your employer.
- We disclose your information within our Group of companies, to our agents and other insurers and third parties for administration, regulatory, customer care and service purposes and to investigate or prevent fraud.

**To manage our business for our legitimate interests, subject to us not over-riding your interests or fundamental rights and freedoms.**

To manage our business we use your information to:

- Carry out credit management activities, including collecting and enforcing debts and arrears, which can involve engaging agencies to trace you (for example, where the address you have provided is no longer accurate and we need to provide you with legal documentation).
- Provide service information, to improve our service quality and for training purposes.



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- Conduct marketing activities, including running competitions and promotions research, analytics and related activities where you have consented to such use.
  - Gather your information to assess the quality of service we provide you.
  - Risk management, strategic planning and business portfolio management.
  - Carry out long-term statistical modelling, provided that such modelling does not directly affect any decision we make about you.
  - Compile and process your information for audit, statistical or research purposes (including, in particular instances, making your data anonymous) to help us understand trends in our customer behaviour and to understand our risks better, including for providing management information, operational and data risk management.
  - Test and maintain our systems.
  - Financially assess the performance of the business in line with reporting requirements and internal business assessment metrics.
  - Assist in compliance with our legal obligations in connection with the prevention of money laundering and terrorist financing. For example, to screen for suspicious transactions.
  - Protect our business, reputation, resources and equipment, manage network and information security (for example, developing, testing and auditing our websites and other systems, dealing with accidental events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data, and the security of the related services), and prevent and detect fraud, dishonesty and other crimes (for example, to prevent someone trying to steal your identity). We also use CCTV at our premises.
  - Manage and administer our own and the Group's legal and compliance affairs, including complying with regulatory guidance and mandatory or voluntary codes of practice to which we have committed.
  - Enable us and Group members to share or access your information for internal administrative purposes, audit, prudential, statistical or research purposes (including making your data anonymous) to help us understand trends in customer behaviour, for helping us to understand our risks better and for the purposes set out in this Notice (but not for the purposes of marketing where you have not consented to this).
  - Assist our Group to buy or sell assets. Members of the Bank of Ireland Group may in the future wish to sell, transfer or merge part or all of its business or assets or to buy a new business or the assets of another business or enter into a merger with another business. If so, we may disclose your personal information under strict duties of confidentiality to a potential buyer, transferee, merger partner or seller and their advisers, so long as they agree to keep it confidential and to use it only to consider the transaction. If the transaction goes ahead, the buyers, transferee or merger partner can use or disclose your personal information in the same way as set out in this Notice.
  - To facilitate potential or actual transfers of a product provided to you or in connection with a securitisation.
  - To transmit your details within the Group and to third parties for internal administrative purposes, including the processing of your personal data, subject to having appropriate safeguards, including contractual provisions, in place.

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## To comply with our legal and regulatory obligations

We need to use your information to comply with legal obligations including:

- Complying with your data rights.
- Providing you with statutory and regulatory information and statements.
- Establishing your identity, residence and tax status in order to comply with law and regulation concerning taxation and the prevention of money laundering, fraud and terrorist financing.
- We are required by law to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities. As a result, we need to disclose information to government and other statutory bodies.
- Preparing returns to regulators and relevant authorities, including preparing income tax, capital gains tax, capital acquisition tax and other Revenue returns.
- Reporting to and, where relevant, conducting searches on industry registers.
- Complying with binding requests from regulatory bodies including the Central Bank of Ireland, Pensions Authority.
- Complying with binding production orders or search warrants, orders relating to requests for mutual legal assistance in criminal matters received from foreign law enforcement agencies/ prosecutors.
- For other reasons where a statutory basis exists we do so, including use of your Personal Public Service (PPS) number.
- Complying with court orders arising in civil or criminal proceedings.

## Where you have given us consent (which you can withdraw at any time)

Where you have given us your consent including explicit consent (which you can withdraw at any time) we can:

- Send electronic messages to you about product and service offers from our Group.
- Share your data with third parties for electronic messaging purposes.
- Use cookies.
- Use your data for marketing purposes.
- Use your data to facilitate solely automated decisions that have a legal or similarly significant effect (for example, to approve or reject an application for a policy).
- In circumstances where you purchase your policy/product through the Bank of Ireland Group share your personal data with the Bank of Ireland Group to form a single view of your entire relationship with the Group. This will enable us to better manage and develop our relationship and provide you with the best possible customer experience.

**Note:** Withdrawal of your consent will not affect the lawfulness of any processing carried out while it was in place.

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## 6. Who do we share information with?

There are a number of individuals and companies with whom **we share your information**, but only as necessary and in accordance with applicable Data Protection rules.

We can share your information with:

- Your authorised representatives, including your employer, broker/retail intermediary, attorney and any other party authorised by you to receive your personal data.
- Companies in the Bank of Ireland Group, including New Ireland in order to enable us to better manage our business e.g. to provide us with combat money laundering services etc.
- Service providers who provide us support services. These include investment companies, IT and telecommunication service providers, software development contractors, data processors, computer maintenance contractors, printing companies, property contractors, document storage and destruction companies, archiving services suppliers, debt collection and tracing agencies, reinsurance companies, medical professionals, claims handlers, consultants and advisors including legal advisors and third party administrators.
- Third parties with whom we share your information at your request, such as your employer, other life assurance companies and pension providers.
- Statutory and regulatory bodies. These include the courts and those appointed by the courts, government departments, statutory and regulatory bodies in all jurisdictions where GIT and/or New Ireland operates including: the Central Bank of Ireland, the Data Protection Commission, Financial Services and Pensions Ombudsman, Pensions Authority, An Garda Síochána/police authorities/enforcement agencies, Revenue Commissioners, Criminal Assets Bureau, US, EU and other designated authorities in connection with combating financial and other serious crime.
- Third parties in connection with a sale or purchase of assets by a member of our Group. For example parties who are interested in or participating in buying or selling, (including by way of a loan assignment/transfer and securitisation scheme, collateralisation scheme or any other funding arrangement).
- Payment facilitators and other financial institutions, such as SWIFT, MoneyGram, banks and building societies.
- Courts and court-appointed persons/entities.
- Receivers, liquidators, examiners, official Assignee for Bankruptcy and equivalent in other jurisdictions, debt collection agencies, budgeting and advice agencies and tracing agencies.
- Business associates and other advisers.
- Employers.
- Pension fund administrators and pensions trustees.
- Police forces and security organisations, ombudsmen and regulatory authorities, as well as fraud-prevention agencies.
- Insurers/re-insurers and insurance intermediaries.
- Healthcare professionals and medical consultants.
- Auditors
- Business partners and joint ventures – we, our business partners or joint ventures will tell you about any such sharing of your information.

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## 7. How long we hold your information

The length of time we hold your data depends on a **number of factors**, such as **regulatory rules and the type of financial service we have provided to you**.

Those factors include:

- The regulatory rules set by authorities like the Central Bank of Ireland and the Data Protection Commission, etc.
- Any statutory obligations we are subject to, including the Pensions Act 1990.
- The type of financial service we have provided to you.
- Whether you and us are in a legal or other type of dispute with another person or each other.
- The type of data we hold about you.
- Whether you or a regulatory authority asks us to keep it for a valid reason.
- Whether we use your data for long term statistical modelling, provided that such modelling does not affect any decision we make about you.

As a general rule, we keep your information for a specified period of time from the date of when the relevant section of the Navigator Master Trust ceases, or, we cease to be trustee. 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.

## 8. Implications of not providing information

We need your information in order to:

- Provide our services to you
- Fulfil our contract with you
- Comply with our legal obligations
- Manage our business for our legitimate interests

Of course, you can choose not to share your information, but doing so will limit the services we are able to provide to you, or in respect of you.

- We will not be able to provide you with certain services that you request
- We will not be able to continue to provide you with services
- We will not be able to assess your eligibility for a service

When we request information, we will tell you if providing it is a contractual requirement or not, and whether or not we need it to comply with our legal obligations.

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## 9. Where your information is stored

Your information is stored on systems within GIT, New Ireland's and the Group's premises and with providers of information storage (including cloud storage providers). We transfer information about you and your products and services with us to our service providers and other organisations, a number of which are outside the European Economic Area (EEA), but only if they agree to act solely on our instructions and protect your information to the same standard that applies in the EEA.

For example, we process payments using third parties (including other financial institutions such as banks and worldwide payments systems) if, for example, we make a foreign payment to you. Those external organisations will process and store your personal information abroad and can have to disclose it to foreign authorities to help them in their fight against crime and terrorism.

### **How we use companies to process your information outside the European Economic Area (EEA).**

A number of our service providers, for example IT, telecommunication, payment processors, reinsurers, tracing agents and contractors are based outside of the EEA. Where we authorise the processing/transfer of your personal information outside of the EEA we require your personal information to be protected to at least Irish standards.

## 10. The legal basis for using your information

We will use your data and share that data where:

- Its use is necessary in relation to a service or a contract that you have entered into or because you have asked for something to be done so you can enter into a contract with us.
- Its use is necessary because of a legal obligation that applies to us (except an obligation imposed by a contract). An example of this would be us sharing your information with the Revenue Commissioners in the case of a pension or life assurance policy.
- You have consented or explicitly consented to the using of your data in a specific way.
- Its use is necessary to protect your "vital interests". This will only arise in exceptional circumstances where we will use and/or disclose information about you to identify, locate and protect you, for example, if it comes to our attention that you are in imminent physical danger and this information is requested by An Garda Síochána or your relative.
- Its use is in accordance with our legitimate interests e.g. to manage our business, subject to those interests not over-riding your fundamental rights and freedoms.
- The processing is necessary and proportionate for the purposes of your membership of the Navigator Master Trust.

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## 11. How to exercise your information rights including the right to object

Providing and holding personal information comes with significant rights on your part and significant obligations on ours.

You have **several rights** in relation to how we use your information.

- Find out if we use your information, to access your information and to receive copies of the information we have about you.
- Request that inaccurate information is corrected and incomplete information updated.
- Object to particular uses of your personal data for our legitimate business interests. However, doing so will have an impact on the services we can / are willing to provide.
- Object to use of your personal data for direct marketing purposes. If you object to this use we will stop using your data for direct marketing purposes.
- Have your data deleted or its use restricted – you have a right to this under certain circumstances. For example, where you withdraw consent you gave us previously and there is no other legal basis for us to retain it, or where you object to our use of your personal information for particular legitimate business interests.
- Transfer your information to another provider, known as the right to data portability.
- Withdraw consent at any time, where any processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on consent before its withdrawal.

We will endeavour to respond to your request as soon as we can. If we are unable to deal with your request fully within a month, due to the complexity or number of requests, we may extend this period by a further two months. Should this be necessary, we will explain the reasons why.

**Note:** If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise.

You also have the right to complain to the Data Protection Commission or another supervisory authority.

## 12. How to update your information

It is important that the information we hold about you is accurate and up to date. Please let us know if your information changes or the information we hold about you is incorrect. You can ask us to update or correct your information using the contact details below.

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### 13. Changes to this Notice

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

### 14. How to contact us and/or the Data Protection Commission

You have the right to complain to the Data Protection Commission or another supervisory authority. You can find details of how to contact the Data Protection Commission below and on their website [www.dataprotection.ie](http://www.dataprotection.ie).

**Fax:** +353 57 868 4757

**E-mail:** [info@dataprotection.ie](mailto:info@dataprotection.ie)

**Postal Address:** Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28

#### How to contact us

If you have questions about how your information is gathered, stored, shared or used, or if you wish to exercise any of your data rights, please contact us at:

General Investment Trust DAC (GIT)

2 College Green, The Atrium,

Dublin 2, D02 VR66

**Phone** +353 (1) 617 2885 | **Email** [info@git.ie](mailto:info@git.ie)

To facilitate providing an accurate response, please provide as much detail as possible on your request, including, if applicable, the relevant policy numbers, the documentation you require, and/or the relevant period of time.

