



Privacy Notice – Aon Employee Benefits

1. Introduction

Aon is committed to protecting your privacy. This Privacy Notice explains how Aon uses and protects the information we collect. It applies to any personal information you provide to Aon and, subject to local law, any personal information we collect from other sources.

“**Services**” means insurance intermediary, investment, risk management, analytical, consultancy, advisory and/or other services that Aon may agree in writing to provide to you from time to time including, by way of engagement letter or statement of work;

Throughout this Notice, "Aon" refers to Beech Hill Pension Trustees Limited trading as Aon Employee Benefits, including its subsidiaries Becketts Ltd trading as Aon Employee Benefits & Private Client Trustees Ltd trading as Aon Professional Trustees (also referred to as "we", "us", or "our").

2. Collecting Your Information

2.1 The information we collect about you may include the following:

- a) basic personal details, such as your name, address, contact details, date of birth, age, gender and marital status;
- b) demographic details, such as information about your lifestyle; Personal Public Service Number; and insurance requirements, including details of your personal public service Number, salary, occupational details and health details.
- c) financial details, savings/pension & investment holdings, income and expenditure details, bank account information and details of your credit history and bankruptcy status; and
- d) claims details such as information about any claims concerning your insurance sought; and
- e) information relating to notified/submitted claims/incidents where we provide claims services;
- f) your marketing preferences

2.2 You are required to provide any personal information that we reasonably require to meet our obligations in connection with the Service provided to you, including any legal and regulatory obligations. Where you refuse to provide information that we reasonably require to fulfil these obligations, we may not be able to offer the Service to you and/or we may terminate the Service provided to you with immediate effect.

2.3 Where you provide personal information to Aon about third party individuals (e.g. information about your spouse, civil partner, child(ren), dependants or emergency contacts), where appropriate, you should provide these individuals with a copy of this Privacy Notice beforehand or ensure they are otherwise made aware of how his/her/its information will be used by Aon.

2.4 In addition to sourcing personal information from you directly, we may also collect personal information about you from other third parties, such as, insurance underwriters, solicitors, accountants, financial institutions, vetting and data validation agencies and other professional advisory service providers. This information may be sourced prior to and during the course of providing the Service to you. Further information concerning such third parties can be found below in section 6 of this Privacy Notice.

3. Processing Your Information

We will use the information we collect about you in connection with the Service to:

- a. assess your application to receive the Service;
- b. offer, administer and manage the Service provided to you;
- c. investigate and settle claims or complaints in relation to insurance policies and/or the Service provided;
- d. facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders;
- e. trace debtors and recover any outstanding debt in connection with the Service provided;
- f. fulfil legal and regulatory obligations and monitor compliance with the same;
- g. conduct market research and canvass your views about the Service in order to develop and improve our products and service offerings generally; and
- h. offer other products and services that may be of interest to you.



4. Legal Grounds for Processing

Aon relies on the following legal grounds to collect and use your personal information:

- a. Performance of the Service contract: Where we offer the Service or enter into a contract with you to provide the Service, we will collect and use your personal information where necessary to enable us to take steps to offer you the Service, process your acceptance of the offer and fulfil our obligations in the contract with you.
- b. Legal and regulatory obligations: The collection and use of some aspects of your personal information is necessary to enable us to meet our legal and regulatory obligations. For example, Aon is registered as an insurance intermediary under the European Communities (Insurance Mediation) Regulations 2005 (as amended) and is regulated by the Central Bank of Ireland (“Central Bank”). Aon’s insurance intermediary reference number with the Central Bank is C1298. Aon is subject to the Codes of business conduct including the Consumer Protection Code, the Minimum Competency Code and Fitness & Probity Standards. These codes offer protection to consumers and can be found on the Central Bank’s website www.centralbank.ie.
- c. Legitimate interests: The collection and use of some aspects of your personal information is necessary to enable us to pursue our legitimate commercial interests, e.g. to operate our business, particularly where we offer other products and services that may be of interest to you or to conduct market research to improve our products and services generally. Where we rely on this legal basis to collect and use your personal information we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under applicable data privacy law.
- d. Consent: We rely on your consent to collect and use your sensitive personal information, particularly information concerning health information where you provide this in connection with a claim against your insurance policy. Where we rely on your consent to collect and use your information, you are not obliged to provide your consent and you may choose to subsequently withdraw your consent at any stage once provided. However, where you refuse to provide information that we reasonably require to provide the Service to you, we may not be able to offer you the Service and/or we may terminate the Service provided with immediate effect. Where you choose to receive the Service from us you agree to the collection and use of your sensitive personal information in the way that we describe in this section of the Privacy Notice.

5. Accuracy of Your Information

We rely on the availability of accurate personal information in order to provide the Service to you and operate our business. You should therefore notify us of any changes to your personal information, particularly changes concerning your contact details, bank account details, insurance policy details or any other information that may affect the proper management and administration of your insurance policy and/or the Service provided to you.

6. Recipients of Your Information

We generally share your personal information with the following categories of recipients:

- a. Insurance intermediaries, insurers and underwriters, where necessary to offer, administer and manage the Service provided to you.
- b. Vetting and risk management agencies, such as credit reference, criminal record, fraud prevention, data validation and other professional advisory agencies, where necessary to prevent and detect fraud in the insurance industry and take steps to assess the risk in relation to prospective or existing insurance policies and/or the Service. For example, we may check the Claims Insurance Link to assess and/or validate your previous claims history.
- c. Legal where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature.
- d. Medical professionals, where you provide health information in connection with a claim against your insurance policy or your employer’s insurance policy.
- e. Law enforcement bodies, where necessary to facilitate the prevention or detection of crime or the apprehension or prosecution of offenders.
- f. Public authorities, regulators and government bodies, where necessary for Aon to comply with its legal and regulatory obligations.
- g. Third party suppliers, where we outsource our processing operations to suppliers that process personal information on our behalf. These processing operations shall remain under our control and will be carried out in accordance with our security standards and strict instructions.

- h. Successors of the business, where Aon or the Service is sold to, acquired by or merged with another organisation, in whole or in part. Where personal information is shared in these circumstances it will continue to be used in accordance with this Privacy Notice.

7. Overseas Transfers of Your Information

7.1 We operate on a global and worldwide basis and we therefore reserve the right to transfer personal information about you to other countries to be processed for the purposes outlined in the Privacy Notice. In particular, we may make such transfers to offer, administer and manage the Service provided to you and improve the efficiency of our business operations. We shall endeavour to ensure that such transfers comply with all applicable data privacy laws, regulations and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.

7.2 Where we collect personal information about you in Ireland or the European Economic Area (the “EEA”) we may transfer the information to countries outside Ireland or EEA for the processing purposes outlined in this Privacy Notice. This may include transfers to countries that the European Commission (the “EC”) and the Data Protection Commissioner consider to provide adequate data privacy safeguards and to some countries that are not subject to an adequacy decision. Where we transfer personal information to countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, such as data transfer agreements approved by the EC or the Data Protection Commissioner, as appropriate. Where required, further information concerning these safeguards can be obtained from the Global Data Privacy Office.

8. Retention of Your Information

8.1 Aon Entity retains appropriate records of your personal information to operate its business and comply with its legal and regulatory obligations. These records are retained for predefined retention periods that may extend beyond the period for which we provide the Service to you. In most cases we shall retain your personal information for no more than 7 years after the relationship ceases, unless regulatory or legal obligations imposed on us require specific personal information to be retained for longer. We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

9. Information Security

We have implemented appropriate security measures to protect the confidentiality, integrity and availability of the personal information we collect about you and ensure that such information is processed in accordance with applicable data privacy law.

10. Your Information Rights

10.1 You have the following rights under applicable data privacy law in respect of any personal information we collect and use about you:

- a. The right to access and inspect your personal information or be provided with a permanent copy of the information being held about you.
- b. The right to request the correction of your personal information or in cases where the accuracy of information is disputed, to supplement the information to give notice that you dispute its accuracy.
- c. The right to request the erasure of your personal information, particularly where the continued use of the information is no longer necessary.
- d. The right to object to the use of your personal information, particularly where you feel there are no longer sufficient legitimate grounds for us to continue processing the information.
- e. The right to object to the use of your personal information for direct marketing purposes. See section 11 below for further information.
- f. The right to request the restriction of your personal information from further use, e.g. where the accuracy of the information is disputed and you request that the information not be used until its accuracy is confirmed.
- g. The right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse.
- h. The right to object to decisions involving the use of your personal information, which have been taken solely by automated means. See section twelve (12) below for further information.
- i. The right to complain to the relevant the Data Protection Commissioner concerning our processing of your personal information.



10.2 It is important to note, however, that some of the rights described above in section 10.1 can only be exercised in certain circumstances. If we are unable to fulfil a request from you to exercise one of your rights under applicable data privacy law we will write to you to explain the reason for refusal. Where required, further information concerning these rights and their application can be obtained by contacting the Global Data Privacy Office.

11. Direct Marketing

We will use your personal information to send you direct marketing about other products and services that we feel may be of interest to you. We will give you the opportunity to refuse direct marketing at the point that you apply or register to receive the Service and on each occasion thereafter that you receive direct marketing communications from us. You can also change your marketing preferences at any stage by contacting your account handler or broker.

12. Automated Decisions

Where you apply or register to receive the Service we may carry out a real-time automated assessment to determine whether you are eligible to receive the Service. An automated assessment is an assessment carried out automatically using technological means (e.g. computer systems) without human involvement. This assessment will analyse your personal information and comprise a number of checks, such as credit history and bankruptcy check, health check, validation of your previous claims history and other fraud prevention checks. Where your application to receive the Service does not appear to meet the eligible criteria, it may be automatically refused and you will receive notification of this during the application process. However, where a decision is taken solely by automated means involving the use of your personal information, you have the right to challenge the decision and ask us to reconsider the matter, with human intervention. If you wish to exercise this right you should contact your account handler or broker.

13. Complaints

If you wish to make a complaint about the way we use your personal information you should raise this with us in the first instance. However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the relevant Data Protection Commissioner.

Data Protection Commissioner
Office of the Data Protection Commissioner,
Canal House,
Station Road,
Portarlinton,
Co. Laois,
R32 AP23,
Ireland.

www.dataprotection.ie

14. Changes to this Notice

This Privacy Notice is not contractual and Aon reserves the right to reasonably amend it from time to time to ensure it continues to accurately reflect the way that we collect and use personal information about you. Any updates or changes to this Privacy Notice will be published on this website. You should periodically review this Privacy Notice to ensure you understand how we collect and use your personal information.

15. Contact Information

If you have any questions about the content of this Notice or the rights conferred to you under applicable data privacy law you should contact the Global Data Privacy Office at the following address:

Data Protection Officer,
Metropolitan Building
James Joyce Street
Dublin 1
Ireland
Email: privacy@aon.ie