

Privacy Notice For Bank Of America Ireland Pension Scheme (the “Scheme”)

The Bank of America Ireland Pension Scheme (“Trustees”, “we”, “us” or “our”), hold and process personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we are the controller of your personal data and comply with relevant data protection legislation.

This Privacy Notice describes our practices for collecting, storing, and processing your personal data, your rights in relation to the processing, including the right to object to certain types of processing we carry out. For more information in relation to your rights, see the Your Rights section below.

What information we collect

The types of information we receive and collect depends on the circumstances of process. We require certain of your Personal Details and Scheme Membership and Benefit information to administer the Scheme. Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to record or pay you or your beneficiaries’ benefits.

We collect and process the following information about you:

- **Personal Details** your personal details such as your name, gender, date of birth, contact details (home address and former addresses, telephone numbers and e-mail address), national insurance number / personal public services number, bank account details (in some cases), tax information such as tax credits, copies of identification and country of residence.
- **Scheme Membership and Benefit Information:** information relating to your membership and benefits, including your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings, the category and value of contributions and benefits that you receive, your target retirement age, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders (including information in divorce or dissolution certificates), tax protections or other adjustments, information related to your employment as relevant to your Scheme membership, such as dates of joining and leaving employment (including reason for leaving, where relevant to benefit calculations) and employment history (eg whether part-time or full-time, periods of absence and job title), periods of pensionable service and details of other benefits.
- **Communications Information:** records of communications with you (including any complaints).
- **Sensitive information:** in some cases, special categories of personal data such as your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by members’ employers, other schemes from which members may have transferred, the Revenue, and regulatory bodies and tracing organisations. We also receive information from members about their dependants, next of kin and proposed beneficiaries who may be eligible to receive benefits on the member’s death.

How and why we process your information

Under applicable data protection law (such as the GDPR), companies must have a legal basis to process information. We rely on different legal bases to process your information for the various different purposes described in this Privacy Notice. For each legal basis below, we describe the purposes of our processing (why we process your information) and our processing operations (how we process your information to achieve each purpose). We also list the categories of your information that we process for each purpose.

Legitimate interests

We rely on our legitimate interests or the legitimate interests of a third-party, such as our members, where they are not outweighed by your interests or fundamental rights and freedoms (“legitimate interests”).

Why and how we process your information	Legitimate interests relied on	Information used
For processing information to administer the Scheme, for example:	The processing is necessary for our legitimate interests and in the interests of Scheme members in running and	<ul style="list-style-type: none">• Personal Details.• Scheme Membership and Benefit

Why and how we process your information	Legitimate interests relied on	Information used
<ul style="list-style-type: none"> To communicate with you in relation to your benefits and contributions. To handle requests for transfers and allocation of death benefits. To deal with complaints. To make disclosures at your request such as in relation to transfers to other pension schemes. 	administering the Scheme and providing services to members and beneficiaries of the Scheme.	<p>Information.</p> <ul style="list-style-type: none"> Communications Information.
<p>For processing information to develop policies and improve our processes and our use of technology, for example:</p> <ul style="list-style-type: none"> To develop policies and improve our processes. To test our systems. To upgrade our systems. To use technology to improve the administration of the Scheme. 	The processing is necessary for our legitimate interests and in the interest of Scheme members to improve the administration of the Scheme.	<ul style="list-style-type: none"> Personal Details. Scheme Membership and Benefit Information. Communications Information.
For processing information to make the disclosures to the bank group for audit and corporate transaction purposes.	The processing is necessary for our legitimate interests and in the interests of the bank group to comply with regulatory obligations such as auditing.	<ul style="list-style-type: none"> Personal Details. Scheme Membership and Benefit Information.
<p>For processing information to manage the liabilities of the Scheme, for example:</p> <ul style="list-style-type: none"> To obtain life insurance. For longevity hedging. To carry out scheme mergers. For bulk transfers. For pension increase exchanges and enhanced transfer value exercises, including (where relevant) disclosures to bank group companies or administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice. 	The processing is necessary for our legitimate interests and in the interests of the bank group to manage the liabilities of the Scheme.	<ul style="list-style-type: none"> Personal Details. Scheme Membership and Benefit Information.

Compliance with legal and regulatory obligations

We process information to comply with on-going legal, regulatory and compliance obligations, including assisting with the investigation or prevention of crime. Examples of laws that could give rise to an obligation requiring us to process information we hold about you are:

- Pensions matters: where we are required to process your personal data to comply with our obligations under the Pensions Act, 1990 (as amended).
- Criminal matters: to comply with requests from Irish law enforcement to provide data in relation to an investigation, such as under Section 10 of the Criminal Justice (Miscellaneous Provisions) Act 1997 as amended by 6(1)(a) of the Criminal Justice Act 2006.
- Regulatory matters: to comply with our obligations to engage with regulators, such as the Data Protection Commission and the Pensions Authority under the General Data Protection Regulation and the Pensions Act, 1990, respectively.

Why and how we process your information	Information used
For processing information as required to meet our legal and regulatory responsibilities, including our legal duties to administer the Scheme, for example: <ul style="list-style-type: none"> To communicate with you in relation to your benefits and contributions. To handle requests for transfers and allocation of death 	<p><i>The actual information used depends on the specific legal obligation, but could include any of the following:</i></p> <ul style="list-style-type: none"> Personal Details. Scheme Membership and Benefit Information. Communications Information. Sensitive Information.

Why and how we process your information	Information used
<p>benefits.</p> <ul style="list-style-type: none"> To deal with complaints. To make disclosures at your request such as in relation to transfers to other pension schemes. To record and pay benefits. For reviews we or our administrators. For statistical and reference purposes. For monitoring engagement and activity. For overseeing suppliers. For running communication exercises. For other checks or administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you or to prevent fraud. 	<p>The actual information used depends on the specific legal obligation, but could include any of the following:</p>
<p>For processing information when we comply with a legal or regulatory obligation including, for example:</p> <ul style="list-style-type: none"> To assist with the investigation or prevention of crime. To make the disclosures to auditors, authorities, regulators or government bodies. For example, to comply with a request from the Pensions Authority 	<ul style="list-style-type: none"> Personal Details. Scheme Membership and Benefit Information. Communications Information. Sensitive Information.

Consent

In limited circumstances we process your information with your consent which we obtain from you from time to time.

Why and how we process your information	Information used
<p>For processing information such as when you ask us to make disclosures or allocate benefits or where the Scheme rules require you to provide information which we cannot otherwise process without your consent</p>	<ul style="list-style-type: none"> Personal Details. Scheme Membership and Benefit Information. Communications Information. Sensitive Information.

Sensitive information

In some cases, we process Sensitive Information where necessary for establishing, exercising or defending legal claims or for performing our obligations in the field of employment or where the processing relates to personal data manifestly in the public domain.

Who else processes your data?

Third party service providers

We work with third-party service providers to help us run the Scheme. When we share information with third-party service providers in this capacity, we require them to use your personal data on our behalf in accordance with our instructions and terms.

We work with the following different types of third-party service providers:

- Unio, the Scheme Administrator. To be able to provide this service, Unio may receive Personal Details, Communications Information, Sensitive Information and Scheme Membership and Benefit Information in order to carry out the day to day administration of the Scheme. Unio's privacy notice can be accessed [here](#).
- Grant Thornton, the Scheme's auditor. To be able to provide these services, the auditor may receive Scheme Membership and Benefit Information. Grant Thornton's privacy notice can be accessed [here](#).
- Administration support service providers. To be able to provide these services, these providers may receive Personal Details, Communication Information, Sensitive Information and Scheme Membership and Benefit Information.
- Communication service providers. To be able to provide these services, these providers may receive Personal Details and Communications Information
- IT and hosting service providers. To be able to provide these services, these providers may receive Personal Details, Communications Information, Sensitive Information and Scheme Membership and Benefit Information
- Marketing service providers. To be able to provide these services, these providers may receive Personal Details and Communications

Information.

- Tracing providers, To be able to provide these services, these providers may receive Personal Details.

Other third parties

We also share your personal data with the following third party recipients:

- Bank of America Europe DAC (the “bank”), as the sponsoring employer of the Scheme. The bank may receive Personal Details, Sensitive Information and Scheme Membership and Benefit Information .
- The bank group, who will use the information for audit purposes, in relation to corporate transactions initiated by the bank group, and to allow you to flex your benefits including your pensions options. The bank group may receive Personal Details, Communications Information, Sensitive Information and Scheme Membership and Benefit Information
- Insurance and reinsurance companies, who help us manage our liabilities. This category of third party recipient may receive Personal Details, Sensitive Information and Scheme Membership and Benefit Information
- Public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so. The processing we carry out and the information these third parties receive will depend on the circumstances but could extend to all of the categories of personal data we process.
- Other persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustees or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others. The processing we carry out and the information these third parties receive will depend on the circumstances. For instance, we may disclose personal data to the Scheme’s legal advisers where necessary for the purposes of obtaining legal advice. This could extend to all of the categories of personal data we process, depending on the nature of the required advice.

In some circumstances we are joint controllers with the bank. The bank holds your data to comply with its legal obligations as the sponsoring employer of the Scheme. It has a legitimate interest in the Scheme being run in a cost effective way and may have an interest in offering certain options to members. The Trustees may share information with the bank and its auditors and advisers for this purpose.

Transfers of your information abroad

The personal data you provide to us will from time to time be transferred to other countries, including outside the European Economic Area. Where such transfers are made, we rely on the following transfer mechanisms:

- **Adequacy Decisions:** We rely on decisions from the European Commission under Article 45 GDPR where they recognise that certain countries and territories outside of the European Economic Area ensure an adequate level of protection for personal information. These decisions are referred to as “adequacy decisions”. We transfer the information set out in the section “Information we collect” to our service providers and other third parties who are located in countries with adequacy decisions, such as the UK. The [European Commission](#) adequacy decisions are available at the embedded link. .
- **Standard Contractual Clauses (“SCCs”):** The European Commission has approved [standard contractual clauses](#) under Article 46 of the GDPR for transfers of personal data (available [here](#)). We utilise standard contractual clauses approved by the European Commission for transfers of the personal data described in “Information we collect” to third parties in countries without an adequacy decision or the US where they are not certified to applicable US Data Privacy Framework. If you have any questions about our standard contractual clauses or wish to obtain them, please contact us using the contact details below.
- **Data Privacy Framework.** We rely on the EU-US Data Privacy Framework (DPF) for the transfer of personal data set out in “Information we collect” from the EU to service providers that have certified that they adhere to the Data Privacy Framework Principles.

While transfers to countries that don’t have an adequacy decision typically take place on the basis of the SCCs or DPF, in certain circumstances, transfers can also take place on the basis of exemptions provided for under data protection law.

Storage of your personal data

We store information for as long as necessary for the purposes identified in this Privacy Notice. The retention period depends on the nature of information and why it is collected and processed. In certain cases we may need to keep your information for a longer period for legal reasons such as to respond to a legal request, to comply with applicable law (such as the Pensions Act 1990), to deal with and resolve complaints, and/or for other litigation or regulatory matters.

For example:

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to retain information relating to you until 15 years after the Scheme has wound up.

Once your membership ends, we will generally delete some of the data held in relation to you after 6 years unless we consider it appropriate to keep it longer in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time. Unio in its capacity as an independent controller, will hold on to your personal data for 7 years after the termination of the contract with us. This is to protect themselves against any subsequent legal claims.

Your rights

You have the right to access your personal data and require that we rectify any errors in the data that we hold. In some circumstances, you can also require that we restrict the way we process your personal data, request that we erase your personal data or request a copy of your personal data for the purposes of transmitting elsewhere.

You also have the right to object to our processing of your personal data in some circumstances.

Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

You can exercise any of these rights by contacting us at the address set out below.

Contact details

If you have any questions or complaints about this privacy policy or if you would like to exercise your rights and choices please contact Unio Financial Services Limited on:

Email: boa@unio.ie

Phone: +353 (0) 1 662 1200

Post: 2 Sandyford Business Centre
Burtonhall Road
Sandyford
Dublin 18

Website: www.myuniopension.ie/boa

What if you have a complaint?

To make a complaint about how we've handled your information, contact us as set out above.

If you're not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the supervisory authority in the Member State where you habitually reside or work, or where a breach has taken place. The contact details of the Data Protection Commission in Ireland are available on their website [here](#).

Status of this privacy notice

This privacy notice was last reviewed in October 2025. This document is a notice to you and not a contract between us. We reserve the right to amend it from time to time.

<https://careers.bankofamerica.com/content/dam/careers/privacynotice/emea/Recruitment-Data-Protection-Notice-EMEA.pdf>