

# PROTECTING YOUR PERSONAL INFORMATION

---

The European General Data Protection Regulation (GDPR) supports us in looking after your privacy. Read on to find out how.

## Find out about our policy on privacy and data protection

We're committed to protecting and respecting your privacy. Safeguarding personal information collected for administration purposes is very important to us. We collect personal information from various sources including policyholders, people or entities connected to the policyholder and advisers or agents. An example of a connected person is a life assured or a beneficiary of a trust. We want our policyholders and any connected persons or entities to be confident that their information is in safe hands. So, we've developed this Privacy Statement to explain:

- how and why we collect personal information;
- what we do with it;
- when and why we share it with other organisations, including the types of organisations involved;
- how long we'll keep it for, and
- the rights and choices you have with regards to your personal information.

## Contact us

If you have any questions about this notice or data protection, please contact our Data Protection Officer.

Post: Data Protection Officer, Athora Ireland plc, 2nd Floor, IFSC House, Custom House Quay, Dublin, D01 R2P9, Ireland.

Email: [dataprotection.ai@athora.com](mailto:dataprotection.ai@athora.com)

## How and why we obtain personal information about you

You or someone representing you, for example, your financial adviser, may give us information about you and also about others, such as any persons or entities connected with your policy, plan or bond. This information may be captured by completing forms or through our website, including our online services platform (or potentially social media platforms) or by contacting us by phone, email or otherwise. This includes information you provide when you:

- search for a product;
- submit an application;
- communicate with us by letter;
- send us administration forms;
- call us;
- take part in discussion boards or other forms of social media;
- complete a survey, or
- report a problem with the website.

Depending on the circumstances, the personal information we gather about you may include:

- your name;
- address;
- date of birth;
- policy/plan number;
- gender;
- email address;
- phone number;
- financial information to include tax identification reference numbers and tax residency status;
- medical information, and
- any further personal information required as part of a product application or as part of administration forms, or claims management or which you share through the website.

You can find additional information on the more common ways we collect personal information and why below:

## Application forms and ongoing administration

When you apply for a product, service or agency with us, you supply us with personal information. We keep this on our computer systems and in manual records. It could include information not only about you but also about other interested parties, such as any individuals and entities you've disclosed. We'll use your personal information and any personal information of other interested parties which you have disclosed to us:

- to assess your application for a plan, bond, or agency;

- for administration when the plan, bond, or agency has been set up, and
- to provide services to any arrangement or trust that your plan or bond is part of.

### Phone calls

We'll ask you for some personal details to identify you when you call us and to allow us to confirm that you're the owner or representative of the plan. We'll hold details of the call for audit and administration purposes and to enable us to facilitate the contract. The recording of the call may be kept for up to seven years and in line with our retention policy, so that we can meet our legal obligations when resolving complaints or legal disputes.

### Information obtained automatically through your use of the website and our tools (including cookies)

Our website uses cookies and similar technologies such as tags and pixels to distinguish you from other users of the website. This enables us to improve your user experience when you browse the website and improve the overall website functionality. We won't use cookies to collect information that could personally identify you. For further information please see our [privacy FAQ](#).

### Surveys

We may capture some personal information about you if you complete customer surveys. We'll hold details of the survey for audit and administration purposes. The information captured within the survey may be kept for up to seven years and in line with our retention policy.

### Publicly available information

We may collect and use information about you which has been made publicly available as part of our claims investigation and decision making process.

We may use your information for statistical or research purposes or for testing our systems.

If we do this your personal information will be anonymised so that you can't be identified.

Our data security policies mean that we hold all personal information securely and limit access to those who need to see it. We apply extra security to sensitive personal information, such as medical details, which you have opted to supply to us as proof of your health.

### Policyholder providing third party information to us

If you provide us with information relating to any individuals or entities connected with your plan or bond, you must take all steps necessary to legitimise your processing of their personal information. You can meet this requirement by:

- obtaining their consent to processing the information before you share it with us;
- provide our information to the individual or entity connected with your plan or bond;
- provide them with a copy of our '**Protecting your personal information**' leaflet, and
- tell them the details of your disclosure of their information to us, the purposes for which it has been disclosed, our possible further disclosure of information as necessary, and that they have rights of access to and correction of their personal information.

By providing us with any information originating from a third party, you confirm that you've taken and completed these steps.

### Sharing your personal information

#### Other organisations and third parties

We'll share permitted relevant information:

- with certain bodies when we legally have to, for example regulatory bodies or authorities such as the UK's Financial Conduct Authority or the Irish Revenue Commissioners;
- with HM Revenue & Customs where one or more policyholders is either a UK tax resident or has a UK address;
- to comply with international tax obligations for example Foreign Account Tax Compliance Act (FATCA) and Common Reporting Standard for Automatic Exchange of Financial Account Information (CRS);
- when we need to in order to comply with money laundering laws and for other purposes, for example detecting crime;
- with people who are acting on your behalf and with people who are acting as agents on your behalf (for example your financial adviser), so that they can fully carry out their role as your agent;
- with other affiliated companies;
- with anybody you assign or transfer your policies to in the future;
- with third party providers where it's reasonably necessary to do so to enable them to provide services to us in relation to your policies, and
- with reinsurers we do business with.



## Service providers

We work with carefully selected service providers that carry out certain functions on our behalf. These include, but are not limited to, companies that help us with:

- technology services;
- outbound customer communication and scanning of correspondence;
- banking services, and
- tracing of customers who we've lost contact with.

We only share the appropriate level of personal information necessary to enable our suppliers to carry out their services and we require them to keep the information safe and protected at all times. Our suppliers must only act on our instructions and can't use your personal information for their own purposes.

## Financial Crime Prevention

Our aim is to protect our customers and ourselves from money laundering and fraudulent claims, and to discover those responsible for such crimes. We're legally obliged to disclose to certain bodies details of our customers and the products and services they have with us. Those requiring this information may include the Financial Conduct Authority, other regulatory bodies and following legal advice, the police and courts. We may also disclose information to your own professional advisers.

Please contact the Data Protection Officer if you'd like to receive any further information.

## Sharing of special categories of personal information, for example medical information

You may have opted for a contract where you have the option of asking us to provide proof of your good health. This can be used in inheritance tax negotiations, for example if you die within seven years of taking out the plan or bond.

If you choose this option, we'll need to underwrite your health. This underwriting would involve processing 'sensitive personal data' about you (including any medical information) in accordance with the European General Data Protection Regulation (GDPR), Irish data protection law and any applicable national privacy legislation. Sensitive personal data may include information about your physical or mental health or condition and sexual life.

We may contact your medical practitioner for information and we may also need to ask for additional information from other insurers or medical practitioners who've cared for you to check details, or get clarification or expansion of your answers.

We may use a third party to underwrite the policy and may share with it relevant information about you

in order that it can carry out the underwriting.

In turn it may share this information with medical professionals or healthcare management companies (who would be used to collect medical information, for example through medical examinations).

These people and organisations may be based in the UK but would come under Irish data protection legislation. We'd have a contract and a confidentiality policy in place with the third party, which would stipulate that it holds your personal and sensitive medical information securely and limits access to those who need to see it.

Any sensitive personal information such as medical information collected by us will be held securely and in accordance with our stringent data protection policies. The collection and processing of sensitive personal data would be on a need-to-know basis. We'd securely destroy any information that isn't required.

## Tax sharing obligations

To comply with international tax obligations, we may share your information and the information you've provided us in relation to any individuals and entities connected with your plan or bond with Irish Revenue, for the purposes of both the FATCA and CRS. For FATCA, we must report a US connection and for CRS, we must report non-Irish residency. The information we share with Irish Revenue will include name, address, date of birth, tax identification number, policy number and policy value. In accordance with legislation, Irish Revenue will exchange this information with the Internal Revenue Service for FATCA purposes if there's a US connection, and for CRS, they'll share it with the relevant tax authorities. For more information, please visit Irish Revenue's website [revenue.ie](https://www.revenue.ie) We may also share your information with HM Revenue & Customs where one or more policyholder is either a UK tax resident or has a UK address.

## Additional data sharing obligations

Other than the circumstances detailed above, we won't disclose your personal information to any third parties, except:

- when protecting your interests or the interests of other individuals or for reasons of substantial public interest;
- in connection with any legal proceedings (including prospective legal proceedings);
- in order to establish or defend our legal rights;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets, or
- if we, or substantially all of our assets, are acquired by a third party, we may disclose your personal



data to that third party in connection with the acquisition.

With your consent, we would also share your information with the Financial Ombudsman or other appropriate persons if the need arises.

### **Personal information processed outside of the European Economic Area (EEA)**

The personal information that we collect may be transferred to, and stored at a destination outside the European Economic Area (EEA), in connection with the above purposes.

This could be to other affiliated companies or to service providers working on our behalf. Where any such processing takes place, appropriate controls, such as the adoption of agreements containing the appropriate standard clauses, are in place to ensure that your information is protected to the same standard as if it were in the UK or Ireland.

### **Retention of personal information**

In most circumstances, we'll keep your personal information for the lifetime of your plan or bond and up to seven years after your relationship with us ends (for example, if you fully cash in your plan or bond). This is to ensure that we comply with our retention obligations, the Central Bank of Ireland requirements and other regulatory and legislative requirements.

In very limited circumstances, we're required to keep some specific information for longer, for example, in order to comply with the Unclaimed Life Assurance Policies Act, but we regularly review our retention obligations to ensure we don't keep personal information longer than we're legally obliged to.

### **Your rights**

You have a number of rights under the Data Protection laws, including:

- the right to request a copy of the personal information we hold on you. When you request this information, this is known as making a Subject Access Request (SAR). In most cases, this will be free of charge, however in some limited circumstances, for example, repeated requests for further copies, we may apply an administration fee;
- the right to have personal information we hold about you transferred securely to another service provider in electronic form;

- the right to have any inaccurate personal information corrected;
- the right to have any out-of-date personal information deleted once there's no business need or legal requirement for us to hold it;
- the right to object to some processing, in limited circumstances and only when we don't have legitimate grounds for processing your personal information;
- the right to object to your personal information being used to send you marketing material (this is a general right under Data Protection laws. We do not use your personal information for marketing material, and therefore you will not need to exert this right during your dealings with us), and
- the right to ask for a decision to be made manually, where a decision is made using automated means and this adversely impacts you.

To exercise any of these rights, please write to our Data Protection Officer at:

Athora Ireland plc  
2nd Floor  
IFSC House  
Custom House Quay  
Dublin  
D01 R2P9  
Ireland

You should also provide means by which we can verify your identity.

### **Making a complaint**

If you believe we haven't processed your personal information in accordance with our Data Protection obligations, and that you've been affected by our non-compliance, you can make a complaint to us by contacting our Data Protection Officer.

If you're not satisfied with our response, you can raise a complaint with the Data Commissioner's Office, the Irish independent authority set up to enforce the Data Protection Regulations.

Address: Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland or on its website at [dataprivacy.ie](https://www.dataprivacy.ie)

