

Privacy Notice

March 2019 – Irish Branch

Who We are

elipsLife provides insurance products which pay benefits in the event of death, long-term injury or illness on a group and individual basis.

Elips Life Limited, Irish Branch with a registered office at 6 Ely Place, Dublin 2, Ireland (“**elipsLife**”, “**we**”, “**us**”) is the company that controls and is responsible for Personal Data that is collected in relation to our insurance products. As the data controller of the Personal Data we identify the purposes and manner in which your Personal Data is processed.

The Purpose of this Notice

“**Personal Data**” is information which can be used to identify a person including the categories listed below.

Any Personal Data provided to elipsLife is treated in compliance with the Irish Data Protection Acts 1988 to 2018 and the General Data Protection Regulation (the “**Data Protection Laws**”). This Privacy Notice explains how elipsLife collects and uses your Personal Data and who we share it with. It also explains your rights under Data Protection Law in relation to your Personal Data.

Contact Details of our Data Protection Officer

If you have any queries or complaints in connection with our processing of your Personal Data, or wish to request access, correction of inaccuracies or deletion of your Personal Data please contact us using the following contact details:

By Post: Data Protection Officer, Elips Life Ltd, 6 Ely Place, Dublin 2, Ireland

By E-Mail: compliance@elipslife.com

Categories of Personal Data Collected

We may collect Personal Data from you, your employer or your employer’s scheme trustees, registered administrator or other third parties including medical professionals where medical information is necessary to underwrite or administer your policy, financial brokers or advisors, private investigators appointed in connection with a claim and other insurers.

The categories of Personal Data which may be collected in order to be able to provide insurance cover to you include:

- Biometric data including your name, date of birth, address, gender, family relationships, PPSN number

- Health-related personal data including your medical history
- Employment related details including your employee number, employer, date joined the company, salary, occupation, details of sick leave and/or long term absences, normal retirement age
- Payment data where relevant including the BIC, IBAN, account name and the name of your bank/building society or credit card details where relevant

Our Purposes for Processing Personal Data

elipsLife will use your Personal Data to:

- assess your eligibility for cover;
- manage and administer your policy;
- calculate insurance premium and for other purposes;
- assess and manage any claims made under the insurance policy including verification of your legal representatives and assignees;
- medical underwriting if applicable
- make and receive payments in relation to claims; and
- the prevention and detection of financial crime.

We will also use your Personal Data for the purposes of management and audit of our business operations, establishment and defence of legal rights, legal and regulatory compliance and other legitimate interests of elipsLife including quantifying risk exposure and undertaking experience analysis for setting insurance premiums.

You are free not to provide your Personal Data to us. However, if your Personal Data is not provided to us, we may not be able to offer you insurance cover, continue to provide you with insurance cover or process any claim you have made.

Consent

In order to process certain Personal Data in relation to you, we may require your consent. When we process your Personal Data on the basis of your consent, you are free to withdraw your consent at any time. You can withdraw your consent by contacting our Data Protection Compliance Officer using the contact details below. Please note that if you withdraw your consent we may not be able to offer you insurance cover, continue to provide you with cover or process any claim you have made.

Who We Share Personal Data With

elipsLife may share your Personal Data with trusted third party service providers who facilitate the running of our business and provide us with specialist services. Where our service providers have access to your personal data, we ensure they are subject to appropriate contractual obligations to protect your Personal Data. These trusted providers we use include

- Medical professionals, independent health care providers delivering medical assessment services to us which involve where necessary conducting tele-interviews, fitness to work assessments, early intervention and/or return to work programmes;
- Private investigators for the investigation of fraudulent claims.
- Payroll solutions providers which calculate and process taxable benefit payments on our behalf.



Where elipsLife is providing cover on a Group Scheme, it may share your Personal Data in the communication to your employer, the trustee or your employer's agent (such as an insurance broker) of any underwriting decision, claims data and/or claims history.

Your Personal Data may be shared with any of our group companies, brokers, other insurers, reinsurers, healthcare professionals, regulators, government agencies, Revenue and other tax authorities, the Pensions Authority and other trusted service providers. We may also share Your Personal Data if required under law or regulation or if directed by a court of competent jurisdiction or for the purposes of fraud prevention.

elipsLife may share Personal Data we hold with any member of the elipsLife group (which means elipsLife's parent or subsidiaries), elipsLife's ultimate holding company and its subsidiaries some of which are located in Switzerland. Switzerland has been deemed by the European Commission as having a level of data protection which is deemed "adequate" by European standards. If this changes in the future we will ensure that a lawful transfer mechanism will be put in place before transferring any Personal Data to Switzerland.

Transfer outside the EEA

elipsLife may transfer Personal Data to jurisdictions outside the European Economic Area ("EEA"). The laws of those jurisdictions may not provide the same level of protection for your Personal Data that Irish law does. In such circumstances we will take such steps as may reasonably be required so that your data is treated securely and in accordance with this policy, including through the implementation of appropriate or suitable safeguards in accordance with applicable data protection laws.

Retention of Personal Data

Appropriate legal and security measures are used to protect your Personal Data. Your Personal Data will be retained in accordance with our record retention policy which operates on the principle that we keep Personal Data for no longer than is necessary for the purposes we collected it. Personal Data is also kept in accordance with any legal or regulatory requirements.

Your Rights under Data Protection Law

You have various rights under Data Protection Law, subject to certain exemptions, in connection with our processing of your Personal Data:

- Right to access the data - You have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.
- Right to rectification – You have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete.
- Right to erasure – You have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.
- Right to restriction of processing or to object to processing – You have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.



- Right to data portability – You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.

In order to exercise any of the above rights, please contact us using the contact details set out below.

Automated Processing

We confirm that you will not be subject to a decision based on automated decision-making / profiling.

Questions and Complaints

If you have any queries or complaints in connection with our processing of your Personal Data, you can get in touch with us using the following contact details:

By Post: Data Protection Officer, Elips Life Ltd, 6 Ely Place, Dublin 2, Ireland

By E-Mail: compliance@elipslife.com.

You also have the right to lodge a complaint with the Data Protection Commission if you are unhappy with our processing of your personal data. Details of how to lodge a complaint can be found on the dataprotection.ie website, or you can call the Data Protection Commission on 1890 252 231.

Latest Version of Our Privacy Notice

ElipsLife may from time to time be required to modify its Privacy Notice to comply with changes in laws and regulations. Please refer to our website www.elipslife.com for the most up-to-date version of our Privacy Notice.