

# Privacy Policy

## SEB Life International Assurance Company DAC

This Privacy Policy explains how we process (e.g. collect, use, share and otherwise process) your personal information. We will process any personal information about you in accordance with this Privacy Policy, as well as applicable law.

### 1 Who Are We?

The company responsible for the processing of your personal information is: SEB Life International Assurance Company DAC, Bloodstone Building, Riverside IV, Sir John Rogerson's Quay, Dublin 2, Republic of Ireland, company no. 218391, authorised by the Central Bank of Ireland as a life insurance undertaking under number C771. Our contact address is as above, telephone number +353 1 487 0700, facsimile number +353 1 487 0704, email: dataprotection@seb.ie.

### 2 Why Do We Process Your Personal Information?

We process personal information about you:

- to comply with our legal, regulatory and compliance obligations
- to arrange, issue and administer you with a policy of insurance, or to record you as a life assured or beneficiary on a policy of insurance, to make payments of claims and benefits, and to respond to your queries relating to same
- to liaise effectively with persons representing you such as your intermediary and financial adviser
- to invest your policy fund with an appointed asset manager and place custody of your assets and cash with a custodian
- to reinsure the risks on your policy of insurance
- to verify your identity, protect against potential fraud, investigate compliance oversights, and respond to complaints.

### 3 What Personal Information Do We Process About You?

We only process personal information about you for the specific purposes mentioned above under Section 2, and we only process personal information that is necessary. We may process the following categories of personal data about your name and address, date and place of birth, gender, personal contact details, tax identification details, passport and personal identification card numbers and details, family members, financial information and details of your appointed life assured and beneficiaries.

In relation to certain life policies we may also process certain special categories of data such as data concerning health. For anti-money laundering purposes we collect information on whether you are a politically exposed person (PEP), which may indicate political opinions.

### 4 Why Are We Allowed To Process Your Personal Information?

Our processing of your personal information requires a legal basis. We may process your personal information described above based on the following legal bases:

- If you provide us with special categories of data (such as data concerning health), your explicit consent;
- If you are a proposer or a policyholder the processing is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract or the processing is necessary for our

compliance with a legal obligation that we are subject to;

- If you are a life assured (and not a policyholder) or a beneficiary or some other person (guardian, adviser, representative or pledgee) the processing is necessary for the purposes of legitimate interests pursued by us, being the payment of claims and benefits under a policy of insurance for the benefit of you or others or the processing is necessary for our compliance with a legal obligation that we are subject to.

### 5 How Do We Obtain Your Personal Information?

If you are a policyholder we will obtain personal data directly from you and we may also receive personal data from persons acting for you, for example, intermediaries. If you are the life assured person, we will obtain personal data (which may include data concerning health) from you and also, with your consent from practitioners, physicians, dentists, members of medical professions, employees of hospitals and health authorities as well as medical facilities.

If you are named on a policy as a life assured or a beneficiary, we will obtain personal data which does not comprise data concerning health from the policyholder.

We may also obtain publicly accessible information from company registers, national population registers and compliance systems.

## 6 How Do We Share Your Personal Information?

We may share your personal information with public authorities to comply with laws relating to anti-money laundering, terrorist financing, bribery and corruption; and for reportable accounts under the Common Reporting Standard and (if you a 'US Person') the Foreign Account Tax Compliance Act (FATCA). We also share information with our parent company Skandinaviska Enskilda Banken AB and its subsidiaries, agents, subcontractors and third party service providers of the SEB Group and persons acting on our behalf such as custodians and asset managers and persons acting for you such as your intermediary. In relation to special categories of data (such as data concerning health) we also disclose the information to our reinsurer.

Your personal information may also be processed by us and other members of the SEB Group, our agents, subcontractors and third party service providers for any other purpose required for or reasonably incidental to the performance of our duties or for the purpose of due diligence by any third parties in the context of any proposed merger, acquisition, refinancing or re-organization of our business involving such third party.

## 7 International Transfers

We may transfer personal information that is collected from you to a third-party data processor located in a country that is outside of the European Economic Area in connection with the above purposes. We will only do so where the European Commission has decided that the country or the processor we are sharing your information with will protect your information adequately; or the transfer has been informed to the Data Protection Commissioner in Ireland and recorded in writing and we have entered into a contract with the processor with which we are sharing your information (on terms approved by the European Commission) to ensure your information is adequately protected.

You may request a copy of the suitable safeguards we implement for our third country processing by writing to: [dataprotection@seb.ie](mailto:dataprotection@seb.ie).

## 8 For How Long Will We Retain Your Personal Information?

We will retain your personal information only for as long as it is necessary to provide you with the services requested by you or as long as needed for a legitimate purpose, and then for as long as required by applicable law.

## 9 What If The Provision Of Your Personal Information Is Mandatory?

You are obliged under certain statutory and/or contractual requirements to provide personal data to us, and the failure to comply with these requirements may mean that we are unable to issue a policy to you, or if your policy is in place, are unable to carry out wholly or partially certain matters which are necessary for the administration of your policy.

Failure to provide complete and correct information may also void a claim on a policy or part of it.

## 10 What Are Your Rights?

- You have the right to request access to and rectification or erasure of your personal data. If your information changes or you believe we have information which is inaccurate or not up-to-date please let us know and we will change it.
- You also have the right to object to the processing of your personal data and have the processing of your personal data restricted.
- If processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. If you wish to withdraw your consent, such withdrawal may prejudice your right (or the right of others) to claim a benefit under a policy of insurance and/or may require us to terminate the policy as performance of the contract can not be carried out.

From 25 May 2018 you have the right to receive your personal information in a structured, commonly used and machine-readable format (data portability).

There may be conditions or limitations on these rights. It is therefore not certain for example you have the right of data portability in the specific case - this depends on the specific circumstances of the processing activity.

There is no cost for exercising any of these rights. To make any request please write to [dataprotection@seb.ie](mailto:dataprotection@seb.ie).

You may always lodge a complaint with ourselves at [dataprotection@seb.ie](mailto:dataprotection@seb.ie) or with the Data Protection Commissioner in Ireland, whom can be contacted at :

Office of the Data Protection Commissioner.

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