

Appendix 1- Data Privacy Notice

Allianz Global Life dac (“AGL”), a part of the Allianz Group, is an Irish authorised insurance company providing insurance products and services on a cross-border basis. It operates through distribution agreements with investment firms, insurance brokers and banks, as well as online.

AGL is committed to safeguarding the personal information collected from our Policyholders (the Employer), Insured Persons (the Employee) and their Beneficiaries. In accordance with article 13 of Regulation (EU) 2016/679 (hereinafter the “General Data Protection Regulation” or “GDPR”), this Data Privacy Notice explains how and what type of personal data will be collected, why it is collected and to whom it is shared or disclosed.

Please read the following information carefully.

1. Who is the Data Controller?

A data controller is the natural or legal person, public authority, agency or other body which (alone or jointly with others) determines the purposes and means of the processing of personal data. Allianz Global Life dac, with registered office in Maple House, Temple Road, Blackrock, Dublin, Ireland, phone no. 00353 1 2422300 e-mail dataprivacy-agl@allianz.com is the Data Controller as defined by the GDPR .

2. What type of personal data is collected?

AGL processes (collects, records, stores, shares and otherwise uses) the personal data of the Insured Person and the Beneficiaries (hereinafter each one of these may also be identified as the “Data Subject”), such as their name, address, gender, date of birth, place of birth, telephone number, e-mail address, tax identification number, identity document number and bank details (the “Data”).

AGL may also collect and process “special categories of personal data” about the Insured Person, such as the results of medical examinations, information taken from death certificates, searches of public sources for evidence of criminal convictions or political position holders.

3. What is the legal basis for the processing of the Data?

The personal data provided by the Data Subject or by other authorized individuals, will be processed for the following purposes:

Purpose	Is explicit consent required?	Is provision of data mandatory? What are the consequences of the refusal to provide personal data?
3.A INSURANCE RELATED PURPOSES		
Fulfilment of pre-contractual and contractual obligations and obligations deriving from the insurance relationship with the Data Subject; Execution of the Contract, including risk evaluation, premium collection, prevention and identification of insurance fraud as well as purposes in connection with the handling and settlement of claims and disbursement for other reasons; Handling of specific requests of the Data Subject, as well as for the provision of the benefits related or ancillary to the Contract.	Yes – AGL will obtain express consent only for “special categories of data” such as data concerning health of the Insured Person , which will be collected and processed inside or outside the European Economic Area (EEA) in order to execute and administer the Contract.	Yes – the provision of the personal data, including granting of the consent to processing of health related data, is mandatory. In case of refusal to provide the data, AGL may not be in position to execute and administer the Contract.

3.B ADMINISTRATIVE PURPOSES		
Carrying out of administrative - accounting activities and those concerning the performance of the insurance activity, to which AGL is authorized such as the redistribution of the risk through co-insurance and/or reinsurance	No	Yes - the provision of the personal data, including granting of the consent to processing of health related data, is mandatory. In case of refusal to provide the data, AGL may not be in position execute and administer the Contract. and the related benefit request.
3.C PURPOSES SET FORTH BY THE LAW		
Compliance with legal obligations (e.g. fiscal, accounting and administrative obligations) required under EU regulations or orders issued by the competent national authorities and other public bodies.	No	Yes - The provision of personal data is mandatory for the purposes set forth by the law. The refusal to provide the data would prevent AGL from the fulfilment of the obligations set forth by the law.
3.D MARKETING PURPOSES		
Carrying out of marketing activities by the Data Controller or the other companies of the Allianz Group or by selected third parties through the sending of advertising material, direct sale, carrying out of market research, commercial communications concerning services and products of AGL as well as products and services of the Allianz Group or third companies (business partners of AGL) by traditional and/or distance communication means (such as email , phone and any other form of electronic communication).	Yes – AGL shall obtain explicit consent from the Data Subject	No - The provision of data for marketing purposes is optional. In absence thereof, the Data Subject shall not be able to receive marketing communications specific for his/her profile.

For those purposes indicated above where it is indicated that AGL does not require Data Subject’s explicit consent, the personal data will be processed based on the lawful basis (refer to 3.A & 3.B above) and/or to comply with the legal obligations (refer to 3.C above).

The Data Subject may, at any time, withdraw any consent granted as set forth in section 9 of this Data Privacy Notice.

4. How is the Data collected and processed?

AGL will obtain the personal data directly from Data Subject and / or from the following organizations and individuals: companies part of the distribution chain, physicians, nursing and hospital staff, other medical institutions, care homes, statutory health insurance funds, professional associations and public authorities.

In relation to all of the purposes mentioned above, the personal data will be processed manually or by using electronic means which are adequate for the storage, safeguard and communication of such data. For such purpose, all of the necessary security measures will be taken in order to ensure that there is a sufficient level of protection from non-authorized accesses, loss or accidental destruction of the data.

For such purpose, access to AGL’s databases and records will be limited to: i) the employees of AGL specifically identified and authorized to carry out the processing; ii) individuals external to the organization of AGL, part of the insurance chain or service companies who may act, from case to case, as autonomous data controllers or external data processors.

5. Who will have access to the Data?

For the purposes set forth in section 3.A, 3.B and 3.C of this Data Privacy Statement, the Data of the Data Subject may be disclosed to the following entities acting as independent data controllers: public authorities and organisations, other insurers, coinsurers, reinsurers, consortia and trade associations, insurance brokers, banks, stock brokers and asset management companies.

For the purposes set forth in section 3.A, 3.B and 3.C of this Data Privacy Statement, the Data of the Data Subject may also be shared with the following parties who operate as data processors under our instruction: members of Allianz Group, companies in the distribution chain; technical consultants and other persons providing auxiliary services on behalf of AGL, such as legal advisers, experts and medical practitioners; financial settlement agencies; claims management, adjustment and payment agencies; legal protection consultants and support centres; approved clinics; data storage companies or IT service providers; mail delivery companies; audit companies and consultants; business information companies for financial risk analysis; fraud control agencies; debt collection agencies.

For the purposes set forth in section 3.D of this Data Privacy Statement, the Data of the Policyholder may be shared with the following parties who operate as data processors under our instruction: Advertisers and advertising networks to send marketing communications, as permitted under local law and in accordance with Policyholder's marketing preferences.

An up-to-date list of those entities may be requested, free of charge, by contacting AGL as set forth in section 9 of this Data Privacy Notice.

6. Where will the Data be processed?

The personal data may be processed both inside and outside of the European Economic Area (EEA) by the parties specified in Section 5 above, subject always to contractual restrictions regarding confidentiality and security in line with applicable data protection laws and regulations. AGL will not disclose personal data to parties who are not authorized to process them.

Whenever AGL transfers personal data for processing outside of the EEA by another Allianz Group company, it will do so on the basis of Allianz' approved binding corporate rules known as the Allianz Privacy Standard (Allianz BCR) which establish adequate protection for personal data and are legally binding on all Allianz Group companies. Allianz BCR and the list of Allianz Group companies that comply with them can be accessed to the following address https://www.allianzgloballife.com/en_IS/DocumentsandForms.html. Where the Allianz BCR do not apply, AGL will instead take steps to ensure that the transfer of the personal data outside of the EEA receives an adequate level of protection as it does in the EEA. Details of what safeguards AGL relies upon for such transfers (for example, Standard Contractual Clauses) can be requested by contacting AGL as detailed in section 9 of this Data Privacy Notice.

7. How long will the Data be kept for?

The personal data collected, pursuant to paragraphs 3.A 3.B,3.C and 3.D of this Privacy Notice, will be retained for a period of time which is equal to the duration of the Contract (including any renewals thereof) and for the following 10 years from the expiry, termination, withdrawal from the latter, save for cases where a longer retention period is required for possible disputes, requests of the competent authorities or pursuant to the applicable legislation.

Once the retention period is over the data will be deleted or anonymized.

8. What are the rights of the Data Subject in respect of his/her personal data?

As set forth by the applicable legislation on data protection, the Data Subject has the right to:

- Access the personal data held about him/her and to learn the origin of the data, the purposes and ends of the processing, the details of the data controller(s), the data processor(s) and the parties to whom the data may be disclosed;
- Withdraw the consent at any time where the personal data is processed based on his/her consent; This does not include cases where the processing is required to fulfil a legal obligation of the Data Controller or to execute a public interest task or is in connection with exercising official authority by the Data Controller;
- Request to have the data updated or corrected so that it is always accurate;
- To obtain from the controller the erasure of personal data concerning you without undue delay;
- Request to restrict the processing of the personal data in certain circumstances;
- Obtain your personal data in an electronic format for own use or for a new insurer; and
- File a complaint with us and/or the relevant data protection authority, where legal conditions are met.

The Data Subject may exercise these rights by contacting AGL as detailed in section 9 of this Data Privacy Notice providing his/her name, email address, account identification and purpose of the request.

9. How can AGL be contacted?

Any queries about how the personal data is used or how to exercise the Data Subject's rights can be addressed to the Data Protection Officer by telephone, email or post as follows:

Data Protection Officer
 c/o Allianz Global Life dac
 Maple House
 Temple Road
 Blackrock
 Co. Dublin
 Ireland
 Number: 00353 1 2422300
 e-mail: dataprivacy-agl@allianz.com

10. How often is this Data Privacy Notice updated?

AGL regularly reviews this Data Privacy Notice. AGL will ensure that the most recent version is available on the company's website https://www.allianzgloballife.com/en_GB.html and will inform the Data Subjects directly of any important amendments that may impact him/her or require his/her consent.

This Data Privacy Notice was updated on 21/11/2018.