

## Data Privacy Notice

### 1. Introduction

At Octium Life DAC (“Octium” “The Company”, “We”, “Us” or “Our”) we are dedicated to protecting the confidentiality, integrity and privacy of your information. As part of this fundamental obligation, Octium is committed to the appropriate protection and use of the personal information (sometimes referred to as “personally identifiable information”, “PII”, “data” or “information”) that we collect. It is important that you know exactly what we do with your personal information, why we gather it and what this means to you. This notice explains how your information is used and what rights you have under the General Data Protection Regulation (GDPR).

At Octium we are committed to:

- Protecting you and your information
- Giving you control
- Being transparent
- Creating value for you

Please take the time to read this notice carefully. If you have any questions about how we use your information, please contact us or our Data Protection Officer (DPO) at the details provided in Section 14 “How to contact us and/or our Data Protection Officer “of this Privacy Notice.

### 2. Who we are

Your information is gathered, stored, shared and used by Octium Life DAC, who control your information (Data Controller). Our registered address is First Floor, College Park House, South Frederick Street, Dublin 2, Ireland.

### 3. The information we collect about you and why

We use personal information to process our applications, service our policyholders, process claims and pay benefits.



In addition to the categories below, we also gather information about you provided by others, such as your Intermediary, information which you have consented to us using and other personal information.

The Company may use your information even though you are not a policyholder. For example, you may be a beneficiary or representative of a policyholder.

The Company must have a lawful basis to collect and use personal information, which is set out in section 11 “Legal Basis for using your data”.

The following is a list of Personal Information that the Company may request:

A. Identity & contact information

Name, date of birth, identification documentation, contact details, nationality, address, tax residency, tax identification number, occupation and family details.

B. Financial Details

Bank account details, transaction details and information relating to power of attorney arrangements.

C. Information you provide to us about others

You may provide information to us about someone else (for example, information about a beneficiary). The Company will ensure that any data that you provide to us which pertains to someone else, will receive the same level of protection and privacy as described in this Data Privacy Notice. Before you disclose information to us about another person, you should be sure that you have their permission to do so.

D. Sensitive Categories

We may hold certain information about you which is categorised as sensitive personal data, such as mental or physical health, sexual orientation or criminal conviction information. We will process this information when required for the purposes of the product or services we provide to you or where/when we have a legal obligation to do so.



## E. Online activities

We may collect information about your use of our website using technology known as cookies, which can often be controlled through internet browsers. For detailed information on the cookies we use and the purposes for which we use them, please see our Cookie Policy, which is available on our website.

### **4. When we collect your information**

We collect/store information you provide:

- When you complete your application form
- When you use our products or services
- When third parties provide us with your information.

### **5. How we use your information**

Octium will use and share your data where:

- Its use is necessary to provide our products and services to you and perform our contract with you.
- You have agreed or explicitly consented to the using of your data in a clear and specific way.
- Its use is necessary to protect your “vital interest” in exceptional circumstances.
- Its use is in accordance with our legitimate interests, where such use does not override your interest or fundamental rights and freedoms.
- Its use is necessary for strategic planning and business portfolio management.
- Its use is necessary to comply with legal and regulatory obligations including:
  - Establishing your identity, residence and tax status in order to comply with law and regulation concerning taxation and the prevention of money laundering, fraud and terrorist financing;
  - Requirement by law to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities;
  - Complying with binding requests from regulatory bodies, including the Central Bank of Ireland;



- Complying with court orders arising from civil or criminal proceedings;
- Performing a task carried out in the public interest.

## **6. Who we share your data with**

We only share your information with a select number of individuals and companies as necessary. When providing our services to you, we share your information with:

- Data Processors (companies that act as service providers that are under contract with us and only process your personal information as instructed by us. Your personal information is transferred securely and is not used by other parties for any other reason. We use other Data Processors for services including document management, administration, underwriting, payment facilitation, Financial Sanctions and PEP screening);
- Intermediaries (the person/persons or companies that you have chosen to act as your intermediary to give service and advise to you on our products);
- Health Professionals (where/when needed for underwriting and for the payment of benefits);
- Reinsurers (that we are in contract with in order to have our policies and claims underwritten);
- Regulators and Revenue Commissioners or other bodies as needed to comply with regulations and laws;
- Courts and court appointed persons/entities;
- National Treasury Management Agency (NTMA) and its agent's;
- The Irish Police force if required by law.

Octium will take all reasonable steps as required by law to ensure the privacy, confidentiality, integrity and safety of all personal data held by us.

## **7. Transfer of data outside of the European Economic Area (EEA)**

Your personal information is processed and stored within the EU. Your data may be transferred to recipients that operate outside the European Economic Area. The Company ensures that any communication of your personal data to recipients outside of the Economic Area European will take place in compliance with the provisions of the GDPR.



Octium will ensure that suitable safeguards are in place to protect the privacy and integrity of your personal data in such circumstances. For more information in this regard, please do

not hesitate to contact the Company at the address provided in Section 14 "How to contact us and/or our Data Protection Officer" of this Privacy Notice.

## **8. How long do we retain your data**

As a general rule, we keep your information for a specified period of time from the date of when your contract ceases, and/or you cease to be a customer. Typically, the length of time we hold your data depends on a number of factors including the following:

- The type of data we hold about you
- The purpose for which the data is collected
- The time required under Regulatory rules
- The type of product we have provided
- The handling of complaints
- Legal claims

For more information in this regard, please do not hesitate to contact the Company at the address provided in Section 14 "How to contact us and/or our Data Protection Officer" of this Privacy Notice.

## **9. Implications of not providing information**

If you do not provide the necessary information required by us to process your application, we will not be able to:

- Process your application for a financial product or service;
- Provide the requested products or services and fulfil our contract with you;
- Continue to provide and/or renew existing products or services.

We will seek your consent when we request information which is not a contractual requirement or is not needed to comply with our legal obligations.



## 10. Legal Basis for using your data

We will use your data and share that data where:

- Its use is necessary in relation to a service or contract that you have entered into or because you have asked for something to be done so you can enter into a contract with us;
- Its use is necessary for us to comply with a legal obligation;
- You have explicitly consented to the use of your data in a specific and clear manner;
- Its use is necessary to protect your “vital interests” in exceptional circumstances;
- Its use is in accordance with our legitimate interests e.g. to manage our business, subject to those interests not overriding your fundamental rights and freedoms.

Personal information is held and used to:

- Process your application
- Issue your policy
- Make and receive payments
- Provide you with information about your policy
- Administer your policy and pay benefits
- Provide customer care and service
- Contact you to inform you of any relevant actions you may need to take with regard to on your policy

We also collect and use personal information about agents, brokers and financial advisers to service their agency contracts with us.

We use your information to comply with legal obligations such as:

- Reporting to regulators
- Keeping proper books and records
- Actuarial analysis and risk management to ensure the company stays financially sound
- Compliance with Anti-Money Laundering Laws. We screen all customers against Financial Sanctions and Politically Exposed Persons (PEP) lists



- To keep you up-to-date on your policy using your contact details
- To identify the target market for our regulated products and services, which we are required to do as a regulated product producer.
- We transmit personal data relevant to a competent authority in order to indicate possible crimes or threats to public safety.

## Legitimate interest

We use your personal information for our legitimate interests as shown below. This does not affect any of your privacy rights. We have reviewed any privacy risks and ensured that your data protection rights are not affected. If you have any questions in this regard, please contact the Company at the address as set out in Section 14 "How to contact us and/or our Data Protection Officer" of this Privacy Notice.

### Statistical Analysis

- We combine and group personal information for analysis to help us understand our customers and develop better products and services;
- We use summary information to help promote our products and services.

For internal administrative purposes:

- We use your personal data in order to conduct the appropriate checks to avoid the risk of payment in favour of a person other than the legitimised person;
- We process data for fraud prevention purposes (verifying the authenticity of data, and prevention of fraud risk).

## **11. Where is your data stored?**

Your data is stored on systems within Octium Life's premises and with providers of information storage. In some cases, we transfer information about you and your products and services with us to our services providers and other organisations outside the European Economic Area (EEA). We will always take steps to ensure that any transfer of data outside the EEA is carefully managed to protect your privacy rights.



## **12. How to exercise your data rights and the right to object.**

You have several rights in relation to how we use your data as follow:

- You can find out how we use your data, access your data and receive copies of it;
- You can have inaccurate/incomplete information about you corrected and updated;
- You can object to particular uses of your data for our legitimate interests;
- You can, in certain circumstances have data deleted or the use of your data restricted;
- You can, in certain circumstances have the right not to be subject to solely automated decisions and where such automated decisions have been made, have the right to have a person review the decision;
- You can exercise the right to data portability;
- You can withdraw consent at any time where processing is based solely on your consent.

If you wish to exercise any of your data rights, contact us, in writing, at the Company address provided in Section 14 "How to contact us and/or our Data Protection Officer" of this Privacy Notice. If you make your request electronically, we will try to provide you with the relevant information electronically. The Company reserves the right to verify your identity by requesting that you send us an identification document or different suitable documentation for this purpose (for example through the confirmation of personal data held by the Company).

The Company also reserves the right to request clarification on the request received, in order to ensure fast and targeted assistance.

## **13. Complaints**

If you think that the Company has processed your personal data incorrectly, please contact us at the Company address provided in Section 14 "How to contact us and/or our Data Protection Officer" of this Privacy Notice.

If you are unhappy with how we have handled your privacy rights, you can complain to the Data Protection Commissioner or another supervisory authority. The contact details of the Office of the Data Protection Commissioner are:





Telephone: +353 (0) 761 104 800 or +353 57 8684 800

Fax: +353 57 868 4757

E-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)

Postal Address:

Data Protection Commissioner

Canal House

Station Road

Portarlinton

R32 AP23

Co. Laois

Ireland.

#### **14. How to contact us and/or our Data Protection Officer**

If you have questions about how we use your information, you can reach our Data Protection Officer by email at [DataProtectionOfficer@Octium.ie](mailto:DataProtectionOfficer@Octium.ie) or write to:

Data Protection Officer

Octium Life DAC

1st Floor College Park House

South Frederick Street

Dublin 2

Ireland.

#### **15. Updates**

We may update our Data Privacy Notice from time to time. Any updates will be made available online and, where appropriate, notified to you by post.

