

## Privacy Policy

Universal Life Insurance Public Co Limited (hereinafter referred to as “the Company”) with a registered office at 85 Digenis Akritas Avenue, 1070 Nicosia is committed to protect your personal data within the provisions of the European Union Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data, General Data Protection Regulation, (hereinafter referred to as “the Regulation”).

The Regulation came into force on May 25, 2018. Until that time, the Processing of Personal Data (Protection of Individuals) Law of 2001 (Law 138(I)/2001) 2001 to 2012 was in force and has since been repealed by the Law Providing for the Protection of Natural Persons with Regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018) (hereinafter referred to as "the Law").

The Company is committed to protecting your personal data. This Privacy Policy describes how we collect and use your personal data, as well as your rights and control over them in connection with the Company Website and the U Connect application.

For any questions or further information regarding the processing of your personal data you can contact our Data Protection Officer, by mail at Digeni Akrita Avenue, Nr. 85, 1070 Nicosia, or by telephone at 22882212, or by email at [DataProtectionOfficerUL@unilife.com.cy](mailto:DataProtectionOfficerUL@unilife.com.cy).

As the website is often updated and new technologies are implemented and the Company's online services are improved, the Privacy Policy will be updated accordingly. Therefore, it is important for every user to consult this page from time to time and read the Privacy Policy for any updates.

### 1. Definitions

**‘Controller’** means Universal Life Insurance Public Co Limited which determines the purposes and means of the processing of personal data of the website and/or U Connect users.

**‘Data subject’** means an identified user of the website and/or the U Connect application or an identifiable user of the website and/or the U Connect application whose personal data are being processed.

**‘Personal data’** means any information relating to an identified or identifiable website and/or U Connect user. An identifiable website and/or U Connect user is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**‘Special category personal data’** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**‘Processing’** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

'Processor' means Universal Life Insurance Public Co Limited and any other natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

## 2. Type of Collected Data

As part of the Company's activities and services, we may collect the following personal data:

- i. Information that is automatically recorded by cookies on our website and/or U Connect application, including anonymous data for demographic purposes.
- ii. The information you have provided to the Company in the context of providing insurance coverage (e.g. full name, ID number, etc.).
- iii. The information you have provided in the context of any Company customer service process.
- iv. Collection of relevant demographics in case of your participation in surveys and/or questionnaires that may be compiled through our website and/or otherwise.
- v. The information you have provided in the context of using any of the Company's online platforms and/or applications.

## 3. Purpose of Processing

The Company will process the data for one or more of the following purposes:

- Issue and management of an insurance contract ("the Contract") which includes inter alia, assessment and acceptance of risks, premium calculation, collection of premiums, interest and loan installments or any other obligations, claims processing, loan applications processing, reinsurance, assignment to other organizations and/or any other related activity.
- Research and/or statistical analysis

## 4. Legal basis for processing personal data

The Company takes all appropriate organisational and technical measures for data security and protection in accordance with the Law for one or more of the following reasons:

- **For the Performance of a Contract** – we process personal data in order to perform our services based on the contracts with you and to be able to complete our acceptance procedure so as to enter into a contract with prospective customers. In addition, depending on the type of insurance, the processing of the data is covered by the relevant terms and conditions of each insurance policy.
- **Consent** – We process your personal data and especially your sensitive special category data only when you give us your specific consent for processing (unless the processing is necessary for the compliance with legal obligations or contract performance).

- **Compliance with Legal Obligations** – As an insurance company, we need to comply with certain legal and regulatory requirements arising, for example, from the Insurance and Reinsurance Services and Other related Matters Law, the Taxation Law and the Prevention and Suppression of Money Laundering Activities Law. In addition, the rules and directives of supervisory authorities, such as the Superintendent of Insurance, should be applied.
- **Safeguarding Legitimate Interests** – We process personal data so as to safeguard the legitimate interests pursued by us or by a third party without affecting your rights. . Examples of such processing activities include:
  - Internal policies and procedures we follow to enhance the integrity, availability and confidentiality of our Information Systems.
  - Measures to ensure system security and safeguarding of the assets of the Company for preventing criminal and/or malicious activities and/or offences.
  - Procedures for risk management of the Company.
  - Protection and defense of the Company's rights in all kinds of legal proceedings.
  - Surveys and statistics for the smooth operation and improvement of the Company.

## **5. Recipients of your personal data**

The recipients of data are the authorized personnel of the Company and any party that has a contractual agreement with the Company which maintains satisfactory confidentiality protection measures and levels of processing security. The recipients may also be doctors who have examined or will examine you as well as the competent staff of their clinics/private offices, your insurance intermediary who has a contractual agreement with the Company and the competent staff of any reinsurance company that has a contractual agreement with the Company.

As a customer of the Company you have the right at any time to request the details of the recipients of your personal data.

## **6. Transmission of your personal data**

For the purposes of processing your personal data, as set out above, the Company may transmit the personal data to other countries inside and/or outside the EU in cases involving, for example, reinsurance, payment of a claim and/or in instances where you have given us your consent to do so. Such transfers shall take place within the framework set by the Regulation and the Law and following the necessary notifications to the competent authorities.

## **7. How long we keep your personal data for**

We will keep your personal data for as long as we have a contractual relationship with you. Once our contractual relationship with you has ended, we may keep your data if we cannot delete it for legal or regulatory or reasons for which you will be informed immediately upon the completion of your contractual relationship with the Company.

## **8. Your data protection rights**

You may exercise the following rights, as appropriate, by writing to [personaldata@unilife.com.cy](mailto:personaldata@unilife.com.cy) or by visiting any of our branches or through your insurance intermediary.

- Right of Access - this enables you to obtain a copy of the personal data you have provided the Company.
- Right to Rectification (Correction) – this enables you to have any incomplete or inaccurate personal data the Company holds about you corrected.
- Right to Data Portability – this enables you to receive a copy of your personal data in a format that is structured and commonly used and transmit such data to other organizations. You also have the right to have your personal data transmitted directly by us to other organizations you will name.
- Right to Restriction of Processing – this enables you to request the restriction of processing your personal data, where one of the following applies:
  - it is not accurate
  - it has been used unlawfully
  - it is not relevant any more, but they are required for the establishment, exercise or defense of legal claims
  - you have already asked us to stop using your personal data but you are waiting our confirmation for any legitimate grounds to use your data
- Right to Erasure (to be forgotten) – this enables you to request the deletion of your personal data when there is no legally valid reason to continue processing.
- Right to Object – this enables you to object to processing your personal data for direct marketing purposes, including profiling.
- Right to Withdraw the Consent – this enables you to withdraw the consent you gave us with regard to the processing of your personal data at any time, without affecting the lawfulness of processing based on consent before it was withdrawn or revoked by you. However, exercising this right will result in the termination of your Insurance Policy.

Please note that some of the abovementioned rights may be restricted, for example, when we have an overriding legal interest and/or legal obligation to continue the processing of personal data and/or where data may be excluded from disclosure due to legal/professional privilege, and/or obligations of professional secrecy.

### **9. Automated decision making**

At this stage, there is no automated decision-making or profiling process in the execution of the contract between you and the Company.

### **10. Right to lodge a complain**

If you have exercised any or all of your data protection rights and still feel that your concerns about how we use your personal data have not been adequately addressed by us, please contact our Data Protection Officer by phone: 22882212, or by email: [DataProtectionOfficerUL@unilife.com.cy](mailto:DataProtectionOfficerUL@unilife.com.cy).

You also have the right to complain to the Office of the Commissioner for Personal Data Protection. You can find more information on how to submit a complaint from their website at <http://www.dataprotection.gov.cy>.

### **11. Website Cookies**

Cookies are small files stored in your browser history. They do not contain personal information and using them does not provide access to your computer assets or files. The purpose of using cookies is to notify the website and/or U Connect about the user previous activity. We commonly use cookies in order to store information anonymously and analyze our website and/or U Connect performance.