

# PRIVACY NOTICE

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At AIB Gruppe, we are committed to protecting the privacy of your data. This Privacy Notice explains how we do this, as well as letting you know about your rights in relation to the data.

## 1. AIB Gruppe

AIB Gruppe offer a broad range of life assurance, pensions and investments products. We collect, use and share personal data so that we can provide you with products and services as a data controller.

What personal data is collected, how your personal data is used and shared and your rights in relation to that data is explained in this Privacy Notice. We will direct you to this Privacy Notice when we collect personal data from you, for example, when you apply for one of our products. Please read the Privacy Notice carefully, as it will explain how we are responsible for managing your personal data and includes specific information about how we will use your personal data in relation to products and services that we provide to you.

## 2. WHAT IS A PRIVACY NOTICE & WHY IS IT IMPORTANT?

We know that your personal data is important to you and it is important to AIB Gruppe too. This Privacy Notice tells you what we use your personal data for and explains your rights around how we use it.

If you give us personal data about someone else, please make sure you have their permission and make them aware of this Privacy Notice, as it also applies to them.

## 3. WHAT PERSONAL DATA WE COLLECT AND WHY?

We use personal data to provide our policies, service our customers, assess claims and pay benefits.

Personal data needed to provide our policies is held and used to:

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



## 4. LAWFUL BASIS OF PROCESSING

We must have a lawful basis to collect and use personal data. This is explained below:

### NEEDED FOR YOUR CONTRACT

We need to collect and use your personal data to provide your policy contract. This includes data such as your name, date of birth, contact and bank account details. We will ask for other data depending on the policy type and this can include health, employment, pension and salary data. We restrict access to, and use of, any sensitive personal data. We also create new personal data such as your policy value and benefits.

### REQUIRED BY LAW

We use your personal data to comply with law and regulations:

- » Reporting to regulators;
- » Actuarial analysis and risk management to ensure the company stays financially sound.

We carry out internal reporting, quality checking, compliance controls and audits to help meet these obligations.

- **Anti-Money Laundering**

We must collect certain personal data to comply with Anti-Money Laundering obligations. This depends on your policy type but includes up to date proof of identification and address. We also screen all customers against Financial Sanctions, Politically Exposed Persons (PEP), Special Interest Persons (SIP) and Relatives and Close Associates (RCA) lists. To do this, we use your name, date of birth, address, nationality and occupation data.

Where needed, we carry out searches of publicly available information.

- **Tax**

You must give us your tax residence information, tax identification number (TIN) or Personal Public Service Number (PPSN) for tax reporting.

- **Information**

Under regulations we must give you information and updates on your policy. To do this, we use your policy and contact details.

When you give us your personal information we will check to see if we already have a record of you. This helps us to comply with your Data Protection rights. Please see section 10 of this Privacy Notice.



- **Liability/Target Market**

We must keep and use your relevant personal data to calculate the death and disability liability for other policies like yours.

As a regulated product producer, we must use our customer personal data, including yours, to identify the target market for our regulated products and services.

The type of personal data that is required by law may vary in the future.

## **LEGITIMATE INTEREST**

We use your personal data for our legitimate interests as shown below. This doesn't affect your privacy rights. We have taken account of any privacy risks and have ensured that your data protection rights are not affected. We believe these uses benefit our customers. You can contact us if you have any questions using the details in section 11 of this Privacy Notice.

- **Call Recording**

Calls are recorded for staff training and monitoring, as well as maintaining a record of customer transactions we complete over the phone.

We also save the number you're calling from to help us handle your call and direct you to the most suitable team. This includes calls through landline, internet or mobile. We will let you know if a call is being recorded at the start of the call so you can decide to continue or not.

- **Sharing With Your Intermediary/Financial Advisor**

We recommend that all our customers get financial advice to make sure their policy suits their needs. We share your personal data with your intermediary/financial adviser and keep them up to date on your policy. This allows them to provide a better service to you.

- **Sharing with Other Insurers**

If you told us you have similar cover in place with other insurers for certain policies we will validate that data with the other insurer(s). If you tell other insurers about similar cover you have in place with us for certain policies we will confirm this data to other insurers.

- **Customer Queries and Service Requests**

When you send us a query or request a service, such as a call back or webchat, we will collect and use the personal details needed to respond to your request.

- **Statistical Analysis**

We combine and group personal data for statistical analysis to help us understand our customers, to develop better products and services and to help promote our products and services. Statistical analysis uses aggregate data and individuals are not identifiable.



- **Data Analytics**

We perform data analytics on our products and customers to allow us to understand how our customers interact with us, what products and services customers avail of and to develop new products and services. Aggregate reports are used for these purposes where individuals are not identifiable. Data analytics to provide insights at individual customer level will include personal data, but not special category data such as medical data.

- **Safety And Security**

We capture and hold data from email, web and network traffic to monitor and protect information security and to support investigation around cyber or data loss events (e.g., a malicious act – virus or hacking).

If you visit our offices CCTV may be in operation for safety and security reasons. We only hold these recordings temporarily and for longer if we need to for safety and security investigations.

## **WITH YOUR CONSENT**

You need to give consent for us to collect and use certain personal data or for certain uses of your personal data.

You are given the choice to provide consent, or not. When we collect your consent, we will explain what we need it for and how you can change your mind in the future.

- **Automated-Decision Making, Including Profiling**

We have an automated decision-making system for underwriting. This is designed to improve efficiency, reduce costs, improve quality and provide consistent underwriting decisions. This system determines underwriting acceptance and the terms we can offer. Acceptance and terms are based on set risk criteria agreed between AIB Gruppe and our reinsurers.

You will be asked to provide consent for automated underwriting decisions to be made about you. You can ask to have a person review and make the final underwriting decision.

## **5. CONSENT AND HOW TO WITHDRAW CONSENT?**

If we process your personal data based on consent, you have the right to withdraw that consent at any time. The opt-out methods will depend on how the consent was collected and will be explained when you give us your consent, e.g., automated underwriting.

You will also be able to withdraw consent by contacting us directly using the details in section 11 of this Privacy Notice.

## 6. HOW AND WHERE DO WE GET YOUR PERSONAL INFORMATION FROM?

You provide us with your personal data directly when you contact us, complete our forms, use our on-line digital services to speak with us or visit our website and mobile app.

We receive personal data from your intermediary/financial advisor when you apply for one of our products.

We also get personal data from solicitors, licenced private investigators, employers, trustees or regulators (where relevant).

If you are the person insured under a protection policy, we will get relevant personal health data from your health professionals (including, GPs, consultants, hospitals, medical screening companies).

We will check if you have similar cover or claims already in place with other insurers for certain policies in line with Revenue rules.

## 7. WHO DO WE PASS YOUR PERSONAL INFORMATION TO?

We pass personal data, including personal health data if necessary, to:

- **Data Processors**

Companies that act as service providers under contract with us and only process your personal data as instructed by us. Your personal data is transferred securely and is not used by other parties for any other reason. The categories of services that we use other Data Processors for include: document management, administration, underwriting, customer services, actuarial services, sanctions screening and mobile app services.

- **Financial Advisors**

Financial Advisors who you have chosen to act as your intermediary/financial advisor to give service and advice on your policy, including for policy data feeds (sales reporting, propensity modelling), claims handling, complaints, monitoring and training, legal proceedings, regulatory reviews and investigations.

Financial Advisors who your Employer or Trustee has chosen if you are a member of a group policy to act as an intermediary to give service and advice on the group or company policy.

- **Trustees**

Appointed in connection with the policy contract.

- **Employers**

Where your policy has been set up through your employer, we will share data with them to the extent that is required in order to administer the group or company policy.

- **Health Professionals (including, GPs, consultants, hospitals, medical screening companies)**

Where needed for underwriting and paying benefits.

- **Reinsurers**

That we have a contract with to underwrite our policies and claims.

- **Licensed Private Investigators**

We may engage private investigators where it is necessary and proportionate to do so for our legitimate interests in tracing beneficiaries, identifying and reducing fraud, and where required, for good claims management. This is conducted in line with the Private Investigators Code of Practice.

- **Regulators**

Regulators and the Revenue Commissioners or as needed to comply with regulations and laws.

- **Third Parties for Digital Advertising and Marketing:**

Your online activity will be shared with third party providers where you consent to marketing cookies.

## **8. DO WE TRANSFER YOUR PERSONAL INFORMATION OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)?**

Your personal data is generally processed and stored within the EEA. Some of our service providers and data processors are global companies who may transfer data outside of the EEA such as for service support.

Passing your personal data to certain countries, including the UK, is allowed under an adequacy decision made by the EU Commission. Where we, our service providers, or our data processors, transfer your personal data outside the EEA, or to a country outside the EEA that does not have an adequacy decision in place, we will take steps to ensure that your personal data is adequately protected and transferred in line with data protection law.

## **9. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?**

We keep and use your personal data for as long as you have a relationship with us. We also hold it after this where we need to for complaints handling, legal claims, for system back-ups and for as long as we are required to under regulations.

We will let you know how long we keep personal data for when you avail of a single or specific service such as a quote or call-back on our website.

## 10. WHAT ARE YOUR RIGHTS?

You have a number of rights over your personal data which you can exercise free of charge by contacting us using the details in section 11 of this Privacy Notice. You will need to give us information to help us identify you and we will respond to you within one month in line with regulation. Any restrictions to your rights will be explained in our response.

- **Right to Data**

You have a right to the data set out in this Privacy Notice. The most recent version of our Privacy Notice will always be accessible on our website at [www.saolassurance.ie/legal/data-privacy-notice](http://www.saolassurance.ie/legal/data-privacy-notice). If we make changes to the type of personal data we collect and/or how we use it we will inform you of the changes via our website.

We have controls in place to protect your personal data and minimise the risk of security breaches. However, should any breaches result in a high risk for you, we will inform you without undue delay.

- **Right to Restrict or Object**

You can restrict or object to any unfair and unlawful collection or use of your personal data.

You can object to any automated decision making that has a legal or similar significant impact for you and ask for the decision to be made by a person.

You can withdraw consent and object to certain types of processing.

- **Right to Correct And Update**

You can ask us to correct and update personal data we hold about you.

Your AIB Gruppe policies are long term contracts and to provide you with the best service it is important we have your up to date personal data, such as contact details.

- **Right to Delete And Be Forgotten**

You can have your personal data deleted if it is incorrect, if it is no longer needed or has been processed unfairly or unlawfully. If you have withdrawn consent you can ask for your personal data to be deleted.

We will keep a record of your request so we know why your personal data was deleted.

If we have provided a regulated product or service to you, we must keep your personal data for a minimum period by law.

- **Right to Portability**

You can ask for a copy of all personal data that you gave us (including through your interactions with us), and which we hold in an automated format. You can receive this in a machine readable format that allows you to keep it.

You may also request AIB Gruppe to send this personal data in a machine readable format to another company. The format will depend on our ability to provide this in a secure way that protects your personal data.

It is unlikely we will be able to use a copy of your personal data sent to us in this way. This is because we can only collect personal data that we need. We also need your most up to date personal data for underwriting and to comply with regulations.

- **Right to Access**

You have the right to know what personal data we hold about you and to receive a copy of your personal data.

**WE MUST TELL YOU:**





- » Why we hold it;
- » Who we pass it to, including whether we transfer it outside the EEA;
- » How long we keep it for;
- » Where we got it from; and
- » If we carried out any automated-decisions, and if so, the logic behind it and what it means for you.

This right does not allow you access personal data about anyone else.

To access your personal data please write to us or email us using the contact details in section 11 of this Privacy Notice. To help us respond as quickly as possible, please let us know if you are only looking for copies of specific personal data.


## 11. HOW TO CONTACT US

You can contact us with any questions about your personal data and this Privacy Notice:

-  AIB Gruppe, PO Box 8172, Blackrock, Co. Dublin,
-  Ireland +35316670233| Monday-Friday,
-  08:00-18:00 [hello@aibgruppe.com](mailto:hello@aibgruppe.com)
-  <http://www.aibgruppe.com>

## 12. DATA PROTECTION OFFICER

AIB Gruppe also has a Data Protection Officer who you can contact directly:

-  Data Protection Officer, AIB Gruppe, PO Box 8172, Blackrock, Co. Dublin,
-  Ireland [dpo@aibgruppe.com](mailto:dpo@aibgruppe.com)





## 13. COMPLAINTS

If you do not think that we have processed your personal data in line with this Privacy Notice, please contact us.

If you are not happy with how we have processed your personal data or handled your privacy rights, you can complain to the Data Protection Commission using the contact details below:

-  Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28
-  +353 1 667 0233 +44 20 8040 4290
-  [dpo@aibgruppe.com](mailto:dpo@aibgruppe.com)

This Privacy Notice is effective from 1<sup>st</sup> February 2024.