



IRISH LIFE ASSURANCE PLC PRIVACY NOTICE

1. WHAT IS A PRIVACY NOTICE & WHY IS IT IMPORTANT?

We know your personal information is important to you and it is important to Irish Life too. This Privacy Notice tells you what we use your personal information for and explains your rights around how we use it. Please read this Privacy Notice to understand how and why we use your personal information.

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

2. WHAT PERSONAL INFORMATION WE COLLECT AND WHY

We use personal information to provide our plans, service our customers, assess claims and pay benefits. We must have a lawful basis to collect and use personal information. This is explained below:

NEEDED FOR YOUR CONTRACT:

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

Personal information needed for plan contracts is held and used to:

- process your application;
- issue your plan;
- make and receive payments;
- provide you with information about your plan;
- administer your plan and pay benefits;
- provide customer care and service; and
- contact you to inform you of any relevant actions you may need to take.



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

REQUIRED BY LAW:

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

- reporting to regulators;
- keeping proper books and records; and
- 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.

We must collect certain personal information to comply with Anti-Money Laundering law. This depends on your plan type but includes up to date proof of identification and address. We also screen all customers against Financial Sanctions and Politically Exposed Persons (PEP) lists. To do this, we use your name, date of birth, address, nationality and occupation information.

Where needed we carry out searches of publicly available information. You must give us your tax residence information and tax identification number for tax reporting.

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

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

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

If you get financial advice from one of our tied agents, you must give personal and financial information for your current and future needs to be assessed. This enables the tied agent to recommend the most suitable financial product for you. This also involves creating new and inferred personal information about you. The tied agent has to do this analysis of you, using your personal information, to comply with regulations.

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 8 of this Privacy Notice.

If you visit our offices we will record CCTV footage for safety and security reasons. We only hold these recordings temporarily and for longer if we need to for safety and security investigations.

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

IRISH LIFE LEGITIMATE INTEREST:

We use your personal information 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 9 of this Privacy Notice.

- **Call Recording:**
 - For customer service, we record and monitor calls. We 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 Broker or Financial Adviser:**
 - We recommend that all our customers get financial advice to make sure their plan suits their needs. We share your personal information with your broker or financial adviser and keep them up to date on your plan. This allows them to give you better advice.
- **Statistical Analysis:**
 - We combine and group personal information for analysis to help us understand our customers and develop better products and services.
 - Personal information from other companies within the Irish Life Group may also be used for this purpose.
 - We use summary information to help promote our products and services.

- **Sharing with Other Insurers:**
 - If you told us you have similar cover in place with other insurers for certain plans we will validate that information with the other insurer(s). If you tell other insurers about similar cover you have in place with us for certain plans we will confirm this information to other insurers.
- **Customer queries and service requests:**
 - When you send us a query or request a service, such as a call back, we will collect and use the personal details needed to respond to your request.
- **Customer verification with other companies in the Irish Life Group:**
 - We maintain a record of plans you hold with certain Irish Life Group companies using personal information such as your name and contact details in order to provide real-time access to certain services you agree to.

WITH YOUR CONSENT:

You need to give consent for us to collect and use personal information classed as sensitive or for certain uses of your personal information. 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 Irish Life 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.

- **Biometric Data:**

- Where you have consented we will collect information to identify you through voice, facial or fingerprint recognition technology.

- **Direct Marketing:**

- We would like to be able to contact you about offers and services from across our group of companies, separately from your plan communications. We will only send you direct marketing content where we have your consent.

- **Cookies:**

- When you visit our website we will use cookies to tell us whether you have visited our website before. We also use cookies for third party advertising to show you Irish Life ads where you have visited our website before or visited other websites offering similar products and services. We will ask for your consent to use these once you visit the website.

- **Mobile App Software Development Kits (SDK):**

- When you register and use one of our mobile apps, we may use third-party software development kits ("SDKs") to collect information about how you are using the app. We use information on how you interact with the app to improve the usability of the app and to enable us to track the performance of our advertising. We will ask for your consent to use these when you register for one of our apps.

- **Sharing with Other Companies within the Irish Life Group:**

- If we wish to share your information with other Irish Life Group companies other than as set out elsewhere in section 2, we will explain why and seek your consent.

- **Advice from an Irish Life Tied Agent:**

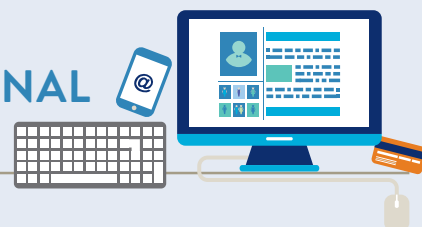
- Where you get advice from one of our tied agents you consent to giving your personal information for that advice and any future advice service.

3. CONSENT AND HOW TO WITHDRAW CONSENT?

If we process your personal information 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. you can change your mind using the opt-out link in any direct marketing emails sent to you, or by opting out of a mobile app service.

You will also be able to withdraw consent by contacting us directly using the details in section 9 of this Privacy Notice.

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



You provide us with your personal information directly when you contact us, complete our forms, speak with us or visit our website, social media accounts and mobile apps. For more information on what personal information is collected and used on our website please see our Website Privacy Policy and Cookies Policy at www.irishlife.ie/cookies-policy

We also get personal information from agents, brokers, financial advisers, solicitors, licenced private investigators, employers or regulators (where relevant).

If you are the person insured under a protection plan, we will get relevant personal health information from your health professionals. If we have accepted your cover based on a proposal and underwriting decision with another insurer we will get relevant personal information and personal health information from that insurer in order to process any claims.

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

We also create new personal information about you based on information you have given us and through your interactions with us such as noting your online preferences.

5. WHO DO WE PASS YOUR PERSONAL INFORMATION TO?

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



- **Data processors:**
 - Companies that act as service providers 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. Our three main Data Processors are Irish Life Financial Services Ltd, Irish Life Group Services Ltd, and Canada Life Group Services Ltd. The categories of services that we use other Data Processors for include: document management, administration, underwriting, customer services, marketing, actuarial services, Financial Sanctions, PEP screening and mobile app services.
- **Brokers or Financial Advisers:**
 - who you have chosen to act as your intermediary to give service and advice on your plan.
- **Irish Life Tied Agents:**
 - who you have chosen as your adviser to give service and advice on your plan.
- **Trustees:**
 - appointed in connection with the plan contract.
- **Health Professionals:**
 - where needed for underwriting and paying benefits.
- **Reinsurers:**
 - that we have a contract with to underwrite our plans and claims. You can see our current panel of reinsurers on our website at www.irishlife.ie/reinsurers
- **Investment Service Providers:**
 - We pass limited personal information to investment service providers where you want to access these services through your plan e.g. Stockbroker or Online Trading Platform.
- **Licensed Private Investigators:**
 - We engage private investigators to trace beneficiaries, identify and reduce fraud, and for good claims management. This is carried out in line with the Private Investigators Code of Practice.
- **Regulators:**
 - Regulators and the Revenue Commissioners or as needed to comply with regulations and laws.
- **Other Insurers:**
 - For assessing claims if we accepted your cover based on a proposal and underwriting with another insurer.
 - For checking if you have similar cover or claims in place for certain plans in line with Revenue rules.
- **Other Companies:**
 - We pass your personal information to third parties, including other companies within the Group, where we have a lawful basis to do so.

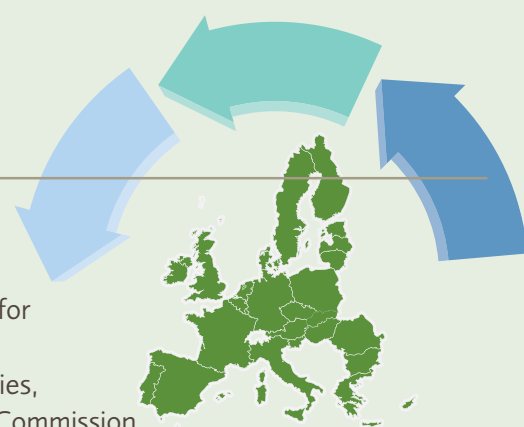
6. DO WE TRANSFER YOUR PERSONAL INFORMATION OUTSIDE OF THE EU?

Your personal information is processed and stored within the EU. However we do pass personal information securely to our parent company Great-West Lifeco in Canada. We do this for administration purposes, for recording of legal claims and for screening our customers against Financial Sanctions and PEP lists to comply with Anti-Money Laundering rules. Passing your personal information to certain countries, including Canada, is allowed under an adequacy decision made by the European Commission.

Our parent company, Great-West Lifeco has a legal obligation to maintain a list of our identified high-risk customers.

Where we, or our data processors, transfer your personal information outside the EU, we will take steps to ensure that your personal information is adequately protected and transferred in line with data protection law.

We process and store data in the UK, which at the date of drafting, is within the EU. Should the UK leave the EU, we are likely to continue to process and store data in the UK either in line with any agreement reached between the UK and the EU for such process and storing, or under other available legal means permissible for transfer to non-EU countries.



7. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We keep and use your personal information 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 have to under regulations.

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



8. WHAT ARE YOUR RIGHTS?

You have a number of rights over your personal information which you can exercise free of charge by contacting us using the details in section 9 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 Information**

You have a right to the information set out in this Privacy Notice. The most recent version of our privacy notice will always be accessible on our website at www.irishlife.ie. If we make changes to the type of personal information we collect and / or how we use it we will inform you of the changes.

We have controls in place to protect your personal information and minimize 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 information.

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, for example direct marketing.



- **Right to Correct and Update**

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

Your Irish Life plans are long term contracts and to provide you with the best service it is important we have your up to date personal information, such as contact details.

- **Right to Delete and Be Forgotten**

You can have your personal information 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 information to be deleted.

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

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

- **Right to Portability**

You can ask for a copy of all personal information 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 Irish Life to send this personal information 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 information.

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

- **Right to Access**

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

We must tell you:

- why we hold it;
- who we pass it to, including whether we transfer it outside the EU;
- 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 to access personal information about anyone else.

To access your personal information please write to us or email us using the contact details in section 9 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 information.

9. HOW TO CONTACT US

You can contact with any questions about your personal information and this privacy notice:

Address: Irish Life Assurance
Irish Life Centre
Lower Abbey Street
Dublin 1

Telephone: +353 (0) 1 704 1010

Email: dataprotectionqueries@irishlife.ie

Website: www.irishlife.ie



10. DATA PROTECTION OFFICER

Irish Life Assurance also has a Data Protection Officer who you can contact directly:

Address: Irish Life Data Protection Officer
Irish Life Assurance
Irish Life Centre
Lower Abbey Street
Dublin 1

Telephone: +353 (0) 1 704 1969

Email: ILADPO@irishlife.ie



11. COMPLAINTS

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

If you are not happy with how we have processed your personal information or handled your privacy rights, you can complain to the Data Protection Commission by contacting them below:

Address: Data Protection Commission,
Canal House,
Station Road,
Portarlinton,
Co. Laois, R32 AP23

Telephone: +353 761 104 800

LoCall: 1890 252 231

Email: info@dataprotection.ie

This Privacy Notice is effective from April 2019.

Irish Life Assurance plc is regulated by the Central Bank of Ireland.
