

PERSONAL DATA IN UNUM ŻYCIE

INFORMATION REGARDING PROCESSING OF PERSONAL DATA IN CONNECTION WITH INSURANCE COVERAGE

WHO IS THE CONTROLLER OF MY PERSONAL DATA AND THE CONTACT PERSON?

1. The controller of your personal data is Unum Życie Towarzystwo Ubezpieczeń i Reasekuracji Spółka Akcyjna with registered office in Warsaw, Poland: at ul. Łucka 9, 00-842 Warszawa (hereinafter referred to as „Unum”). Data controller can be contacted via e-mail address: kontakt@unum.pl, via a contact form at: www.unum.pl; by telephone: +48 800 33 55 33; or in writing to the address of Unum registered office.
2. In all matters related to personal data processing, in particular, your rights associated with personal data processing, you may contact the Data Protection Officer designated in Unum via e-mail address: iod@unum.pl; via a contact form at: www.unum.pl; by telephone: +48 800 33 55 33; or in writing to the address of Unum registered office (preferably with a note reading „GDPR”/„RODO”).

PURPOSE AND SCOPE OF PERSONAL DATA PROCESSING

3. Your personal data can be processed by Unum as follows:

PURPOSE	LEGAL BASIS
Life insurance contract conclusion, including underwriting procedure; and contract performance, including premium indexing and claim payment.	Compliance with legal obligations Unum is subject to; processing required for contract conclusion and performance; declaration of consent for the processing of personal data concerning health.
Reinsurance of insurance risks.	Protection of Unum legitimate interests (i.e. risk mitigation under a life insurance contract); declaration of consent for the transfer of personal data concerning health to the reinsurer.
Ensuring compliance with legal obligations related to counteracting money laundering and financing of terrorism.	Compliance with legal obligations Unum is subject to in the field of counteracting money laundering and financing of terrorism.
Ensuring compliance with legal obligations related to reporting obligations under the agreement between the government of the Republic of Poland and the government of the United States of America (FATCA) and automatic exchange of tax information with other countries.	Compliance with legal obligations Unum is subject to in relation to international tax provisions and FATCA, as well as the provisions on automatic exchange of tax information with other countries.
Ensuring compliance with legal obligations related to insurance laws and regulations, in particular, as regards risk management and reporting requirements.	Compliance with legal obligations Unum is subject to in relation to insurance and reinsurance business provisions.
Ensuring compliance with legal obligations related to other laws and regulations in Poland and the European Union.	Compliance with legal obligations Unum is subject to in relation to tax and accounting regulations.
Insurance fraud prevention.	Protection of legitimate interests of Unum and other insurance companies (i.e., counteracting the cases of insurance fraud).
Exercise or defense of claims under life insurance contract.	Protection of Unum legitimate interests (i.e. exercise or defense of claims).
Direct marketing of insurance products and services and other financial products and services (i.e., receiving Unum product and service offers).	Protection of Unum legitimate interests (i.e., marketing the offer of insurance products and services and other financial products and services) and, additionally, the declaration of consent regarding electronic and telephone communication channels.

4. Personal data processing carried out by Unum includes the so-called profiling. Profiling is defined as follows:
 - Based on information acquired at the stage of life insurance contract conclusion (personal data concerning health included), underwriting is carried out by Unum, resulting in a decision to provide (or not) insurance coverage and to conclude insurance contract with a rated premium or, for example, with modified terms and conditions that deviate from the general terms and conditions of insurance;
 - Based on information regarding client’s insurance products (but without personal data concerning health), Unum Life develops client preference portfolios in order to match the offer of insurance products and services and other financial products and services with identified or projected needs and expectations of individual customers.

The above-said personal data processing is not fully automated by Unum, which means that in each case human participation in such operations is ensured, in particular in connection with a positive (or negative) underwriting decision.

FOR HOW LONG CAN PERSONAL DATA BE KEPT?

5. The period of storage of your personal data depends on the purpose for which the data is processed, and it is equivalent to:
 - As regards performance of a life insurance contract and exercise or defense of legal claims arising under life insurance contract – until those claims have expired (claim expiry date is provided for in the Civil Code, insurance law provisions);
 - As regards compliance with laws and regulations – until the underlying requirement has expired (e.g., accounting documents, including the data contained therein, must be stored for five years);
 - As regards direct marketing – until you have stated your objection or withdrawn a relevant declaration of consent.

WHO CAN PERSONAL DATA BE SHARED WITH?

6. Your personal data can be shared with the following entities:
 - Reinsurance companies including, inter alia, General Reinsurance AG based in Cologne (Germany) and RGA International Reinsurance Company Dac based in Dublin (Ireland) – in connection with risk reinsurance;
 - Other insurance companies – in connection with prevention of fraud against insurance companies and compliance with legal obligations Unum Life is subject to;
 - Organizations operating under the law (public authorities) including, inter alia, the Polish Financial Supervision Authority and the General Inspector of Financial Information – in connection with legal obligations Unum is subject to;
 - Organizations that provide services to Unum, including service providers in the field of medical services, IT services, legal and advisory services – in connection with provision of those services;
 - aid, care and medical services to service entities.

TRANSFER OF DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA

7. Personal data may also be transferred to certain subcontractors of IT system providers who are located in countries outside the European Economic Area for which the European Commission did not state an adequate level of personal data protection.
8. Therefore, the transfer of personal data to these entities takes place on the basis of an appropriate contract, containing standard contractual clauses adopted by the European Commission. You may receive a copy of this agreement – in this case, please contact the Data Protection Officer.

IS IT MANDATORY FOR ME TO PROVIDE MY PERSONAL DATA?

9. The decision to take insurance coverage is voluntary. However, provision of personal data in connection with life insurance contract is necessary for contract conclusion and its performance - without access to personal data, including personal data concerning health, such contract cannot be concluded or performed.
10. Provision of data for direct marketing purposes is voluntary – it does not have impact upon conclusion or performance of a life insurance contract.

RIGHTS IN THE AREA OF PERSONAL DATA PROCESSING

11. You have certain rights in connection with the processing of personal data, including: (i) the right to access your personal data; (ii) the right to rectify the data; (iii) the right to delete the data; (iv) the right to restrict processing of the data; (v) the right to transfer the data – in accordance with the rules set out in the provisions on personal data protection, including the EU Data Protection Regulation 2016/679 („GDPR”).
12. As regards the processing of your personal data based on performance of legitimate interest, you may object to the processing of your personal data, in particular as regards processing for direct marketing purposes.
13. As regards the processing of your personal data based on your declaration of consent, you may withdraw such consent at all times. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. The withdrawal of consent for the processing of personal data concerning health or for transfer of the personal data concerning health to the reinsurer may result in inability to perform the life insurance contract or inability to reinsure the risks.
14. You may file a complaint before the supervisory authority responsible for personal data protection oversight – the President of the Personal Data Protection Office.