

INFORMATION ON THE PROCESSING OF PERSONAL DATA IN CONNECTION WITH INSURANCE

WHO IS MY DATA CONTROLLER AND WHO CAN I CONTACT?

1. The Controller of your personal data is Unum Życie Towarzystwo Ubezpieczeń i Reasekuracji Spółka Akcyjna, with its registered office in Warsaw, at al. Jana Pawła II 17, 00-854 Warszawa [until 7 August 2024], and at ul. 9 Łucka, 00-842 Warszawa [from 8 August 2024 onwards] (hereinafter referred to as „Unum Życie”). Your data Controller can be contacted via e-mail: kontakt@unum.pl, using the contact form at: www.unum.pl, by telephone: +48 800 33 55 33 or in writing to Unum Życie registered address.
2. In all matters relating to the processing of your personal data such as, in particular, the exercise of your rights in relation to the processing of your personal data, you can contact the Data Protection Officer appointed at Unum Życie, via email: iod@unum.pl, using the contact form at: www.unum.pl, by telephone at: +48 800 33 55 33 or in writing to Unum Życie registered address (preferably with the note „RODO” [GDPR] on top).

THE UNDERLYING PURPOSE AND THE LEGAL BASIS FOR PERSONAL DATA PROCESSING

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

THE UNDERLYING PURPOSE	THE LEGAL BASIS
To have a life insurance contract concluded, incl. risk underwriting and contract performance, incl. premium indexation and benefit payment.	Legal and regulatory compliance (as applicable to Unum Życie); life insurance contract conclusion and performance; health data processing consent.
To have insurance risks reinsured.	The pursuit of Unum Życie legitimate interests (i.e., mitigating the risks of life insurance contract); consent to have the health data shared with the reinsurer.
To ensure legal and regulatory compliance with anti-money laundering and counter-terrorist financing legislation.	Compliance with anti-money laundering and counter-terrorist financing legislation (as applicable to Unum Życie).
To ensure legal and regulatory compliance with the agreement between the Government of the Republic of Poland and the Government of the United States of America (FATCA) and the provisions on the automatic exchange of tax information with other countries.	Legal and regulatory compliance with the provisions on international tax obligations and the implementation of FATCA legislation and the provisions on the automatic exchange of tax information with other countries (as applicable to Unum Życie).
To ensure legal and regulatory compliance with insurance laws, including risk management and reporting requirements.	Legal and regulatory compliance with insurance and reinsurance legislation (as applicable to Unum Życie).
To ensure legal and regulatory compliance with other Polish and EU laws.	Legal and regulatory compliance in the field of tax and accounting laws, <i>inter alia</i> (as applicable to Unum Życie).
To prevent insurance fraud.	The pursuit of legitimate interests of Unum Życie and other insurers (i.e., insurance fraud prevention).
To assert one’s claims and to defend oneself against claims arising in connection with a life insurance contract.	The pursuit of Unum Życie legitimate interests (i.e., assertion of claims and defence against claims).
To do direct marketing of insurance and other financial products and services (i.e., to ensure receipt of such products and services from Unum Życie).	The pursuit of Unum Życie legitimate interests (i.e., presentation of insurance and other financial products and services) and, in addition, the consent for the use of electronic and telephone communication channels.

4. When processing personal data Unum Życie does profiling, *inter alia*, which means that:
 - Using the information (health information included) collected at the stage of life insurance contract conclusion, Unum Życie underwrites the risk and takes the decision on coverage (positive or negative) and the applicable rating, e.g., on the terms that deviate from the general terms and conditions;
 - Based on the knowledge of the customer’s insurance portfolio (health information excluded), Unum Życie creates customer preference profiles in order to tailor its offering of insurance and other financial products and services to the known or anticipated needs and expectations of each customer.

Personal data processing by Unum Życie, as referred to above, is not completely automated, i.e., human involvement in such operations is ensured in each and every case, in particular in connection with the decision to provide (or not to provide) insurance cover.

HOW LONG CAN YOUR PERSONAL DATA BE STORED FOR?

5. Your personal data storage period depends on the underlying purpose of data processing, specifically:
 - If the data is processed in connection with life insurance contract conclusion and performance or the assertion of claims and defence against claims relating thereto – as per the statute of limitations for such claims (as prescribed in the Civil Code, insurance law);
 - If the data is processed for legal and regulatory compliance reasons – as long as required for such reasons (e.g., accounting documents, including the data therein, must be stored for 5 years);
 - If the data is processed in connection with direct marketing - until you object or withdraw the relevant consent.

WHO CAN BE A RECIPIENT OF YOUR PERSONAL DATA?

6. Your personal data may be received by the following entities:
 - Reinsurance companies, including General Reinsurance AG, Cologne, Germany, and RGA International Reinsurance Company Dac, Dublin, Ireland, in connection with risk reinsurance;
 - Other insurers - in connection with insurance fraud prevention and for legal and regulatory compliance reasons (as applicable to Unum Życie);
 - Insurance agents (Unum's Life Protection Advisors) - in connection with the distribution of Unum Life insurance products and services;
 - Public agencies duly authorized under the law, including, inter alia, the Polish Financial Supervision Authority and the General Inspector for Financial Information in Poland - for legal and regulatory compliance reasons (as applicable to Unum Życie);
 - Those who provide services to Unum Życie, such as, for example, medical, IT, legal or consulting service providers - in connection with the provision of these services.

TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

7. Your personal data may also be transferred to IT system subcontractors based in the countries outside the European Economic Area, whose personal data protection level has not been endorsed as adequate by the European Commission.
8. We may transfer your personal data outside the European Economic Area in accordance with the applicable legislation, in particular, on the basis of decisions issued by the European Commission or standard data protection clauses adopted by the European Commission. You may obtain a copy of the document governing the processing of your data outside the European Economic Area by contacting the Data Protection Officer.

DO I HAVE TO SHARE MY PERSONAL DATA?

9. The use of insurance cover is voluntary. However, the provision of personal data in connection with a life insurance contract is necessary for contract conclusion and performance - without access to personal data, including health data, a life insurance contract can neither be concluded nor performed.
10. The data provided for direct marketing purposes is shared on a voluntary basis and it is not required for life insurance contract conclusion and performance.

THE RIGHTS ASSOCIATED WITH PERSONAL DATA PROCESSING

11. You have rights in relation to the processing of your personal data, including: (i) the right to access your personal data; (ii) the right to have your personal data rectified; (iii) the right to have your personal data erased, (iv) the right to restrict the processing of your personal data; (v) the right to data portability - under the terms specified in data protection legislation, including the EU General Data Protection Regulation 2016/679 (the GDPR).
12. Insofar as the processing of your personal data is based on the pursuit of legitimate interests, you have the right to object to the processing of your personal data, in particular in relation to their processing for direct marketing purposes.
13. Insofar as the processing of your personal data is based on a consent, you have the right to withdraw such consent at all times. Consent withdrawal does not undermine the lawfulness of the processing that was carried out on the basis of consent prior to its withdrawal. Should you withdraw your consent for the processing of your health data or for the transfer of your health data to a reinsurer, life insurance contract performance or risk reinsurance may be compromised.
14. You have the right to lodge a complaint with the President of the Personal Data Protection Office, who is the supervisory authority responsible for personal data protection in Poland.