

Vhi and Collinson Data Protection Statement – Vhi International Health Insurance

What is the purpose of this notice?

In order to provide you with the Vhi International Health Insurance product, Vhi and Collinson need to get to know you and what your needs are. This means that Vhi and Collinson collect certain information about you in the course of providing the Vhi International Health Insurance product. This notice sets out details of the information that is collected, how it is processed, to whom it is disclosed, and your rights under data protection law in relation to the processing of your data.

Who controls the use of your personal data?

Vhi Healthcare DAC (“Vhi”) works with Collinson Insurance Europe Limited (“Your Insurer”) and their agent Collinson Insurance Solutions Europe Limited (“CISEL”) together trading as “Collinson” to provide the Vhi International Health Insurance product.

Vhi and Collinson generally act as separate controllers of personal data that is collected and processed in connection with the Vhi International Health Insurance product. However, there are some limited circumstances when Vhi and Collinson act as joint controllers of your personal data. For further details about these circumstances, please refer to the notice below. Collinson will also be separate controllers of your personal data for claims administration purposes and to meet their statutory obligations.

Your Insurer will be a controller of your personal data for claims administration purposes and to meet its statutory obligations.

Vhi’s registered address is Vhi House, Lower Abbey Street, Dublin 1. Collinson’s registered address is Third Floor, Development House, St Anne Street, Floriana, FRN 9010, Malta.

If you have any queries in relation to the processing of your personal data, Vhi has appointed a data protection officer that you can contact at dataprotection@vhi.ie. You can also contact Collinson’s data protection officer at data.protection@collinsongroup.com.

What personal data is processed by Vhi and Collinson as separate controllers and as joint controllers?

Vhi is responsible for selling you your Vhi International Health Insurance product, making any changes that you may need to make to it and undertaking any marketing, with your permission, once the policy has been sold. Collinson needs to administer the underlying insurance policy, meet its regulatory obligations and deal with any claims that you may need to make. Vhi and Collinson have entered into an agreement under which they have agreed that they each act as separate controllers of your personal data when processing your personal data for these purposes (as further set out below). However, in the event you make a claim or complaint in relation to your Vhi International Health Insurance product, the parties may deal with your claim or complaint on a joint basis in certain circumstances, and will therefore act as joint controllers. Further details of Vhi’s and Collinson’s processing of your personal data as joint controllers are set out below.

In the event that Vhi’s relationship with Collinson is terminated, Collinson will only continue to process your personal data to meet its contractual, regulatory or legal obligations and Vhi’s role as controller will be unaffected by the termination.

What personal data is processed by Vhi as a separate controller?

In order to provide the Vhi International Health Insurance product to you Vhi needs to process certain personal data in relation to you, which includes:

- *Biographical data* – Vhi collects the following biographical data: name, assumed names, address, mobile phone number, email address, gender, and date of birth.
- *Eligibility for membership* – Vhi may ask for evidence of your eligibility to purchase a Vhi International Health Insurance policy (i.e. evidence that you are an Irish resident), and evidence on renewal in connection with your continued eligibility for the policy. Vhi may also request further details from you in order to assess your application for a policy, including your state of health, employment or status.
- *Pre-existing conditions* – If at the time of your application, you are not a member of a health insurance plan provided and underwritten by an Irish licensed insurer, Vhi will require details of any pre-existing medical conditions
- *Payment data* – Your payment details such as the IBAN, BIC and the name of your bank/building society will be collected and processed by Vhi in the event that you purchase a Vhi International Health Insurance product.
- *Claims data* – If you make a claim Vhi will process details of the incident or event that gives rise to your claim. Where you make a claim in connection with medical treatment, Vhi may process details of your medical history, details of services claimed, treatment dates, payments you have made and, if necessary, further medical information that is required to be accessed or requested relating to your claim. Vhi may also process details of other insurance products that may cover aspects of your claim, and further information that you provide in support of your claim, such as original or copy receipts.
- *Interactions with customer services* – If you interact with Vhi's customer services departments Vhi will record details of those interactions (e.g. records of phone calls, email correspondence and hard copy correspondence). If you make a complaint Vhi will process details in relation to that complaint.
- *Digital platforms* – When you interact with Vhi's digital platforms you will often provide personal data to Vhi, which you will be aware of when using the services. Vhi also automatically collects data about your use of its services, such as the IP address of the device you use to access the service, the type of device you are using, and how you interact with the services. Further details are available in the cookies policy and/or the data protection notice that accompanies the relevant service.

What personal data is processed by Collinson as a separate controller?

In order to provide the Vhi International Health Insurance product to you Collinson needs to process certain personal data in relation to you, which includes:

- *Biographical data* – Collinson processes the following biographical data: name, assumed names, address, mobile phone number, email address, gender, and date of birth.
- *Claims Payment data* – Collinson processes your payment details such as the IBAN, BIC and the name of your bank/building society if you make a claim and receive payments through electronic funds transfers.
- *Claims data* – If you make a claim Collinson will process details of the incident or event that gives rise to your claim. Where you make a claim in connection with

medical treatment, Collinson may process details of your medical history, details of services claimed, treatment dates, payments you have made and, if necessary, Collinson may access or request further medical information relating to your claim. Collinson may also process details of other insurance products that may cover aspects of your claim, and further information that you provide in support of your claim, such as original or copy receipts.

- *Interactions with customer services* – If you interact with Collinson’s customer services departments Collinson will record details of those interactions (e.g. records of phone calls, email correspondence and hard copy correspondence). If you make a complaint Collinson will process details in relation to that complaint. Collinson will also receive data in relation to complaints made directly to VHI to comply with regulatory reporting and ensure products are continuing to meet the needs of customers.

Where is your personal data collected from?

Most of the personal data that Vhi and Collinson collect about you will be provided by you through application forms, claims forms and your interactions with customer services. However, certain information may be provided by third parties on your behalf, including the following:

- *Group schemes* – Some customers avail of the Vhi International Health Insurance product through a scheme that is operated by their employer. In order to sign you up as a customer your employer will give Vhi certain details, such as your name, address, gender, age, contact details, and details of dependants that will be included on a policy.
- *Dependants* – It is very common for insurance policies to cover not just the policyholder, but also their dependants. If you are a dependant covered by a policy, the policyholder will have provided Vhi with certain details, such as your name and address, gender and age. In the event that a claim is made, the policyholder (or someone else with your permission) may provide Vhi and/or Collinson with the “claims data” outlined above.
- *Hospital and primary care providers* – If you are making a claim, you may have had some interactions with a hospital or primary care provider. Collinson will contact these entities so that they can provide it with details of the services that you have received, so that your claim can be properly assessed and processed.
- *Digital platforms* – When you access Vhi’s digital platforms Vhi will collect the information that you provide to Vhi through the platform, and will also automatically collect certain data in relation to your use of Vhi’s services, such as the IP address of the device you use to access the service, the type of device you are using, and how you interact with the services.

Why do you process my personal data?

Vhi and Collinson process your personal data in order to provide you with the Vhi International Health Insurance product and to assist them in the operation of their businesses. Under data protection law Vhi and Collinson are required to ensure that there is an appropriate basis for the processing of your personal data, and they are required to let you know what that basis is. There are various options under data protection law, but the primary bases that are used by Vhi and Collinson are (i) processing necessary for the performance of a contract with you, (ii) processing necessary in order for Vhi and/or Collinson to pursue their legitimate interests, (iii)

processing where you and/or your dependants' have given your consent, and processing that is required under applicable law. Further details of the processing of your personal data are set out below, together with the basis for that processing:

Vhi and Collinson's processing of your personal data as joint controllers

- *Claims* – Vhi and Collinson will jointly process your personal data in order to process your claim where you make a claim that requires the parties to co-ordinate a response (e.g. where it is not clear if your claim is covered by the Vhi International Health Insurance product). Where Vhi and Collinson process health related claims data, this will be on the basis that it is necessary and proportionate for the purposes of administering your insurance policy. In addition your personal data is processed by Collinson on the basis that it is necessary in order for the performance of its contract with you, and by Vhi on the basis of its legitimate interest in ensuring the proper operation of the Vhi International Health Insurance product.
- *Complaints* – Vhi and Collinson will jointly process your personal data in order to deal with your complaint in circumstances where your complaint relates to the actions or responsibilities of both parties. Where Vhi and Collinson process health related claims data, this will be on the basis that it is necessary and proportionate for the purposes of administering your insurance policy. In addition your personal data is processed by Vhi and Collinson on the basis of their legitimate interests in ensuring the proper operation of the Vhi International Health Insurance product.

Vhi's processing of your personal data

- *Assessing eligibility* – Vhi will process your personal data in order to assess your eligibility to purchase the Vhi International Health Insurance policy at the time you apply for the policy and on renewal. Vhi processes this personal data on the basis of its legitimate interests in ensuring that only eligible persons purchase a policy. Where Vhi processes health related data in the context of assessing eligibility, this will be on the basis that it is necessary and proportionate for the purposes of providing insurance policies as part of its business.
- *Administering your policies* – Vhi will process your personal data in order to administer your policy. This includes processing your personal data in order to receive payments, and to maintain Vhi's records of the insurance products that you have purchased. Where Vhi processes your personal data in order to administer your policy this will be on the basis of Vhi's legitimate interest in making the Vhi International Health Insurance product available and ensuring that Collinson operates the insurance policy in accordance with Vhi's agreement with Collinson.
- *Providing you with services* – Vhi provides different channels to engage with you in order to provide you with its services, including where you have opted to avail of electronic channels such as MyVhi, Vhi's website and mobile app. The MyVhi section of Vhi's website, and Vhi's mobile applications, give you access to your policy documents and information in one secure place, anytime, anywhere. Vhi is the sole controller of personal data that is processed to provide you with access to Vhi's digital channels, but personal data that is transmitted through these channels that relates to claims will be processed in accordance with the provisions of this notice. Where Vhi processes health related claims data in the context of providing these services, this will be on the basis that it is necessary and proportionate for the purposes of providing insurance policies as part of its business. Any other data is processed on the basis of Vhi's legitimate interest in ensuring Collinson operates the insurance policy in accordance with Vhi's agreement with Collinson.

- *Running Vhi's business* – In order to ensure that Vhi can continue to provide its products and services, it is essential to ensure that it can manage the costs of claims and determine what events each of Vhi's policies can cover. In order to do this Vhi undertakes extensive modelling of the current and historic claims made by its customers. This information is used to identify patterns in claims, to try to predict future trends and how they might affect Vhi's business, and to undertake pricing, profitability and propensity to claim studies. This information may be used to help Vhi develop new product benefits and services. Vhi also undertakes auditing and quality control to check that its processes are robust and are being followed. In addition, Vhi also needs to process your data to meet certain regulatory and legislative obligations that apply to its business. Vhi try to do all of the above by using aggregated or anonymous data where possible, so you won't be identifiable from the data, but some of this work involves processing your data without anonymising it. Where Vhi processes health related claims data, this will be on the basis that it is necessary and proportionate for the purposes of providing insurance policies as part of its business. Any other personal data that Vhi processes will be on the basis of its legitimate interests in operating its business, or on the basis of a legal obligation to which Vhi is subject.
- *Marketing* – If you provide Vhi with your consent to send you marketing messages Vhi will process your personal data in order to make sure that any marketing messages that Vhi sends to you are relevant to you. Vhi also undertakes market research and surveys, which provides Vhi with market insights. Vhi's processing of your personal data in relation to marketing and market research will be subject to your consent.
- *Fraud prevention and claims management* – It is an unfortunate feature of any insurance product that fraud can occur from time to time. Vhi has a number of systems and procedures in place to monitor for potentially fraudulent claims. If Vhi identifies a suspicious claim or pattern of claims, Vhi will process your personal data in order to investigate the claim and to take appropriate measures to protect itself and its customers. Where Vhi processes health data in connection with fraud prevention and claims management, this will be on the basis that it is necessary and proportionate for the purposes of administering your insurance policy. Any other personal data that Vhi processes will be on the basis of its legitimate interests in preventing fraudulent claims.
- *Administering Vhi's computer systems* – Vhi relies on technology and computer systems to run its business. Vhi has an extensive team of developers and support engineers who are constantly testing its systems, running trials of new software, and providing support to its users. In order to do this, where possible Vhi tries to use test data or anonymised data, but on occasion Vhi may have to access live data directly, or Vhi will often make a copy of some of the data that sits in its live systems and run its tests on that to make sure everything is working before a change is rolled out. These copies may include your personal data, including details in relation to claims you have made. In general this processing of your personal data is justified by Vhi's legitimate interests in making sure its computer systems run properly and are safe and secure. If Vhi processes health data when running these tests or providing support services to its users, this will be on the basis that it is necessary and proportionate for the purposes of providing insurance policies as part of its business.
- *Statutory and regulatory obligations* – Vhi includes the total number of claims made in relation to a policy in its renewal documentation. This is done to comply with its legal obligations.

- *Administering your policies* – Collinson will process your personal data in order to administer your policy. This includes processing your personal data in order to make payments, and to maintain its records of the insurance products that you have purchased. Where Collinson processes your personal data in order to administer your policy this will be on the basis that it is necessary in order for the performance of its contract with you.
- *Administering claims* – In order to administer a claim that you make under a policy Collinson will need to process personal data in relation to the claim. Where you make a claim in connection with medical treatment, this will include the underlying medical condition that is treated, your medical history, and the medical services that you receive. Collinson will also need to process your personal data in order to deal with claims queries or to deal with complaints queries. If your claim is successful, Collinson will process your personal data in order to cover any claims that you have made, refund you fees that you may have incurred or to pay any service providers directly. Where Collinson process health related claims data, this will be on the basis that it is necessary and proportionate for the purposes of administering your insurance policy. Any other data is processed on the basis that it is necessary in order for the performance of Collinson’s contract with you
- *Running Collinson’s business* – Collinson processes your personal data in order to operate its business, which involves processing personal data in a similar manner to how Vhi processes your personal data for these purposes (see “Running Vhi’s business” above). Where Collinson processes health related claims data, this will be on the basis that it is necessary and proportionate for the purposes of providing insurance policies as part of its business. Any other personal data that Collinson processes will be on the basis of its legitimate interests in operating its business, or on the basis of a legal obligation to which Collinson is subject.
- *Administering Collinson’s computer systems* - Collinson processes your personal data in order to operate its computer systems, which involves processing personal data in a similar manner to how Vhi processes your personal data for these purposes (see “Administering Vhi’s computer systems” above). In general this processing of your personal data is justified by Collinson’s legitimate interests in making sure its computer systems run properly and are safe and secure. If Collinson processes health data when running tests or providing support services to its users, this will be on the basis that it is necessary and proportionate for the purposes of providing insurance policies as part of its business.

Important information about when you are asked for your consent to the processing of your personal data

In order to process certain personal data in relation to you, Vhi needs your consent (e.g. in connection with some of its marketing activities). When Vhi processes your personal data on the basis of your consent, you are free to withdraw that consent at any time. You can withdraw your consent by contacting Vhi using the contact details at the bottom of this notice. Please note that if you withdraw your consent Vhi may not be able to continue providing you with the service to which the consent related.

Information you are obliged to provide

Collinson requires certain information from you in order to be able to enter into a contract with you and Vhi requires certain information to provide you with its services. Where this is the case Vhi and/or Collinson will indicate on relevant forms what personal data is required in order to enter into the contract with you. If you do not provide the information, Vhi and/or

Collinson will not be able to provide you with their services.

Categories of recipients of your personal data

Vhi and/or Collinson share your personal data with the following third parties:

- *Hospitals and primary care providers* – Collinson will provide hospitals and primary care providers with information that allows them to verify that your claim is covered by your policy and the current level of cover that you have. Collinson will also need to make sure that you receive the appropriate treatment.
- *Service providers* – Vhi and Collinson rely on trusted third parties to help them run their businesses and to provide them with specialised services. This can include companies that provide IT services, from scanning letters that are received and loading them onto IT systems to companies hosting data when providing software services. Vhi and Collinson also engage with companies that provide them with non-IT related services, such as legal advisors, accountants and consultants. Collinson may also need to share personal data in order to handle any claim that you make. Who Collinson needs to share data with will depend on your particular circumstances at the time of your claim, but examples may include local claims administrators, cost containment specialists and medical/transport repatriation services. Where service providers have access to your personal data Vhi and Collinson ensure that they are subject to appropriate contracts and other safeguards.
- *Underwriters* – In the insurance industry it is common practice to engage an underwriter to take on the risks associated with a policy. In such circumstances, the underwriter will be given access to details about your claim in order to process your claim.
- *Regulators* – In certain circumstances Vhi or Collinson may be obliged to provide information to a regulator, such as in relation to the investigation of complaints.
- *Group companies* – Vhi and Collinson each consist of a number of separate companies. Some of these companies provide services on an intra-group basis in Ireland and in the case of Collinson in Malta and the UK. The provision of intra-group services may involve the sharing of your personal data between one or more of Vhi's or Collinson's group companies.
- *Banking and Financial Institutions* - Vhi may share data with banks and other credit and payment institutions to process premium collection including direct debits, funds transfers, credit management, standing orders and other electronic funds transfers as necessary. Collinson may share data with banks and other credit and payment institutions to make claims payments.

Transfers outside of the EU

There are certain circumstances where Vhi, Collinson and/or its agent CISEL, will transfer your personal data outside of the European Union to a country which is not recognised by the European Commission as providing an equivalent level of protection for personal data as is provided for in the European Union. Collinson may need to transfer your personal data outside of the European Union in order to process your claims (e.g. when you make a claim in relation to treatment at a hospital outside of the EU or to provide round the clock customer service). Such transfers of personal data are on the basis that the transfer is necessary in order to perform Collinson's contractual obligations under your policy.

If Vhi, Collinson or its agents transfer your personal data outside of the European Union for any other reason please rest assured that they will ensure that appropriate measures are in place to protect your personal data and to comply with their obligations under applicable data protection law. This may mean that Vhi or Collinson enter into contracts in the form approved by the European Commission, or use such other GDPR compliant transfer mechanisms that may be approved from time to time. If you would like further details about the measures that Vhi or Collinson have taken in relation to the transfer of your personal data, or copies of the agreements that they have put in place in relation to the transfers, please contact Vhi or Collinson using the details at the bottom of this notice.

Retention of personal data

Vhi and Collinson will retain your personal data in accordance with their record retention policies. The record retention policies each operate on the principle that personal data is kept for no longer than is necessary for the purpose for which it was collected, and in accordance with any requirements that are imposed by regulators or by law. This means that the retention period for your personal data will vary depending on the type of personal data. For further information about the criteria that Vhi and Collinson apply to determine retention periods please see below:

- *Statutory and regulatory obligations* – As Vhi and Collinson work in a highly regulated industry, they each have certain statutory and regulatory obligations to retain personal data for set periods of time.
- *Managing legal claims* – When assessing how long they keep personal data Vhi and Collinson take into account whether that data may be required in order to defend any legal claims which may be made. If such data is required, it may be kept until the statute of limitations runs out in relation to the type of claim that can be made (which varies from 2 to 12 years).
- *Business requirements* – As personal data is only collected for defined purposes, Vhi and Collinson assess how long they need to keep personal data for in order to meet their reasonable business purposes.

Your rights

You have various rights under data protection law, subject to certain exemptions, in connection with the processing of your personal data:

- *Right to access the data* – You have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.
- *Right to rectification* – You have the right to request that any inaccurate data that is held about you is corrected, or if incomplete information is held about you, you may request that the information is updated such that it is complete.
- *Right to erasure* – You have the right to request the deletion of the personal data that is held about you. This is sometimes referred to as the right to be forgotten.

- *Right to restriction of processing or to object to processing* – You have the right to request that your personal data is no longer processed for particular purposes, or to object to the processing of your personal data for particular purposes.
- *Right to data portability* – You have the right to request that you, or a third party, are provided with a copy of your personal data in a structured, commonly used machine readable format.

You may make a request to exercise your data subject rights to Vhi or Collinson using the contact details below. Vhi and Collinson have agreed that in circumstances where your request relates to personal data held by both Vhi and Collinson, either jointly or separately, they will cooperate to ensure that your request is processed appropriately. This will mean that Vhi may respond to your request on behalf of Collinson in certain circumstances.

Questions and Complaints

If you have any queries or wish to make a complaint about Collinson's processing of your personal data in connection with the handling of your claim, you can contact their data protection officer at:

Postal Address:

Data Protection Officer
Collinson Insurance Solutions Europe Ltd trading as
Collinson Cutlers Exchange, 123 Houndsditch,
London
EC3A 7BU

E-mail Address:

Collinson's data protection officer at data.protection@collinsongroup.com

If you have any queries or complaints in connection with Vhi's processing of your personal data, you can get in touch with Vhi using the following contact details:

Postal Address:

Data Protection Officer
Vhi House
Lower Abbey Street
Dublin 1

E-mail Address:

Vhi's data protection officer at dataprotection@vhi.ie

You also have the right to lodge a complaint with the Data Protection Commission (DPC) if you are unhappy with our processing of your personal data. Details of how to lodge a complaint can be found on the dataprotection.ie website by selecting the appropriate webform, or by writing to the DPC at - Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2. DO2, RD28, Ireland.

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