

Vhi and Zurich Data Protection Statement

– Vhi Life Term Insurance and Vhi Mortgage Protection

What is the purpose of this notice?

In order to provide you with your Vhi Life Term Insurance or Vhi Mortgage Protection, Vhi Healthcare DAC work with Zurich Life Assurance plc. As explained in your policy documentation, Vhi Healthcare DAC (“Vhi”) is tied to Zurich Life Assurance plc for Vhi Life Term Insurance and Vhi Mortgage Protection which are underwritten by Zurich Life Assurance plc (“Zurich”).

This notice sets out details of the information that Vhi and Zurich each collect, how Vhi and Zurich each process it and with whom it might be shared. It also explains your rights under data protection law in relation to the processing of your personal data. Vhi and Zurich act as separate controllers of the personal data which they process.

Who controls the use of your personal data relating to Vhi Life Term Insurance or Vhi Mortgage Protection?

Vhi Healthcare DAC, whose registered address is Vhi House, Lower Abbey Street, Dublin 1, controls and is responsible for personal data that is collected as set out in the section “*What personal data is collected by Vhi?*” below and is also responsible for the personal data that is processed by Vhi, which also includes personal data which has been transferred to Vhi by Zurich in connection with your Vhi Life Term Insurance or Vhi Mortgage Protection policy.

Zurich Life Assurance plc, whose registered address is Zurich House, Frascati Road, Blackrock, Co. Dublin, controls and is responsible for personal data that is collected by Zurich as set out in the section “*What personal data is collected by Zurich?*” below and is also responsible for the personal data that is processed by Zurich, which also includes personal data which has been transferred to Zurich by Vhi in connection with your Vhi Life Term Insurance or Vhi Mortgage Protection policy.

If you have any queries in relation to the processing of your personal data by Vhi, you can contact Vhi’s data protection officer at dataprotection@vhi.ie or you can contact the Vhi Customer Services team on 056 77 07600. If you have any queries in relation to the processing of your personal data by Zurich, you can contact Zurich’s data protection officer at dataprotectionofficer@zurich.ie or you can contact the Zurich Customer Services team on 01 799 2711.

What personal data is collected by Vhi?

In order to allow the provision of Vhi Life Term Insurance or Vhi Mortgage Protection, Vhi needs to collect certain personal data in relation to you, which includes:

- **Biographical data** – Title, name, address, phone number, email address, gender, family relationships (e.g. spouse, dependents), nationality and date of birth.
- **Eligibility and application assessment data** – Relevant medical history (personal and relevant family members), personal habits (e.g. smoking and alcohol consumption), prescription information and other health data including the name and contact details of your GP).
- **Payment and other financial data** – If you pay by direct debit or send or receive payments through electronic funds transfers, Vhi will collect the IBAN, BIC and the name of your bank/building society on behalf of Zurich. For the purpose of assessing your suitability for Vhi Life Term Insurance or Vhi Mortgage Protection, Vhi also collects certain limited information about your existing life insurance cover, income details and savings/investments. Vhi also collect information about how many dependents you have and the age of the youngest dependent.

- **Interactions with Vhi** – Vhi record details of your interactions with it (e.g. phone calls and logs of phone calls, email correspondence and hard copy correspondence). If you make a complaint Vhi will process details in relation to that complaint.

What personal data is collected by Zurich?

In order to consider your application, and in order to provide you with Vhi Life Term Insurance or Vhi Mortgage Protection, Zurich needs to collect certain additional personal data in relation to you, which includes:

- **Additional eligibility and application assessment data** – Depending on whether Zurich deems it necessary, Zurich may request a report to be completed by your GP from your medical records or by an independent medical professional or ask that you undertake blood or other tests. In all cases the relevant medical professional will provide a report back to Zurich and such report will by necessity contain medical and other health information relevant to your application for Vhi Life Term Insurance or Vhi Mortgage Protection. The material in that report or reports will be assessed by Zurich in order to further determine your eligibility and consider your policy application, as well as to provide you with a quotation, for Vhi Life Term Insurance or Vhi Mortgage Protection. Such medical reports are not shared with Vhi.
- **Interactions with Zurich** – Zurich record details of your interactions with it (e.g. phone calls and logs of phone calls, email correspondence and hard copy correspondence). If you make a complaint Zurich will process details in relation to that complaint.

Sources: Where does Vhi collect personal data from?

Most of the personal data that Vhi collects will be provided by you through telephone conversation(s) with you in connection with you making an application for Vhi Life Term Insurance or Vhi Mortgage Protection and your other direct interactions with Vhi. However, certain information may be provided to Vhi by third parties on your behalf, including the following:

- **From Zurich** – Vhi receives a limited amount of personal data from Zurich in connection with your Vhi Life Term Insurance during its term and thereafter (e.g. notification of a claim and confirmations of payment).
- **Online Services** – When you access Vhi’s online services, Vhi will collect the information that you provide to it this way. Vhi will also automatically collect certain personal data about your use of Vhi services, such as the type of device you are using and its IP address and how you interact with the services.

Sources: Where does Zurich collect personal data from?

- Zurich’s main source of personal data in connection with your Vhi Life Term Insurance policy or Vhi Mortgage Protection is Vhi. Zurich receives all of the biographical data, eligibility and application assessment data, payment and other financial data information set out in the section “*What personal data is collected by Vhi?*” above directly from Vhi which you have provided to Vhi in order to apply for Vhi Life Term Insurance or Vhi Mortgage Protection. Zurich may also receive personal data from Vhi if you submit a claim form to Zurich through Vhi. Zurich may seek access to call recordings from Vhi relating to the Vhi Life product from time to time during the term of your Vhi Life Term Insurance or Vhi Mortgage Protection policy and thereafter.



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- **Medical professionals** – As described in the section “*What personal data is collected by Zurich?*” above, Zurich receives personal data from medical professionals in connection with its assessment of your application for Vhi Life Term Insurance, or its assessment of any proposed amendment to your policy.
- **Online Services** – When you access Zurich’s online services, Zurich will collect the information that you provide to it this way. Zurich will also automatically collect certain personal data about your use of Zurich services, such as the type of device you are using and its IP address and how you interact with the services.
- **Other insurers** – Zurich may receive your personal data from other insurers to verify your previous insurance details as well as for other regulatory reasons.
- **Third parties** – Zurich may receive personal data relating to you from third parties appointed by it in connection with the investigation of a claim.

Why do Vhi and Zurich process my personal data?

Vhi and Zurich each process your personal data in order to provide you with their respective services and to assist them in the operation of their respective businesses. Under data protection law, as separate controllers, Vhi and Zurich are separately required to ensure that there is an appropriate basis for the processing of your personal data, and Vhi and Zurich are each required to let you know what that basis is.

There are various options under data protection law, but the primary bases that Vhi and Zurich each use for the processing of personal data (such as your name) are:

(a) processing necessary for the performance of our respective contracts with you, (b) processing necessary in order for us to pursue our respective legitimate interests, (c) processing that is required under applicable law and (d) processing where we have your consent.

The basis we use for our respective processing of special categories of data (which mainly includes your health and medical data) is processing necessary and proportionate for the purpose of a policy of life assurance. In addition, we may obtain information relating to your criminal convictions when we ask if you have been convicted of any drink driving offences. The basis for processing this personal data is that it is necessary and proportionate for the purpose of a policy of life assurance and for the prevention of fraud. We also obtain your PEP (politically exposed person) status, which is necessary for the purpose of “*know your customer*” checks that each of us have a legal obligation to conduct.

We set out further details of our respective processing activities concerning your personal data below, together with the basis for that processing:

- **Assessing and underwriting your application for Vhi Life Term Insurance or Vhi Mortgage Protection** – Vhi and Zurich each process your personal data in order to allow Vhi to assess your application, conduct a suitability assessment in accordance with regulatory requirements and provide investment advice. Zurich assess and underwrite your application for Vhi Life Term Insurance or Vhi Mortgage Protection. This also includes processing by Zurich for the purpose of international sanctions law and anti-fraud screening.
- **Administering your Vhi Life Term Insurance or Vhi Mortgage Protection** – Once your policy has entered into force, Vhi and Zurich each process your personal data in order to administer your policy. For example, Vhi process your personal data in order to administer direct debit payments and special offers

with respect to your policy. Zurich process your personal data in order to make and receive payments, and to maintain records of the insurance products that you have purchased. Where Vhi and Zurich process your personal data in order to administer your policy this will be on the basis that it: (a) is necessary in order for the performance of the contract(s) with you, (b) is in our legitimate interests in operating our respective businesses or (c) is permitted by applicable law as being necessary and proportionate for the purposes of providing insurance services or insurance policies as part of our respective businesses.

- **Providing you with relevant customer services** - Vhi provides different channels to engage with you. Where Vhi process any other personal data in the context of providing these services, it will be on the basis of our legitimate interests in operating its business and providing the services.
- **Processing claims for policy benefits and policy benefits generally** – In order to process a claim for a policy benefit that you or a beneficiary makes under your Vhi Life Term Insurance policy or Vhi Mortgage Protection, Zurich will need to process personal data in relation to the claim for that benefit. This includes any underlying medical condition that is relevant to your claim for a policy benefit, your medical history, and any medical services that you receive or received. Zurich will also need to process your personal data in order to deal with queries about your policy, to highlight benefits under your policy that are most relevant to you, or to deal with complaints from you or on your behalf.

If any claim for a policy benefit is successful, Zurich will process personal data in order to make payment of a policy benefit to you or a relevant beneficiary. Where Zurich processes health related data, this will be on the basis that it is necessary and proportionate for the purposes of administering your life insurance policy. Where Zurich process any other personal data in the context of assessing your claim for a policy benefit, it will be on the basis that it is necessary in order to perform our contract with you, or on the basis of its legitimate interests in managing the processing of claims.

- **General policy information** – In order to maintain records of the insurance products that you have purchased via Vhi, Vhi and Zurich will each separately retain and process relevant policy records, including the fact that you have taken out Vhi Life Term Insurance or Vhi Mortgage Protection and its policy term. In addition, if you contact Vhi or Zurich, or if either Vhi or Zurich contact you, about your Vhi Life Term Insurance or Vhi Mortgage Protection policy, Vhi and Zurich will need to process your personal data in order to deal with queries about your policy or to deal with any complaints from you or on your behalf. Where Vhi or Zurich process health related data, this will be on the basis that it is necessary and proportionate for the purposes of administering your life insurance policy and otherwise Vhi or Zurich will do this on the basis of our legitimate interests in operating our respective businesses and furthering our respective relationships with you.
- **Running our businesses** – It is essential for both Vhi and Zurich to ensure that they each manage the costs of claims and determine what benefits and services each of our respective business practices and policies can cover. In order to do this Vhi and Zurich may each separately carry out research and analysis including analysis of your personal data on the basis of our legitimate interests. Vhi and Zurich each also carry out auditing and quality control to check that their respective processes are robust and are being followed. In addition, Vhi and Zurich also each need to process personal data to meet certain regulatory and legislative obligations that apply to their respective businesses.



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Vhi and Zurich each 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 personal data without anonymising it. Where Vhi or Zurich process health related data, this will be on the basis that it is necessary and proportionate for the purposes of providing insurance services or insurance policies as part of our respective businesses. Where Vhi or Zurich process any other personal data for these purposes, it will be on the basis of our legitimate interests in operating our respective businesses and providing insurance services or insurance policies.

- **Marketing by Vhi** – If you consent to Vhi sending you marketing messages about its products and services, Vhi will process your personal data in order to make sure that any marketing messages that it sends are relevant to you.

Vhi may undertake market research and surveys. If Vhi process your personal data for marketing and/or market research, this will be on the basis of Vhi's legitimate interests and subject to any marketing preferences you express in accordance with the applicable law concerning direct marketing.

- **Fraud prevention and claims management** – It is an unfortunate feature of insurance products that fraud can occur from time to time. Vhi and Zurich each have a number of systems and procedures in place to monitor for potentially fraudulent claims. Vhi and Zurich may also share information to seek to identify and prevent fraud. If either Vhi or Zurich identify a suspicious claim or pattern of claims, Vhi and/or Zurich will process your personal data in order to investigate the claim and to take appropriate measures to protect Vhi and/or Zurich and on occasion this may require further access to medical information/medical records. Where Vhi and/or Zurich process 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 life insurance policy. Where Vhi and/or Zurich process any other personal data in connection with fraud prevention and claims management, it will be on the basis of our legitimate interests in protecting our respective businesses against fraud and managing claims.
- **Administering computer systems** – Vhi and Zurich each rely on state of the art technology and computer systems to run their respective businesses and to allow Vhi and Zurich to respectively provide insurance services and policies.

Where possible, Vhi and Zurich each try to use test data or anonymised data to test new or changed systems, but on occasion Vhi and Zurich may have to access live data directly, or Vhi and Zurich will often make a copy of some of the data that sits in their respective live systems and run tests on that to make sure everything is working before a change is rolled out. These copies may include your personal data, including in the case of Zurich details in relation to underwriting or claims you have made. In general this processing of your personal data is justified by our respective legitimate business interests in making sure our respective computer systems run properly and are safe and secure. If Vhi or Zurich process health data when running these tests or providing support services to their respective users, this will be on the basis that it is necessary and proportionate for the purposes of Vhi and Zurich respectively providing insurance services and policies.

Consent

In order to process personal data in relation to you for certain purposes such as certain types of direct marketing, Vhi and Zurich may need to get your consent. When Vhi or Zurich process your personal data on the basis of your consent, Vhi or Zurich will

indicate this to you and you are free to withdraw that consent at any time. You can withdraw your consent to direct marketing by contacting Vhi and/or Zurich using the contact details at the bottom of this notice.

Information you are obliged to provide

Vhi and Zurich each require certain personal data from you in order to be able to enter into a contract with you and to provide you with our respective services. Where this is the case, Vhi or Zurich as appropriate, will indicate to you in advance what personal data is required in order for Vhi to provide you with insurance services and for Zurich to enter into a contract with you for Vhi Life Term Insurance or Vhi Mortgage Protection. If you do not provide the required personal data, Vhi and Zurich will not be able to provide you with their respective services.

Automated processing

Neither Vhi, nor Zurich, envisage that any decisions will be taken about you by using automated means. However Vhi and Zurich will notify you in writing if this position changes and will only carry out such processing in strict compliance with applicable law.

Who do Vhi and Zurich share your personal data with?

Vhi and Zurich each share your personal data as follows:

- **Between ourselves as Vhi and Zurich** – As explained above in this notice, in order to provide you with Vhi Life Term Insurance or Vhi Mortgage Protection, Vhi must share personal data collected by Vhi with Zurich, most importantly, to allow Zurich to underwrite and subsequently administer your policy. Zurich must share personal data with Vhi to allow Vhi to continue to further its relationship with you, to allow the entry into the Vhi Life Term Insurance or Vhi Mortgage Protection policy, to provide services to you in connection with the policy and also to provide you with other relevant services.
- **Service providers** – Vhi and Zurich each separately rely on trusted third parties to help run our respective businesses and to obtain specialised services. These can include companies that provide IT services (e.g. scanning and uploading letters from customers and hosting data when providing software services). These can also include companies that provide outsourced services, medical professionals, legal advisers, accountants, auditors and consultants. Where service providers have access to your personal data, Vhi and Zurich each ensure they are subject to appropriate contractual and other safeguards. Where Vhi and Zurich share your personal data with such third parties, it will be on the basis of our respective legitimate business interests.
- **Regulators, ombudsman or government agencies** – In certain circumstances Vhi and Zurich may each be obliged to provide information to a regulator, ombudsman or government agency (e.g. in relation to any investigation of complaints by the Financial Services and Pensions Ombudsman, in relation to a query received from the Revenue Commissioners or in order to comply with a Court Order). Where Vhi and/or Zurich share your personal data with Regulators, an ombudsman or government agency, we will do so in order to comply with our respective legal or regulatory obligations.
- **Group companies** – The Vhi and Zurich groups each consist of a number of separate companies. Some of the companies within each group may provide services to other companies within that group. This may involve Vhi and Zurich sharing your personal



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data between one or more companies within their respective groups. Zurich may also share your personal data with trusted third parties used by the Zurich group and with coinsurance and reinsurance companies. Where Vhi and Zurich share your personal data with respective group companies or with third parties used by their respective groups, including coinsurance and reinsurance companies, the sharing will be done on the basis of our respective legitimate business interests.

- **Other insurers** – Vhi and Zurich may share your personal data with other insurers in order to verify your level of cover on the basis of Vhi and Zurich's respective legitimate business interests, and to ensure compliance with other legal and regulatory requirements.
- **Other** – Zurich may share data with banks and other credit and payment institutions to process premium collection including direct debits, funds transfers, and other electronic funds transfers as necessary.

Transfers outside of the European Economic Area (EEA)

There are certain circumstances where Vhi and Zurich may each transfer your personal data outside of the EEA 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 EEA. If either Vhi or Zurich transfer your personal data outside of the EEA please be assured that Vhi or Zurich will ensure that appropriate measures are in place to protect your personal data and to comply with their respective obligations under applicable data protection law.

Depending on the country of transfer, this may mean that either Vhi or Zurich enter into contracts in the form approved by the European Commission, or we ensure that the company to which Vhi or Zurich transfer your personal data has agreed to abide by an approved transfer mechanism, in line with data protection law.

Zurich may transfer, and store, your personal data to countries outside the EEA and for which there is no adequacy decision relating to the safeguards for personal data from the European Commission. Examples of such include India and shall also include the UK from the point at which it ceases to be a member of the European Union. In such instances, appropriate safeguards are put in place by Zurich to protect your personal data.

If you would like further details about the safeguards and measures Zurich and/or Vhi have taken in relation to the transfer of your personal data, or copies of the types of agreements that we have put in place in relation to the transfers, please contact Zurich and/or Vhi using the details at the bottom of this notice.

Retention of personal data

Vhi and Zurich will each retain your personal data in accordance with their respective record retention policies. Each of these policies operates on the principle that Vhi and Zurich keep personal data for no longer than is necessary for the purpose for which it is collected. It is also kept in accordance with any legal requirements that are imposed on Vhi and Zurich. For further information about the criteria that Vhi and Zurich each apply to determine retention periods please see below:

- **Statutory and regulatory obligations** – As we each work in a highly regulated industry, we have certain statutory and regulatory obligations to retain personal data for set periods of time.
- **Managing legal claims** – When we each assess how long we keep personal data we each take into account whether that personal data may be required in order to defend any legal claims which may be made. If such personal data is required, we may keep it

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 we each only collect personal data for defined purposes, we each assess how long we need to keep personal data for in order to meet our reasonable business purposes.

Your rights

You have various rights under data protection law, subject to certain exemptions, in connection with our 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 we have incomplete information you may request that we update the information such that it is complete.
- **Right to erasure** – You have the right to request us to delete personal data that we hold 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 we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- **Right to data portability** – You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.
- **Right not to be subject to automated decision making.**
- **Right to receive notification of a personal data breach.**
- **Where processing is based on consent, the right to withdraw such consent.**

In order to exercise any of the above rights, please contact either Vhi or Zurich using the contact details set out below.

Questions and Complaints

If you have any queries or complaints in connection with Vhi or Zurich's processing of your personal data, or want to withdraw your consent to direct marketing, you can get in touch with Zurich or Vhi's respective Data Protection Officers using the following contact details:

Vhi

Vhi Customer Services team on 056 77 07600

Data Protection Officer, Vhi, Vhi House, 20 Lower Abbey Street, Dublin 1

dataprotection@vhi.ie

Zurich

Zurich Life Customer Services team on 01 799 2711

Data Protection Officer, Zurich Life Assurance plc, Zurich House, Frascati Road, Blackrock, FREEPOST, Co. Dublin.

dataprotectionofficer@zurich.ie

You also have the right to lodge a complaint with the Data Protection Commission (DPC) if you are unhappy with any processing of your personal data by either Vhi or Zurich. 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, D02 RD28, Ireland.

Vhi Healthcare DAC trading as Vhi Healthcare is regulated by the Central Bank of Ireland. Vhi Healthcare is tied to Zurich Life Assurance plc for Vhi Life Term Insurance and Vhi Mortgage Protection which are underwritten by Zurich Life Assurance plc.

