

Vhi and Intana Data Protection Statement – Vhi International Health Insurance

What is the purpose of this notice?

In order to provide you with our products and services, we need to get to know you and what your needs are. This means that we collect certain information about you in the course of operating our business. This notice sets out details of the information that we collect, how we process it, to whom we disclose it, and your rights under data protection law in relation to our processing of your data.

Who controls the use of your personal data?

Vhi Healthcare DAC (“Vhi”) works with Collinson Insurance Services Limited, trading as Intana and acting as agent for Astrenska Insurance Limited, (“Intana”) to provide the Vhi International Health Insurance product. Unless we set out otherwise in this notice, Vhi and Intana are joint controllers of personal data that is collected and processed in connection with the Vhi International Health Insurance product. References to “we”, “us” and “our” therefore should be read as references to Vhi and Intana jointly, whereas if there is a reference to Vhi this means that Vhi is the sole controller of that personal data. Similarly, any references to Intana means that Intana are the sole controller of that personal data.

Vhi’s registered address is Vhi House, Lower Abbey Street, Dublin 1, and Intana’s registered address is Cutlers Exchange, 123 Houndsditch, London, EC3A 7BU.

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 Intana’s data protection officer at data.protection@intana-assist.com.

Why are Vhi and Intana both controllers of my personal data?

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. Intana needs to administer the underlying insurance policy, meet its regulatory obligations and deal with any claims that you may need to make. Vhi and Intana have entered into an agreement under which we have agreed that where the processing of your personal data is necessary in order to enter into the International Health Insurance policy and pay claims, we will act as joint controllers of your personal data. However, as there are certain aspects of the Vhi International Health Insurance product that are operated solely by Vhi (e.g. the sale of the product and any marketing that is undertaken with your permission) Vhi is in charge of, and is therefore the sole controller of, certain personal data that is processed for those purposes. In the event that Vhi’s relationship with Intana is terminated, Intana 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 collected?

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

- *Biographical data* – We collect the following biographical data: name, assumed names, address, mobile phone number, email address, gender, and date of birth.



- *Eligibility for membership* – We may ask for evidence of your eligibility to purchase a Vhi International Healthcare policy (i.e. evidence that you are an Irish resident), and evidence on renewal in connection with your continued eligibility for the policy. We 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, we 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 us in the event that you purchase a Vhi International Health Insurance product and if you make a claim and receive payments through electronic funds transfers
- *Claims data* – If you make a claim we will process details of the incident or event that gives rise to your claim. Where you make a claim in connection with medical treatment, we may process details of your medical history, details of services claimed, treatment dates, payments you have made and, if necessary, we may access or request further medical information relating to your claim. We may also process details of other insurance 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 our customer services departments we will record details of those interactions (e.g. records of phone calls, email correspondence and hard copy correspondence). If you make a complaint we 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.

Where do we collect personal data from?

Most of the personal data that we collect about you will be provided by you through our 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 of our customers avail of our services through a scheme that is operated by their employer. In order to sign you up as a customer your employer will give us 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 our 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 us 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 us with the “claims data” outlined above.



- *Hospital and primary care providers* – If you are making a claim or using one of our services, you may have had some interactions with a hospital or primary care provider. We will contact these entities so that they can provide us 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?

We process your personal data in order to provide you with our services and to assist us in the operation of our business. Under data protection law we are required to ensure that there is an appropriate basis for the processing of your personal data, and we are required to let you know what that basis is. There are various options under data protection law, but the primary bases that we use are (i) processing necessary for the performance of our contracts with you, (ii) processing necessary in order for us to pursue our legitimate interests, (iii) processing where we have your and or your dependants’ consent, and (iv) processing that is required under applicable law. We set out further details of our processing of your personal data below, together with the basis for that processing:

- *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* – We will process your personal data in order to administer your policy. This includes processing your personal data in order to make and receive payments, and to maintain our records of the insurance products that you have purchased. Where we process 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 the contracts with you, or in the case of Vhi for our legitimate interest in ensuring the Intana operates the insurance policy in accordance with our agreement with Intana.
- *Providing you with services* - Vhi provides different channels to engage with you in order to provide you with our services, including where you have opted to avail of electronic channels such as MyVhi, Vhi’s website and mobile app. The MyVhi section of our website, and our 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 our digital channels, but personal data that is transmitted through these channels that relates to claims will be processed on a joint controller basis, as described at the beginning of this notice. Where we process 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 our business. Any other data is processed on the basis that it is necessary in order for the performance of our contracts with you, and by Vhi for their legitimate interest in ensuring Intana operates the insurance policy in accordance with Vhi’s agreement with Intana.



- *Administering claims* – In order to administer a claim that you make under a policy we 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. We 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, we 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 we 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 our contracts with you, and by Vhi for our legitimate interest in ensuring Intana operates the insurance policy in accordance with our agreement with Intana.
- *Running our business* – In order to ensure that we can continue to provide you with cover, it is essential to ensure that we can manage the costs of claims and determine what events each of our policies can cover. In order to do this we undertake extensive modelling of the current and historic claims made by our customers, which we use to identify patterns in claims, to try to predict future trends and how they might affect our business, and to undertake pricing, profitability and propensity to claim studies. This information may be used to help us develop new product benefits and services. We also undertake auditing and quality control to check that our processes are robust and are being followed. In addition, we also need to process your data to meet certain regulatory and legislative obligations that apply to our businesses. We 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 we process 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 our business. Any other personal data that we process will be on the basis of our legitimate interests in operating our business, or on the basis of a legal obligation to which we are 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 send 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. We have a number of systems and procedures in place to monitor for potentially fraudulent claims. If we identify a suspicious claim or pattern of claims, we will process your personal data in order to investigate the claim and to take appropriate measures to protect us and our customers. Where we 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 insurance policy. Any other personal data that we process will be on the basis of our legitimate interests in preventing fraudulent claims.
- *Administering our computer systems* – We rely on technology and computer systems to run our business and administer claims. We have an extensive team of developers and support engineers who are constantly testing our systems, running trials of new software, and providing support to our users. In order to do this, where possible we try to use test data or anonymised data, but on occasion we may have to access live data directly, or we will often



make a copy of some of the data that sits in our live systems and run our tests on that to make sure everything is working before we roll out a change. 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 our legitimate interests in making sure our computer systems run properly and are safe and secure. If we process health data when running these tests or providing support services to our users, this will be on the basis that it is necessary and proportionate for the purposes of providing insurance policies as part of our business.

Important information about when we ask for your consent to the processing of your personal data

In order to process certain personal data in relation to you, we need to get your consent. When we process 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 us using the contact details at the bottom of this notice. Please note that if you withdraw your consent we may not be able to continue providing you with the service to which the consent related.

Information you are obliged to provide

We require certain information from you in order to be able to enter into a contract with you and to provide you with our services. Where this is the case we 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, we will not be able to provide you with our services.

Categories of recipients of your personal data

We share your personal data with the following third parties:

- *Hospitals and primary care providers* – Intana 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. Intana will also need to make sure that you receive the appropriate treatment.
- *Service providers* – We rely on trusted third parties to help us run our businesses and to provide us with specialised services. This can include companies that provide IT services, from scanning letters that we receive and loading them onto our systems to hosting data on our behalf when providing software services. We also engage with companies that provide us with non-IT related services, such as legal advisors, accountants and consultants. We may also need to share personal data in order to handle any claim that you make. Who we need 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 our service providers have access to your personal data we 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 we are obliged to provide information to a regulator, such as in relation to the investigation of complaints.
- *Group companies* – Vhi and Intana each consist of a number of separate companies. Some of these companies provide services on an intra-group basis, which may involve the sharing of your personal data between one or more group companies.

Transfers outside of the EU

There are certain circumstances where we 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. Where you make a claim under your policy we may need to transfer your personal data outside of the European Union in order to handle that claim for you (e.g. when you make a claim in relation to treatment at a hospital outside of the EU). Such transfers of personal data are on that basis that the transfer is necessary in order to perform our contractual obligations under your policy.

If we transfer your personal data outside of the European Economic Area for any other reason please rest assured that we will ensure that appropriate measures are in place to protect your personal data and to comply with our obligations under applicable data protection law. This may mean that we enter into contracts in the form approved by the European Commission, or we ensure that the company to which we transfer your personal data has agreed to abide by an approved transfer mechanism, such as the EU-US Privacy Shield framework. If you would like further details about the measures we have taken in relation to the transfer of your personal data, or copies of the agreements that we have put in place in relation to the transfers, please contact us using the details at the bottom of this notice.

Retention of personal data

We will retain your personal data in accordance with our record retention policies. The record retention policies operate on the principle that we keep personal data for no longer than is necessary for the purpose for which we collected it, and in accordance with any requirements that are imposed on us by our 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 we apply to determine retention periods please see below:

- *Statutory and regulatory obligations* – As we 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 assess how long we keep personal data we 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, 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 only collect personal data for defined purposes, we 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.

Vhi and Intana have agreed that Vhi will deal with requests to exercise your data protection rights. In order to exercise any of the above rights, please contact Vhi using the contact details set out below. However, please note that you may also make a request directly to Intana if you wish.

Questions and Complaints

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

For claims matters contact Intana: Customer Service Line +353 46 9077377 for members in the USA (Toll Free) 1 800 852 7747

Email: vhi.international@intana-assist.com

You also have the right to lodge a complaint with the Data Protection Commission if you are unhappy with our processing of your personal data. Details of how to lodge a complaint can be found on the www.dataprotection.ie website, or you can call the Data Protection Commission on 1890 252 231.

