

Zurich International Life Limited (ZILL) Statement on General Data Protection Regulation (GDPR)

Introduction

GDPR stands for General Data Protection Regulation. GDPR is European Union (EU) regulation and sets out the rights of the individual (known as a Data Subject) and establishes the obligations of those processing and those responsible for controlling and holding data. It also establishes the methods for ensuring compliance as well as the scope of sanctions and penalties for those in breach of the data protection rules.

ZILL is authorised by the Isle of Man Financial Services Authority to conduct long term insurance business and is also registered with the Isle of Man Information Commissioner as a Data Controller. The GDPR has been implemented in the Isle of Man using an Order made under the new Data Protection Act 2018 which ensures equivalency status to the EU legal position.

ZILL and GDPR

ZILL implemented the GDPR framework on 25 May 2018. Compliance with data protection laws historically and into the future is a core requirement for ZILL as is our commitment to the protection of our policyholder's personal information. ZILL prides itself on being a customer centric business and core to maintaining the trust of our policyholders is being a business of the highest integrity through our commitment and compliance with the laws and regulations in the jurisdictions we conduct business.

Insurance Contracts and GDPR

In the course of undertaking insurance activities ZILL collects data in numerous ways, principally for the formation of an insurance contract with our policyholders, which under GDPR is deemed a legitimate purpose for processing data. Core to insurance activities is the data provided to ZILL by our policyholders and/or their appointed adviser/broker. ZILL collects data that is integral to the understanding of the risk to be covered or composition of a customers' workforce for the establishment of a savings scheme. Extensive work has been undertaken to ensure we only collect data for validated reasons and if the data is to be shared for legitimate reasons then it is done so in a controlled and transparent way. Where ZILL shares data this is clearly covered by an explanatory Data Privacy Notice and where required a Data Processing Agreement.

ZILL as a Data Controller

A Data Controller refers to a person who (either alone or jointly in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed. For the purposes of GDPR ZILL is a Data Controller. The collation of information required to form an insurance contract is controlled through the use of standard forms (e.g. Proposal, Application for Insurance and claim forms). Within the standard forms ZILL only seeks to capture information necessary for the performance of the insurance contract and seeks declarations of understanding from the policyholder or beneficiary under the policy that they have read and understood the applicable data protection notice and policy. All information received in our standard forms is produced pursuant to the insurance contract. ZILL has the technical, administrative and physical safeguards to protect personal data.

It is commonplace in the insurance industry for the existence of more than one controller (e.g. corporate customers or employers will be controllers in their own right), and it is recognised that each party controls certain aspects of the Data Subjects Personal Identifiable Information for differing purposes. For the purposes of the insurance contract ZILL determines the purpose and manner in which any personal data is processed and therefore is affixed with and accepts the responsibilities of being a Data Controller. This means that ZILL is held to the highest standards expected from any person under data protection laws and is therefore not required to enter into a data processing agreement with co-controllers.

Please see ZILL's Data Privacy Policy www.zurichinternational.com/en/zurich-international-life/about-us/privacy or write to the Data Protection Officer at Zurich House, Isle of Man Business Park, Douglas, Isle of Man, IM2 2QZ, British Isles in order to request a copy of this policy.

Zurich International Life Limited provides life assurance, investment and protection products and is authorised by the Isle of Man Financial Services Authority.

Registered in the Isle of Man number 020126C.

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