

POLICY REGARDING THE PROCESSING OF PERSONAL DATA

The present Policy regarding the Processing of Personal Data (the «Policy») is implemented by CNP CYPRIALIFE LIMITED and has the purpose of informing you about the types of data that we collect, why we collect same, for how long we hold them and the manner in which we use same.

Last update: May 23rd, 2018

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1. Who we are

CNP CYPRIALIFE LIMITED (hereinafter referred to as "CNP CYPRIALIFE" or "CNP") is a member of the CNP CYPRUS INSURANCE HOLDINGS group of companies (hereinafter referred to as the "**Group**") and is a limited liability company with shares with registration number HE 46532 and having its headquarters at 17, Acropoleos Street, CY-2006 Strovolos, Nicosia.

It holds a license to carry on insurance business with number 110 in the fields of Life, Health, Accidents and Illnesses and Group Pension Plans.

CNP CYPRIALIFE is committed, under applicable law, to safeguarding and preserving your right to protection against the unlawful processing of personal data and your right to privacy and to protect the personal data that it maintains and that concern you.

Your personal information may help us to better understand your insurance needs and to offer you a more complete and personalized service. Nevertheless, we understand that maintaining the security and confidentiality of your personal data is a great responsibility that we take very seriously. For this reason, we have developed this Policy amongst other measures, which aims to inform you about what data we collect, why we collect them and how we use them.

This Policy is addressed to natural persons who are existing customers or potential customers of **CNP CYPRIALIFE**, policyholders, authorized persons, third parties, suppliers and associates. By providing your personal data or the information of another person, such as a beneficiary of an Insurance Policy, or a person who makes an application to whom you had consented or obtained authorization to the processing of his or her data, you agree that we will use them in the manner explained in detail in this Policy. You should refer to the person whose personal information you provide to CNP CYPRIALIFE in this Policy.

You may be given further Processing Notices at a later stage that will focus on specific uses of your personal information.

Furthermore, from time to time, some changes to the Policy may need to be made in order to keep pace with changes in the legislation or technological developments. You should periodically check CNP CYPRIALIFE's website for the most recent version of the Policy.

Your personal data is sometimes referred to as "personal data", "personal information" or "data" in the Policy. For the purposes of the Policy, personal data is considered to be any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more

factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The term personal data also includes, inter alia, certain sensitive data (or special categories of data) such as health-related data of a natural person that reveal information about his/her state of health, any criminal convictions and data revealing racial or ethnic origin.

When we refer to the fact that your personal data is subject to "processing", this term includes any operation which is performed in relation to such data such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

If you need further information on the manner in which we use your personal data, you may contact CNP CYPRIALIFE's **Data Protection Officer** at the following address:

17, Acropoleos Street
Strovolos
2006 Nicosia
P.O. Box 20819
1664 Nicosia,
E-mail: dpo@cnpcyprus.com

2. Principles regarding the Processing of Personal Data

When we collect and process your personal data, we ensure that this is done lawfully, that all necessary organizational and technical measures are taken for their safety and that processing is carried out on the basis of the following processing principles:

The Processing Principles that we apply

- I. Your personal data are processed lawfully, fairly and in a transparent manner,
- II. Your personal data are collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes for which CNP CYPRIALIFE collects such data,
- III. The personal data collected are adequate, relevant and limited to what is necessary in relation to the purposes for which they are collected by us,
- IV. Your personal data are accurate and, where necessary, kept up to date,
- V. Your personal data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are collected,
- VI. Your personal data are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures,
- IV. We respect your rights in relation to the protection of your personal data and we process it in full knowledge of your rights,
- V. When we transmit your personal data either to another country or to a person carrying processing on behalf of CNP CYPRIALIFE, we take the necessary steps to protect your data, such as entering into data processing agreements.

3. How we collect your personal data

There are various ways of collecting data, nevertheless, the data is primarily collected directly from you, either through insurance consultants or intermediaries on behalf of CNP CYPRIALIFE. In some cases, we may collect certain personal information about you from third parties, for instance when an insured person names you as a beneficiary in the insurance proposal or within the framework of the submission of a claim where the claim is submitted by the policyholder or your legal representative.

The information that you directly provide to us may be obtained through an insurance application that you have submitted to us (our associates, representatives and insurance intermediaries), by telephone or alternative communication channels such as our website.

The information that we receive about you from third parties may derive from the policyholder, from our associates and representatives, from lawyers, persons filing a claim, persons authorized by you, sources available to the public.

Below is an indicative list of the ways in which CNP CYPRIALIFE may collect personal information:

(a) We collect personal data directly from you:

- When you complete an application for insurance, or when you file a form for needs analysis,
- In the context of purchasing and providing one of the services that we offer,
- Through CNP CYPRIALIFE's websites and social media pages,
- Through CNP CYPRIALIFE's software applications (CNP Cyprialife app) on mobile phones or tablets,
- Through cookies in one of our web pages (for more information, read the cookies policy)
- When you file a question, complaint or make a claim,
- When communicating with us by telephone, in which case such telephone communication may be recorded.

(b) We also collect data about you from various other sources including the following:

- From policyholders,
- From other insurance companies,

- From our partners, representatives and insurance intermediaries who carry on processing for us,
- From third parties such as your family members in the event that you are unable to provide information in relation to your insurance,
- From doctors, clinics and other health professionals,
- From your legal advisors, for instance if they are filing a claim on your behalf,
- From sources available and open to the public such as the Department of the Registrar of Companies and Official Receiver, the Land Registration Office, the Register of Bankrupts, the press, the Mass Media and the Internet,
- From credit rating agencies.

4. What types of personal data do we process

We process various types of personal data depending on the service you are interested in, which we collect from our customers or prospective clients. For instance, within the context of an application for health insurance, we may collect information about your health status or your family's medical history. Such data are considered to be special categories of data or sensitive data in view of the fact that they relate to your health status but they are necessary in order for us to be able to provide you with insurance or to process your application for coverage.

Below is a more detailed list of information that we may process. The information that we collect relates to the services that we offer and your relationship with us. When other persons are named in your application for insurance cover or in your insurance policy, such as for instance, spouses and dependent persons, we may ask you to provide information about such other persons if this is relevant to the kind of insurance that we will provide to you. In this case, you should inform such persons that their data will be processed on the basis of this Policy and their consent should be obtained (further information regarding the legitimate basis for the processing, can be found in Section 5 of the Policy).

CNP CYPRIALIFE collects and processes personal data for the purposes described in this Policy. Personal data includes the following categories:

- Personal information such as contact details, name, e-mail address, postal address, telephone, profession or job,
- Information about your identity, such as date of birth, identity no., passport, driving license no.,
- Copy of your identity card,
- Information concerning other persons included in the insurance policy or listed in the insurance proposal or insurance policy as beneficiaries, dependents, etc.,
- Information on your family status, your lifestyle and interests, for instance if you are engaged in dangerous sports, the number of your dependents,

- Your height and weight, and special categories of data such as information about your health and mental health status,
- Economic and financial profile such as source of income, source of assets, nature of transactions,
- Bank account no., information about banking or credit cards in relation to the payment of premiums,
- Information concerning your claim and/or the event that created the claim,
- Data concerning your health status, lifestyle information, e.g. use of alcohol and cigarettes, medicines, if you are driving a motorbike and whether you participate in sports,
- Insurance history, for instance whether you are insured with another insurance company,
- Family history, for instance, whether one of your parents or siblings is affected by an illness,
- Information relating to risk assessment depending on the product you are interested in,
- Your preferences regarding the commercial marketing of our products,
- Information relating to the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS), such as the country of tax residence and fiscal identification,
- Information on whether you held a political office (for Politically Exposed Persons),
- Information obtained through the use of our website, cookies and software applications (apps),
- Information that you provide during a phone call with CNP CYPRIALIFE which is recorded.

5. Manner in which we use your personal data

We primarily use your personal data in order to offer you insurance products and the proper services based on your needs, as well as for the purpose of calculating the price of the risk accordingly. We also process data in order to be able to handle and process a potential claim that you may have, as well as for informing you on new insurance products offered by our Group. Such data may be processed by CNP CYPRIALIFE, its employees, associates and representatives on its behalf for the purpose of providing insurance services.

On the basis of the law, in order to process your data lawfully, there needs to be some reason is called "legitimate basis". Below we set out the purpose for the processing of your data and the legitimate basis for such processing.

When collecting and processing data relating to your health, criminal convictions, and generally special categories of data, the legitimate basis for which processing is carried out is on the basis of your explicit consent, which is expressed by means of a signed declaration.

Legitimate basis for the Processing of Personal Data by CNP CYPRIALIFE:

- The processing of some of your personal information is necessary in order **to be able to offer you insurance and other related services** such as, for instance, to evaluate your proposal for insurance, to provide you with an offer for insurance services, for a the conclusion of a policy, prior to concluding the policy, for the performance of the policy in which you are a party or an insured party or a third party, in order to meet claims under the policy, to receive premium payments and to communicate with you in relation to the insurance service that we offer to you. If we do not have this information, our contractual relationship cannot be concluded and we will not be able to take the actions foreseen by your policy, e.g. to meet your potential claim.
- In some cases, we must process your data in order **to comply with the legal or regulatory obligations** of CNP CYPRIALIFE as the Data Controller such as for instance when we must process data for FATCA (Foreign Exchange Compliance Act) and CRS (Common Reporting Standard) purposes for the purpose of preventing and combating money laundering, or for the purpose of complying with the Insurance Law applicable in Cyprus and in the European Union.
- The processing of personal data may be necessary for the purposes of the legitimate interests pursued by CNP CYPRIALIFE such as the maintenance of business records, the development and improvement of our products and services,

- marketing our services (more details regarding the marketing of our services are set out in Section 8), carrying out market analysis and research and preventing fraud. When we carry out processing on this basis, we try to make sure that your interests or fundamental rights and freedoms are not affected.
- The processing of certain personal data may be necessary to **establish or exercise legal claims** that we or you may have, for instance when there is a claim or a judicial or extrajudicial procedure against us or against you in connection with your policy or where CNP CYPRIALIFE has a specific legal claim.
- You give **your consent** for the processing of personal data. Your explicit consent is usually requested for the processing of your data when we need to process special categories of data such as your health data or possible criminal convictions and penalty points in relation to the use of your motor vehicle. Your consent may also be requested for the purpose of contacting you about the marketing of our products. If your consent is requested, this will be clear at the stage of collecting the information and we will explain why it is necessary to provide your consent to us. If you provide data regarding some person such as a dependent, spouse or beneficiary, we will ask you to inform such person of the present Policy and to obtain his/her consent on the processing of his/her data. On rare occasions and if it is not possible to obtain the consent of an insured person, we may ask you to obtain the authorization of that person in order to obtain his or her consent to the processing of his or her data.

Please note that there are some instances where, if you do not provide your consent to the processing of personal data, it will not be possible to provide you with insurance cover or, if there is already an insurance policy in place, will not be in a position to process a claim. If the above applies, we will inform you accordingly.

6. To whom we may disclose your personal data

We may disclose your personal data to companies in the Group or to third parties outside the Group such as service providers or suppliers. We will not share your personal information for purposes other than those described in our Policy and we will inform you in case of the contrary.

More information concerning the disclosure of your personal information is provided below.

To whom we may disclose certain personal data that we have about you:

- To Group companies for general business management and efficiency purposes (within the Group) and to insurance intermediaries, associates and representatives,
- To your parents, guardians, spouses, or to the policy holder on your behalf upon authorization,
- To your representative and/or to your lawyers,
- To natural and legal persons who provide services to the Company, for instance for evaluating a claim,
- To reinsurers or reinsurance brokers (who may be outside the European Economic Area),
- To other insurance companies where a claim is made against you or on your behalf with another insurance company for handling this claim,
- To financial or business advisors,
- To supervisory and other regulatory and public authorities such as the Superintendent of Insurance, income tax authorities, criminal investigation authorities, if this is required by the law or regulations,
- To CNP's third-party service providers such as auditors, accountants, external lawyers, IT service providers, advertising agencies, storage and/or file and/or file management companies, cloud storage companies, website creation and support companies,

- To your doctor, healthcare professionals, health service providers, clinics, hospitals,
- Where there is a legal obligation to disclose information, or where there is a court order.

The disclosure or transmission of your personal information to third parties, except where there is a legal or regulatory obligation, will only take place when the recipient of the information has already entered into a contract with our Group under which it agrees to maintain the confidentiality of the information and to take all necessary technical and organizational measures to protect such information from risks. In these cases, third parties act and process your data on behalf of CNP CYPRIALIFE.

If the data will be transmitted to a country outside the European Union that does not ensure an adequate level of data protection for natural persons, measures will be taken to ensure adequate data protection, the conclusion of contractual clauses between CNP and the third party under which the third party will assume various obligations relating to the protection of information transmitted by CNP CYPRIALIFE.

7. Period during which we maintain your personal data

Our objective is to maintain your personal data only during the period required for the purposes of collecting/processing same, for instance for the duration of the insurance policy concluded between us. In some cases, there is a legal or regulatory obligation to keep the data for a longer period.

If, for any reason, the contractual relationship between us is terminated, we will retain the data until the expiration of any relevant legal claims, unless there is a legal obligation to further retain such data.

If you provide us with certain data for the purpose of supplying an insurance service but the offer is not accepted (in the sense that it does not lead to a contractual relationship), your data will be retained until the end of the next calendar year following the date of submission of the offer and the collection of the data, unless you give your consent to us to further retain your data for some other purpose.

The personal data of third parties, e.g. if a claim is filed, will be retained for the purpose of handling and processing the claim as long as this is necessary, depending on whether the claim has been settled or whether it has been brought to court. In the latter case, such data should be retained at least until the end of the proceedings and the exhaustion of legal remedies unless there is a regulatory or legal obligation to maintain same for an additional period of time.

If you would like to know whether we hold any personal data about you and/or which data we hold, you can exercise your right of access and obtain a copy of your data.

More information about your rights is provided in the next section.

8. Your rights

We recognize that the personal data that we process belong to you and we are continually making efforts to ensure that you have control over your personal data.

Based on the existing legislation governing the processing of personal data, you have the right to submit various requests regarding the personal data that we process

For example, you have the right to request a copy of the personal data that we hold about you, to ask us to correct certain information about you that is inaccurate or incorrect, or you can even request the deletion of your data. We will try to satisfy your request and if we cannot satisfy it, we will explain the reason why. Usually the reason is because this is not foreseen by the law.

On the basis of the law, you have the following rights in relation to your personal data:

- **Right to access:** You have the right to be informed, as well as the right to receive a copy of the data that we hold about you. A copy of the data is usually provided free of charge. We can provide you with a copy of your data in print or electronic form.
- **Right to rectification:** We take reasonable measures to ensure that the information that we hold about you is accurate. Nevertheless, if you believe that certain information about you is incorrect or it is not up-to-date, you have the right to ask us to correct the inaccurate information about you as well as the right to complete same.
- **Right to be forgotten:** You have the right to request the erasure of the data or of some of the data that concern you. For instance, when you are no longer a customer and there is no other legitimate basis for the retention of your data. Nevertheless, there are cases where, due to some legal or regulatory obligation, we will not be able to satisfy your request and we will explain the reason why.
- **Right to restriction:** You have the right to request the restriction of the processing of your data in certain cases, including where the accuracy of the personal data is contested for a period enabling us to verify the accuracy of the personal data or where the data is no longer necessary to be held by **CNP** but you wish for the data to be retained for the purposes of a legal claim or where you exercise your right of restriction pending your request.
- **Right to object:** You have the right at any time to object to the processing of your personal data. For instance, you have the right to object to processing for direct marketing purposes where such processing is based on our legitimate interests. If you make an application for the exercise of your right to object, processing will cease unless CNP is able to show a superior legitimate interest or if such data is required in order to support legal claims.

- If you object to the processing of your personal data **for direct marketing, we will stop processing your data for this purpose within a reasonable time after receiving your objection and we will stop contacting you for the purpose of marketing our products.**
- **Right to data portability:** You have the right, under certain conditions, to request the transmission of your data to another organization in a structured, commonly used and machine-readable format. We will satisfy your request if the processing is carried out by automated means and the processing is based on your consent or on a policy between us, provided that the rights and freedoms of others are not adversely affected. Please note that the exercise of the right to data portability does not mean the deletion of your data.
- **Right to withdraw consent:** You have the right to recall or withdraw the consent you have given to us for the processing of your data. Nevertheless, please note that the withdrawal of consent does not affect the lawfulness of processing that used to be based on consent prior to its withdrawal. In some cases, the withdrawal of your consent to the processing of your data may mean that we will not be in a position to serve you in view of the fact that the processing of certain data is inextricably linked to the provision of the service that we offer to you.
- **Right to file a complaint:** You have the right to file a complaint with the Commissioner for the Protection of Personal Data if you have a complaint about the processing of your personal data that is carried out by us.

You can find out more information on how to file a complaint on the website: <http://www.dataprotection.gov.cy>

In order to exercise your rights mentioned above or if you need further information regarding your rights, you may contact **CNP CYPRIALIFE** at:

17, Acropoleos Street
Strovolos
2006 Nicosia
P.O. Box 20819
1664 Nicosia,

E-mail: dpo@cnpcyprus.com

We assure you that we will do our best to respond promptly to your request and will advise you of the actions being taken on request.

Please note that in some cases we will not be able to meet your request for legal reasons. Nevertheless, we reiterate that we will always respond to your requests within a reasonable time, and in the event that we will not be able to satisfy your request, we will explain the reason why.

The exercise of the above rights is free of charge unless requests are manifestly unfounded or excessive, in particular because they are recurring.

Please note that in some cases, the exercise of some of the above mentioned rights means that we will not be able to continue offering insurance cover to you. Therefore, there will be no choice but to terminate the insurance cover and to cancel your insurance policy.

9. Commercial Marketing

We may use some of the personal data that we hold about you, such as your contact data, for the purpose of informing you about our products, services or offers that may be of interest to you.

You have control over how we use your information for marketing the products and services that we offer and that is why we ask for your consent for the marketing of our products.

Sometimes, if we do not have your consent for the marketing of our products and you are an existing customer of ours, we can use CNP CYPRIALIFE's legitimate interests as a basis for informing you on our products, services or offers in informing you about products that may be of interest to you.

If you do not wish to be informed about our services, products or offers, you may inform us at any time of your wish or you may withdraw or recall your consent that you granted previously and we will stop contacting you for this purpose. You can do so either in person or by writing to our postal address or email address set out in Section 10 below.

10. Communication with the Data Protection Officer

If you need more information on how we use your personal data, you can contact CNP CYPRIALIFE'S Data Protection Officer at the following address:

17, Acropoleos Street
Strovolos
2006 Nicosia
P.O. Box 20819
1664 Nicosia,
E-mail: dpo@cnpkyprus.com

Right to Complain

If you are not happy with the way in which we handled a request that you have filed or if you feel that your concerns or doubts about the processing of your personal data by us have not been handled in full, you have the right to complain to the Commissioner for the Protection of Personal Data at the following address:

Office of the Commissioner for the Protection of Personal Data

1, Iasonos Street,
2nd Floor
1082 Nicosia

PO Box 23378
1682 Nicosia
Tel.: 22818456 Fax: 22304565
E-mail: commissioner@dataprotection.gov.cy

Further information on the complaint procedure can be found at <http://www.dataprotection.gov.cy>

11. Changes to our Policy

There may be changes to our Policy from time to time in order to keep pace with changes in legislation or technological developments or on the basis of the business needs of the Group.

Relevant information regarding any modifications will be posted on our website at the following address:

<http://www.cnpcyprialife.com/>

You should check our website from time to time for the latest version of the Policy.

You also have the option to request a copy of the most recent version of the Policy in paper format.