



## DATA PRIVACY STATEMENT

In accordance with the General Data Protection Regulation (697/2016/EU) (the “**GDPR**”) and applicable Irish data protection legislation (currently the Irish Data Protection Acts 1988 to 2003) (collectively, “**Data Protection Legislation**”) Inora Life DAC (the “**Company**”) being a data controller, must provide you with information on how it and its appointed service providers process your personal data that you provide when investing in an Inora Life insurance product.

As a consequence of your investment, the Company acting as a data controller may itself (or through its service providers, together the “**Service Providers**”) process your personal information or that of your directors, officers, employees, intermediaries and/or beneficial owners. In this regard, please note the following:

### Purposes of Processing and Legal Basis for Processing

The personal data collected from you or provided by you or on your behalf in connection with your investment in an Inora Life insurance product will be collected, stored, disclosed, used and otherwise processed by the Company and the Service Providers for the purposes outlined in the table below.

Processing Activity by or on behalf of the Company	Legal Basis for Processing
Managing and administering your Inora Life insurance product on an ongoing basis.	Performance of the contract between the Company and you.
Disclosures to third parties such as auditors, regulatory, tax authorities and technology providers in the context of the day to day operations of the Company.	Performance of the contract between the Company and you.
Complying with any applicable legal, tax or regulatory obligations imposed on the Company including legal obligations under Insurance law, under tax law and under anti-money laundering / counter terrorist financing legislation.	Compliance with a legal obligation to which the Company is subject.
Recording, maintaining, storing and using recordings of telephone calls and electronic communications that you make to and receive from the Company, the Service Providers and any of their respective related,	Pursuing the legitimate interests of the Company including the maintenance of records, assisting in facilitating security arrangements, handling of disputes and for training purposes.

Directors: Corinne Bulet (French), Michael Clifford, James Kelly, Peter Madden, Brendan McCarthy, Marlène Pradeilles (French), Francis Yung (French),

Registered in Ireland No. 329745. Registered Office: 3<sup>rd</sup> Floor, IFSC House, IFSC Dublin 1; Ireland

Authorised by the Central Bank of Ireland

<b>Processing Activity by or on behalf of the Company</b>	<b>Legal Basis for Processing</b>
associated or affiliated companies for any matters related to your investment in an Inora Life insurance product, dispute resolution, record keeping, security and/or training purposes.	

**Please note that where personal data is processed for purposes of legitimate interests, you have a right to object to such processing and the Company and its appointed Service Providers will no longer process the personal data unless it can be demonstrated that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.**

### **Profiling and Screening**

The Company and its appointed Service Providers may engage in PEP screening and financial sanctions screening programs defined by the European Union (“EU”) and the United Nations (“UN”) for the purposes of complying with anti-money laundering and counter terrorist financing legislation and with applicable sanctions regimes. The implementation of such PEP screening and financial sanctions screening programmes may result in the Company or its Service Providers delaying or refusing to make a surrender payment or claim payment to you if you, your directors or any beneficial owner of your investment appear on such screening programmes. In the event that you are identified as a PEP as a result of the screening process, you may be required to provide additional information and/or documentation to the Company or its Service Providers.

### **Undertaking in connection with other parties**

By providing personal data to the Company, you undertake to be authorised to disclose to the Company relevant information regarding your directors, authorised signatories and any persons who have a beneficial ownership interest in your Inora Life insurance product.

In this respect you confirm that you have provided these persons with all the information required under applicable data protection law, notably regarding their data protection rights, and received from these persons their authorisation for the processing and transfer of their personal data to us.

### **Disclosures to Service Providers and / or Third Parties**

Personal data relating to you which is collected from you or provided by you or on your behalf may be handled by Service Providers appointed by the Company and any of related, associated or affiliated companies within the Inora group or the Service Providers’ groups for the purposes specified above. These Service Providers will be obliged to adhere to the data protection laws of the countries in which they operate.

Directors: Corinne Bulet (French), Michael Clifford, James Kelly, Peter Madden, Brendan McCarthy, Marlène Pradeilles (French), Francis Yung (French),

Registered in Ireland No. 329745. Registered Office: 3<sup>rd</sup> Floor, IFSC House, IFSC Dublin 1; Ireland

Authorised by the Central Bank of Ireland

The Company may disclose your personal data to other third parties where required by law or for legitimate business interests. This may include disclosure to third parties such as auditors and the Central Bank of Ireland, other regulatory bodies, taxation authorities and technology providers.

### **Transfers Abroad**

For the purposes of the arrangement, management, redemption or termination of your insurance product with Inora Life, the personal data collected from you or provided by you or on your behalf will not be transferred outside of the European Economic Area (“EEA”) by our Service Providers.

In order to afford you with adequate data protection of your personal data in these circumstances, the Company has taken the necessary steps to ensure that appropriate safeguards have been put in place to protect the privacy and integrity of such personal data, in particular by ensuring the implementation of model contracts by the Service Providers and their affiliates. Please contact the Data Protection Officer, Inora Life DAC, IFSC House, IFSC, Dublin 1, Ireland or email [inora.assu@socgen.com](mailto:inora.assu@socgen.com) should you wish to obtain information concerning such safeguards.

### **Data Retention Period**

The Company and its appointed Service Providers will retain all information and documentation provided by you in relation to your investment in an Inora insurance product for such period of time as may be required by Irish legal and regulatory requirements, being at least six years after the period which you have fully surrendered the insurance product or the date on which you had your last transaction with us, whichever is the later.

Limited policyholder information may be held, in narrow circumstances, for longer periods by the Company to allow for compliance with other various legislation requiring such information (e.g. Unclaimed Life Assurance Policies Act).

### **Your data protection rights**

Please note that you have the following rights under the GDPR. In each case, the exercise of these rights is subject to the provisions of the GDPR:

- (i) You have a right of access to and the right to amend and rectify your personal data.
- (ii) You have the right to have any incomplete personal data completed.
- (iii) You have a right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you carried out by the Company infringes the GDPR.
- (iv) You have a right to be forgotten (right of erasure of personal data).

Directors: Corinne Bulet (French), Michael Clifford, James Kelly, Peter Madden, Brendan McCarthy, Marlène Pradeilles (French), Francis Yung (French),

Registered in Ireland No. 329745. Registered Office: 3<sup>rd</sup> Floor, IFSC House, IFSC Dublin 1; Ireland

Authorised by the Central Bank of Ireland

- (v) You have a right to restrict processing.
- (vi) You have a right to data portability.
- (vii) You also have the right to object to processing where personal data is being processed for direct marketing purposes and also where the Company is processing personal data for legitimate interests.

Where you wish to exercise any of your data protection rights against the Company, please contact us via the details provided below under “Contact Us”.

The Company or its Service Provider will respond to your request to exercise any of your rights under the GDPR in writing, as soon as practicable and in any event **within one month** of receipt of your request, subject to the provisions of the GDPR. The Company or its Service Provider may request proof of identification to verify your request.

#### **Failure to provide personal data**

As outlined in the section titled “**Purposes of Processing and Legal Basis for Processing**”, the provision of personal data by you is required for us to manage and administer your investment in an Inora insurance product and so that we can comply with the legal, regulatory and tax requirements referenced above. Where you fail to provide such personal data in order to comply with anti-money laundering/counter terrorist financing or other legal requirements, in certain circumstances, we may be prohibited from processing your surrender or claim payment.

#### **Contact us**

If you have any questions about our use of your personal information, please contact the Data Protection Officer, Inora Life DAC, IFSC House, IFSC, Dublin 1, Ireland or at the following email address [inora.assu@socgen.com](mailto:inora.assu@socgen.com).