

# CUSTOMER PRIVACY NOTICE

ABRIDGED VERSION

This Privacy Notice is dated 1st February 2021.

**IVALIFE Insurance Limited** (C 94404) of Centris Business Gateway II, Level 1D, Triq is-Salib tal-Imriehel, Central Business District, B'kara CBD 3020 ("**IVALIFE**"; "**we**", "**us**" or "**our**"), and its affiliated and associated entities, respect your privacy and are wholly committed to protecting the confidentiality and security of your personal data.

This document provides an abridged overview about how we collect and process your personal data when you:

- request a quotation from, or make or submit a proposal to, us for any of our products or services or interact with us in any other manner, including by or through our website at [www.iva.life](http://www.iva.life);
- apply for, purchase or otherwise use any of our products or services, including through any issued policy; or
- make a claim under or in connection with any product, policy or service obtained from us;

and, in each case, whether directly with us or through any of our appointed intermediaries.

This also includes any data that you provide for and in relation to our newsletters, updates, events and other marketing and promotional communications.

It also concerns the personal data which we process about **policy beneficiaries**.

A complete version of our Customer Privacy Notice, which set outs and describes our data processing activities in further detail, can be accessed at [www.iva.life](http://www.iva.life).

It is important that you read both this **abridged version** as well as the **complete version** of our privacy notice.

## ADDRESSEES

Our Customer Privacy Notice is addressed to both policyholders and beneficiaries.

Where we have entered into an agreement with a company or individual (the "**Policyholder**") to provide insurance cover for a specified group under a group insurance policy, such as for example a group benefit plan, we will in such cases also need to process the personal data of the individuals who have been named or enrolled as a beneficiary under that policy (each referred to as a "**Beneficiary**"). An example of this would be a Group Life Insurance cover. The same situation also applies where you, as the proposer or Policyholder, have named, added or otherwise included specified individuals as a beneficiary under your requested policy (also referred to here as a "**Beneficiary**").

This Notice therefore also explains how we process personal data about such Beneficiaries and should be circulated accordingly. Thus, where a Policyholder provides or intends to provide us with any information about a Beneficiary, that Policyholder must circulate our Notice to that Beneficiary and procure and confirm to us that the Beneficiary is fully aware that you have shared his or her personal data with us and understands that we will collect and process that personal in accordance with, and for the purposes set out, in this Notice.

Our privacy notice should therefore be circulated accordingly - both the abridged and the complete version.

In that context, "you" is used to refer to both Policyholders and Beneficiaries.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

We are a controller of your personal data. We process your data in an appropriate and lawful manner, in accordance with the Maltese Data Protection Act, Chapter 586 of the Laws of Malta (the "**Act**"), including its subsidiary legislation, and the General Data Protection Regulation (Regulation (EU) 2016/679) (the "**Regulation**" or the "**GDPR**"), each as may be amended, supplemented or replaced from time to time.



**A:** Centris Business Gateway II, Level 1D, Triq is-Salib tal-Imriehel, Central Business District, B'kara CBD 3020  
**T:** 2226 9500 **E:** [info@iva.life](mailto:info@iva.life) **W:** [www.iva.life](http://www.iva.life)

IVALIFE Insurance Limited ("the Company") is authorised and regulated by the Malta Financial Services Authority to carry on long term insurance business under the Insurance Business Act (Chapter. 403 of the Laws of Malta).

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This Notice aims to ensure that you are fully informed on how IVALIFE (as your insurance provider) will collect and process your personal data. It informs you about the items of personal data which we will collect about you and describes how we will handle it (regardless of the way you interact with us, whether by email, phone, through an intermediary or otherwise), and in turn, also tells you about (i) our obligations in regard to processing your personal data responsibly, (ii) your data protection rights as a data subject and (iii) how the law protects you.

## 2. CONTROLLER

**IVALIFE**, as defined above, is the controller and responsible for your personal data.

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this Notice, and for handling any data subject requests. If you have any questions or requests, including any requests to exercise your legal rights as a data subject, please contact our DPO using the details set out below.

### CONTACT DETAILS

**Full name of legal entity:** IVALIFE Insurance Limited  
**Email address:** [dpo@iva.life](mailto:dpo@iva.life)  
**Postal address:** Centris Business Gateway II, Level 1D, Triq is-Salib tal-Imriehel, Central Business District, B'kara CBD 3020

## 3. THE DATA WE COLLECT ABOUT YOU

During the course of our relationship (including at proposal and quotation stage), we will need to collect, use, store and transfer various items of personal data about you for various purposes associated with the scope of the products and services that we offer and/or our obligations at law. In that regard, we will generally process three main categories of personal data about you and, where applicable in the context of your policy, also your dependents:

- **Standard personal data** (for example, information which we use to contact you, identify you and enter into a relationship with you and to manage that relationship). Set out below is the data relevant to this category:
  - Identity Data;
  - Contact Data;
  - Coverage Data
  - Beneficiary Data;
  - Employment Data;
  - Financial Data;
  - Claims Data
  - Marketing Data; and
  - Usage Data.
- **Special categories of personal data.** This mainly applies where we have been engaged or requested to act as your life or disability or critical illness insurance provider (whether directly by yourself or where you have been included in a group policy procured by another person). In these cases, we will need to process certain health information relating to you (which may, depending on the type of cover, also include disability information) in order to be able to underwrite, issue, administer and provide you with your requested coverage.

This category generally comprises information about your current and previous physical and mental health, including details of any physical and/or psychological health or medical conditions (including disabilities) which you may be suffering from or may have suffered in the past.

We will generally receive or extract this health data from:

- applications or proposal forms which you have submitted to us;
  - any disclosures which you make in connection with an application, proposal form or a policy;
  - your claims history;
  - any medical reports requested or submitted in connection with a claim which you have made;
  - notes and reports about your history and any treatment or care which you have received or need in connection with a claim made with under a policy which you hold with us;
  - records of medical services which you have received; and/or
  - referrals provided from your existing or previous insurance provider.
- **Due diligence information** (namely information which we collect and receive in connection with our customer verification vetting checks, including against fraud and anti-money laundering databases).



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This information would mainly comprise the following:

- copies of your passport or national identification documents, proof of name and address, source of funds and source of wealth and assets information, bank references letters and certificates of good standing; and
- supplementary or supporting due diligence information collected on you from third-party and publicly available sources, such as public court documents and from electronic data searches, online KYC search tools, anti-fraud databases, sanctions lists and from general searches carried out via online search engines.

That said, it is possible that we may, through these verification and screening checks, collect and receive certain sensitive personal data about you, such as information about your possible political affiliations as part of our politically exposed persons (PEP) and/or sanctions checks and due diligence exercises.

We explain these data categories in greater detail on our website at [www.iva.life](http://www.iva.life).

Please note that these data categories are strictly indicative and not intended to be exhaustive.

We use different methods to collect data about you, which are explained on our website at [www.iva.life](http://www.iva.life).

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data for the purpose(s) for which we collected it, which include the following:

- to review and decide on your application;
- to determine whether to enter into a customer relationship with you or provide you with your requested cover;
- to issue, execute and implement the insurance cover;
- to fulfil our regulatory and legal obligations relating to AML, anti-bribery, fraud prevention, counter-terrorist financing, PEP checks, sanctions checks and customer due diligence and verification requirements;
- to fulfil any external mandatory reporting obligations that we may have to the local and overseas public and regulatory authorities or law enforcement agencies (including to the MFSA or the FIAU);
- for contract issuance, administration and performance purposes (including quotation, underwriting, policy administration, claims handling and settlement, renewals and premiums);
- to manage our relationship with you;
- for legal, tax and accounting purposes (e.g. reporting to tax authorities, and accounting record requirements);
- for billing, invoice and internal record keeping purposes;
- to collect and recover money which is owed to us;
- to detect, prevent, suppress and/or report fraudulent activity and/or any other criminal activity;
- to assist and cooperate in any criminal or regulatory investigations.
- to conduct our audit, compliance controls and other risk management functions;
- to market our products and services; and
- to permit us to pursue available remedies or limit any damages that we may sustain.

## 5. HOW WE SHARE YOUR PERSONAL DATA

We may have to disclose or share your personal data, including your submitted forms, with the parties set out below, each of whom operate as processors or as joint or independent controllers:

- intermediaries whom we have appointed to act as our agent and to sell our products/services on our behalf;
- our reinsurers, whom we have appointed to reinsure and mitigate our risks;
- your insurance broker;
- the policyholder or your broker if you are a member or a beneficiary under a policy taken out by that policyholder;
- your employer (or their broker) for coverage, premium or renewal administration purposes if you are a member or beneficiary under an insurance scheme or plan taken out with us by your employer;
- healthcare professionals, healthcare providers and clinicians used to assess, examine or support your application for a life insurance policy with us or any claims made by you under a policy;
- employers or representatives: if you receive a discount on your premium because you are part of a collective insurance, we use your personal data to periodically check with your employer or representative to see whether you are still entitled to this discount;
- suppliers and service providers whom we have engaged to receive and process claims on our or your behalf;
- our professional advisors (such as our auditors, accountants, insurance managers and legal counsel);
- other organisations where exchange of information is necessary for the purpose of fraud protection or credit risk reduction (including with other insurers);
- debt recovery agencies who assist us with the recovery of debts owed to us;
- to regulators, government bodies and tax authorities, when required by applicable laws;



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- to any relevant party, claimant, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal claims in accordance with applicable law and regulation; and
- to any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences in accordance with applicable law and regulation; and
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets (successors in title) Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, the new owners may use your personal data in the same way as set out in this Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and, in each case, any disclosure of your information will be strictly limited to the extent necessary.

We may also disclose your data if we are under a duty to disclose or share your personal data to comply with any legal obligation, judgment or under an order from a court, tribunal or authority. We may also transfer your personal data when we are required to do so by any judicial body, court order or order issued by a police authority.

## 6. INTERNATIONAL TRANSFERS

As we deal with many international organisations and use global information systems in connection with our business or to provide our products and services, we may need to from time to time transfer your personal data to outside the European Economic Area ("EEA") (i.e. the EU Member States plus Norway, Liechtenstein and Iceland). We will only do so to the extent necessary for the purposes stated in this Notice, including to: (i) provide our products or services to you; (ii) fulfil our contractual obligations to you or exercise our contractual obligations against you; (iii) comply with our legal or regulatory obligations or (iv) assert, exercise or defend a legal claim.

More detail on these third-country transfers and the safeguards which we apply can be found at [www.iva.life](http://www.iva.life).

## 7. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data (termed **data subject rights**). Please however note that data subject rights are not absolute rights or unreservedly guaranteed, but generally need to be balanced out versus other applicable laws and our statutory obligations.

- You may access your personal data and receive information about its use (access);
- You may have your personal data corrected and/or completed (rectified);
- You have the right to obtain the erasure of your personal data (right to be forgotten);
- You may have the use of your personal data restricted and/or object to the use of such data;
- You may receive your personal data in a portable format;
- You may withdraw your consent to the processing of personal data; and
- You may complain to the applicable supervisory authority for data protection issues.

As indicated, we may not always be able to comply with your data subject requests for specific legal reasons which will be notified to you, if applicable, at the time of your request.

More detail can be found in the complete version of our privacy notice at [www.iva.life](http://www.iva.life).

## 8. FURTHER DETAILS

For more information on the way we process your personal data, including with regards to our practices on data security and data retention and the lawful processing bases which we rely on to process your personal data, please access and read through the complete version of our privacy notice at [www.iva.life](http://www.iva.life).



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## 9. CONCLUSION

We reserve the right to make changes to our privacy notice in the future, which will be duly notified to you. If you have any questions regarding our privacy notice, or if you would like to send us your comments, please contact us today or alternatively write to our data protection team using the details indicated above.



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