

Privacy Statement

Last updated on 22 May 2018

We are committed to respecting and protecting your privacy. Please take a moment to familiarise yourself with our data protection principles and practices.

Ancoria Insurance Public Ltd (referred to as “we”, “us”, “our”, “Ancoria”) is committed to protecting your privacy and handling your personal information in an open and transparent manner.

No matter where you reside, your personal information will be processed in accordance with our data protection practices. Please find below some information on the basis on which we collect, process and otherwise use your personal information.

The purpose of this Privacy Statement is to:

- Provide an overview of how Ancoria collects and processes your personal information.
- Inform you of the various rights you have under the data protection legislation.
- Provide information regarding the purposes for which we share your personal information with third parties.

Below you will find helpful information about:

- ***Definition of “personal information”***
- ***Whose personal information we collect***
- ***What personal information we collect and from where***
- ***Why and on what legal basis we collect and process your personal information***
- ***Minors’ personal information***
- ***Access to your personal information***
- ***Storing of your personal information***
- ***Protection of your personal information***
- ***Sharing of your personal information***
- ***Transfer of your personal information to an international organisation outside the EU***
- ***Recruitment***
- ***Third-party data protection practices***
- ***Data Privacy rights under the GDPR***
- ***Updates to our data protection practices***
- ***How to contact us***
- ***Use of website cookies***

Definition of “personal information”

Personal information means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, 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.

Whose personal information we collect

We collect personal information about all our customers, potential customers and users of our websites <http://www.ancoria.com/en>, <http://www.ancoria.com>, <http://www.ancoria.com.cy> and <https://online.ancoria.com>.

Where we are provided with personal information regarding **third parties** with whom we do not come into direct contact, such as beneficiaries, we will make our best efforts to provide such third parties with the information set out in this Privacy Statement directly, except where, due to the circumstances, it would be impossible or very difficult for us to do so or where providing such information to third parties would affect the objectives of the processing.

What personal information we collect and from where

We will only collect personal information to the extent required to cover the purposes of processing outlined to you at the time of collection.

If you are a prospective or existing customer or an authorised representative/agent, officer or beneficial owner of a legal entity which is an existing or prospective customer, we may collect the following personal data about you: name, surname, residential and business address, gender, telephone number, email address, photo identification, authentication data such as signature, date and place of birth, job title/profession, financial information such as source of wealth, bank account information, details of any transactions carried out through our Ancoria Online Service website, prominent public function status (PEP), Foreign Account Tax Compliance (FATCA) status, tax residence and Tax Identification Number (TIN) and investment strategy and personal investment objectives.

If you are a user of our websites, we may collect the following personal data about you: the country or territory from which you are accessing our websites and technical information such as the Internet Protocol (IP) address used to connect your computer to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, information about your visit including the full Uniform Resource Locators (URL) clickstream to, through and from our websites (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouseovers) and methods used to browse away from the page.

We obtain your personal data mainly through any information you provide us with and specifically through:

- Any information you enter on our websites or forms and applications.
- Any information we receive from an individual or legal entity who has a policy with us under which you are the insured or beneficiary or a third party entitled to benefit from the performance of the policy.
- Any information you provide to us by correspondence, telephone, fax, email or otherwise, including any telephone number or email you have used to contact our Customer Service team.
- The country or territory in which you are located or from which you are accessing our websites.
- Your bank account information and details of any transactions carried out through our Ancoria Online Service website.
- Information we receive about you from selected third parties such as business partners, suppliers and sub-contractors and/or analytics and search engine providers.
- Any information collected automatically through the use of cookies or similar technology on our websites.
- Information from publicly available sources, such as the Department of Registrar of Companies and Official Receiver, registers, the press, media and the Internet.

We may ask you to provide personal information anytime during your communications with us. You are not required to provide it to us, but, if you choose not to do so, we may not be able to provide you or continue to provide you with our products and services or respond to any queries you may have as we will not be

able to comply with our statutory obligations and/or perform our contractual obligations.

We do not normally request sensitive personal information about you. If we ever need to request such information, an explicit consent will be requested of you in relation to its processing by us.

Why and on what legal basis we collect and process your personal information

We process your personal data when we are allowed by law to do so for one or more of the following reasons:

- To observe and perform any contractual obligations based on a contract we have with you as well as communicate with you in the course of our business relationship or in order to take certain steps prior to entering into a contract with you.
- To comply with applicable laws and regulatory obligations (either within or outside your country of residence) including, without limitation, any applicable Cypriot insurance legislation, Orders and Guidelines of the Cypriot Superintendent of Insurance, laws relating to Know-Your-Customer (KYC) and Anti-Money Laundering (AML) procedures, sanctions and anti-terrorism requirements, tax laws including the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS) and laws governing the Deposit Guarantee and Resolution of Credit and Other Institutions Scheme.
- To comply with any legal processes and respond to any requests from public and governmental authorities (either within or outside your country of residence).
- For the purposes of safeguarding legitimate interests pursued by us or by a third party, provided those interests are not overridden by your interests and fundamental rights. Examples of processing activities based on a legitimate interest include:
 - Preventing, detecting, investigating or taking action regarding illegal activities, including suspected crime, fraud and money laundering.
 - Establishing, protecting and defending our own and our customers' and users' legal rights, privacy and safety and pursuing any available remedies or mitigating any losses.
 - Initiating legal claims and preparing our defence in litigation procedures.
 - Resolving complaints and handling requests made by you in relation to your data protection rights such as for data access or correction.
 - Analysing and managing insurance, financial and other commercial risks.
 - For research and statistical purposes in order to develop our products, services, systems and business relationships.
 - Managing our business operations and complying with our internal policies and procedures, including those relating to auditing, finance and accounting, billing and collections, IT systems, data and website hosting, data analytics, business continuity and records, document and print management.
 - Developing and improving our IT and systems security.
- You have provided us with your specific consent for the processing of your personal information for reasons other than those set out above such as to allow us to provide you with marketing information concerning our products or services. You have the right to withdraw your consent at any time by contacting our Data Protection Officer.

Minors' personal information

We recognise the importance of protecting the privacy of minors. We will only collect personal information about minors with the consent of their parents or legal guardians.

Our website is not designed to be used or accessed by minors nor do we provide any online services to minors. Under the current Privacy Statement, "minors" are individuals under the age of 18.

Access to your personal information

Your personal information may only be accessed by our employees under strict confidentiality for the sole purpose of performing their duties.

Storing of your personal information

We store information in physical and electronic form, in one or more combined files, which are retained by us in accordance with applicable laws and regulations.

We will store your personal information for as long our business relationship lasts. We will not store personal information for longer than required to fulfil the purposes it was collected for, including the purpose of satisfying any legal, accounting, or reporting requirements and obligations.

To determine the appropriate retention period for storing types of personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised process or disclosure, the purposes for which it was collected and whether we can achieve those purposes through other means, as well as the applicable legal requirements. Details of retention periods for different aspects of your personal information may be provided upon request.

Protection of your personal information

We take all appropriate and lawful technical, physical, legal and organisational measures against accidental or unlawful destruction, accidental loss, alteration, unauthorised dissemination or access and any other form of unlawful processing or violation of confidentiality.

For access to our Ancoria Online Service website, we give you a unique password to log in. It is your responsibility to always keep this password confidential. We recommend that you sign out of your account or service at the end of each session and you close your product terminal or browser window when you have finished your work, especially if you share a computer with someone else or if you are using a computer in a public place. Our Ancoria Online Service website is encrypted using 256-bit encryption of communication.

Please note that although we do our best to protect your personal information, unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. We are not responsible for the security of data transmitted to our websites or for non delivery of an email. If we believe that the security of your personal information in our possession or control may have been compromised, we will notify you as soon as possible in accordance with applicable laws and regulations. If you have reason to believe that your interaction with us is no longer secure, you must notify us immediately.

Sharing of your personal information

We may need to make your personal information available to selected third parties, such as:

- Analytics and search engine providers that assist us in the improvement and optimisation of our websites.
- Advertisers and advertising networks that require personal information to select and serve relevant adverts to our users. Please note that we will not disclose information about identifiable individuals to our advertisers, but we may provide aggregate information about the users of our websites.
- External third-party service providers, such as actuaries, auditors, lawyers, IT systems, support and hosting service providers, printing, advertising, marketing providers (provided you have consented to the processing of your personal information for marketing purposes), banks and financial institutions that service our accounts and other third-party service providers that assist us in our business activities.
- Governmental or other public authorities, if necessary to comply with applicable laws and regulations (either within or outside your country of residence) or legal processes or in order to respond to

requests from governmental or other public authorities (either within or outside your country of residence).

- Purchasers, prospective purchasers during any actual or proposed reorganisation, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business or assets.

Any disclosures of personal information will be in accordance with applicable laws and regulations and provided that suitable safeguards or agreements are in place or provided you have provided relevant consent. We will ensure that any third-party processors appointed by us to process personal information on our behalf also comply with the GDPR and applicable local data protection legislation.

Transfer your personal information to an international organisation outside of the EU

In case you wish to enter into an agreement with a third-party organisation based outside the EU through your Ancoria Life Policy, you will be responsible for ensuring that the organisation to which your personal information will be transferred complies with EU data protection standards.

Recruitment

We will treat all applicants' personal information in strict confidence and will not disclose it to anyone, except where disclosure is required or permitted by law or by our regulator or where you have given us your prior consent to disclose it. In case an application is not successful, we will keep the applicant's CV in our records for 6 months after the conclusion of the recruitment process, unless we have reasons to retain some of the information for longer, in accordance with applicable laws and regulations.

Third-party data protection practices

We are not responsible for the data protection information or practices of any third parties, including parties operating any website or service to which our websites refer. The inclusion of a link on our websites does not imply endorsement of the linked website or service by us, therefore you are advised to review third party data protection policies and practices before submitting personal information to them through their website or otherwise.

Data privacy rights under GDPR

Customer and user privacy rights include:

- Right to access and receive a copy of your personal information kept on our records and databases.
- Right to request the correction or updating of personal information kept on our records and databases. Please note that we may need to verify the accuracy of the new data you provide to us.
- Right to request for personal information to be erased or destroyed where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local laws and requirements. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Right to object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on the ground that it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. Please note that, in some cases, we may have compelling legitimate grounds to process your information which override your rights and freedoms.
- Right to request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Right to request for certain processing to be restricted for any of the reasons below:
 - The personal information is not accurate.
 - The personal information is used unlawfully but you do not want us to erase it.

- The personal information is not relevant, but you want us to keep it in our files as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your personal information but we need to verify whether we have overriding legitimate grounds to use it.
- Right to withdraw your consent or object to the processing of your personal information by us where we are relying on consent to process your personal information. This will not affect the lawfulness of any processing carried out before you withdraw your consent. Should you decide to exercise this right, please note that we may need to reject an application request from you or terminate any existing business relationship or refuse to execute any orders, instructions or transactions until we process such request.
- Right to be notified of a data breach likely to result in a high risk to your rights and freedoms.
- Right to lodge a complaint with the relevant data protection authority.

Individuals for whom we hold personal information can exercise their privacy rights at any time by submitting a written request to our Data Protection Officer, using the contact details provided below. All requests relating to privacy rights will be dealt with promptly in accordance with applicable laws and regulations.

Updates to our data protection practices

We may need to review our data protection practices from time to time in order to take account of changes in our business and legal requirements. Any updates will be posted in this section of our websites. We will notify you about changes to this Privacy Statement by placing a notice on our website. We strongly recommend that you check back frequently to ensure that you have been notified of any updates or changes which may affect you.

How to contact us

We understand that you may have questions or concerns about our data protection practices or may wish to exercise your rights or file a complaint.

For this purpose, you may contact our **Data Protection Officer** via mail at 36 Laodikias street, Strovolos, 2028 Nicosia, Cyprus or via email at dpo@ancoria.com.

You also have the right to complain to the Office of the Commissioner for Personal Data Protection. Information on how to submit a complaint may be found at <http://www.dataprotection.gov.cy>.

Use of website cookies

Currently, our website uses small text files stored in a user's browser files known as cookies. Cookies are used to improve website and the experience of our users. For additional information about how we use cookies, please view our [Cookie Policy](#).

Important note:

This Privacy Statement and any data subject rights set out herein shall take effect on 25 May 2018, pursuant to the entry into force and application of the General Data Protection Regulation (2016/679) across the EU. Until then, all the processing of personal data by Ancoria Insurance Public Ltd shall be carried out in accordance with the provisions of the Processing of Personal Data (Protection of Individuals) Laws 2001-2012 (138(I)/2001).

The date of the last update appears at the top of this page.