

Octium International Insurance Agent AG

Privacy Notice

(Pursuant to art. 13 and 14 of the EU Regulation 2016/679 "GDPR")

Version	1.0
Date	16 November 2020

When carrying out its business activities, Octium International Insurance Agent AG (hereinafter "**Octium International**") will process Personal Data that it is committed to protecting the confidentiality, integrity, and privacy.

Personal Data means any information relating to a natural person (hereinafter the "**Data Subject**") which can identify that specific person.

Data Subjects are invited to read this Privacy Notice carefully so that they understand how Octium International will use Personal Data and what rights are in force under data protection law.

With reference to the provisions of the EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter "**GDPR**" or "**Regulation**"), Octium International, in its capacity as the "Data Controller", hereby gives to Data Subjects the following information on Personal Data collection and processing activity.

1. Data Controller and Data Protection Officer

According to GDPR, Data Controller means the natural or legal person which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

The Data Controller is:

Octium International Insurance Agent AG
headquartered in Austrasse 61, LI-9490 Vaduz, Liechtenstein.

Pursuant to Art. 37 of GDPR, a "Data Protection Officer" has been designated to monitor and oversee the collection, processing and storing of Personal Data by the Octium International as Data Controller.

For any information, questions or requests regarding Personal Data processing, storing, protection, and/or to exercise the rights as stated in the Regulation, listed in par. 9 of this Privacy Notice, as laid under by art. 15 and following, Data Subjects can contact the Data Protection Officer of Octium International:

- by email at dataprotection.FL@octiumgroup.com, or
- by written letter to the attention of the Data Protection Officer at the registered address of the Octium International



2. Purposes of data processing

To allow the correct execution of its activities to clients and contracting parties, Octium International collects Data Subject's Personal data, some of which can be provided by the Data Subject itself or by third parties, fulfilling legal obligations.

In particular, for the appropriate execution of the insurance distribution activities, the Data Subject's data are processed by Octium International within the scope of the following interests:

- estimate, drafting, subscription of insurance policies and fulfilment of related obligations;
- assistance for premium payments;
- assistance for claim settlement, payment or execution of any other related performances;
- reinsurance or coinsurance;
- prevention and detection of insurance frauds and related legal actions;
- exercise or defence of rights arising from the contractual relationship;
- fulfilment of other specific contractual or legal obligations;
- fulfilment of obligations arising from the competent authorities and from supervisory authorities;
- analysis of new insurance markets or products or services;
- internal management and supervision;
- statistical activities, also for fee purposes;
- assessment of potential financings for the premium's payment;
- antifraud activities with screening online;
- anonymous use of data for analyses and insurance market statistics.

3. Categories of collected data

Octium International collects and further processes only as much Personal Data as is necessary for it to provide Data Subjects with relevant services or to enable Data Subjects to submit a question in relation to such services.

The following is a list of the Personal Data that Octium International may collect and further process for Data Subjects.

As regard insurance distribution activities, all Personal Data are collected and processed in the context of assessing Data Subject's application for or executing their insurance policy and, depending on Data Subjects capacity, as an insurance policy applicant or active policyholder, insured person or beneficiary.

It is important that Data Subjects' Personal Data is accurate and current.

Data Subjects should keep Octium International informed if their Personal Data changes during their mutual relationship.

3.1 Common data

Information for identification and communication purposes:

Name, date of birth, gender, marital status, photographic identification, nationality, postal address, tax residency, tax identification number, telephone number, email address, occupation,



citizen status and family details (e.g., number of children, if applicable), passport/identification information, signature.

Information for the purpose of determining source of funds and source of wealth:

Bank name, bank account number, IBAN, bank account statements, income details and personal assets, investment profile.

Other Information:

Information relating to the execution of insurance policies and specifically any payments, contributions and/or profits made, any communications received including requests, queries or complaints the relevant person may have.

Information relating to any relevant stakeholder's potential implication as a politically exposed person, to anti-money laundering and anti-terrorist financing checks and to any FATCA/CRS tax implications possibly occurred.

3.2 Special categories of Personal Data

Medical Information for insurance underwriting purposes:

Personal medical history including information on mental or physical health and prescription information etc.

Under no circumstances genetic data are collected, stored or further processed.

4. Legal basis of data processing

Octium International collects and further processes Personal Data under the following lawful bases and for the following purposes:

Contract (Art. 6.1.b GDPR)

As laid under by Art. 6, par. 1, lett. b) of the Regulation, the legal basis of the processing is the fulfilment of a contract between the parties and the execution of precontractual measures adopted under the Data Subject's request.

As regard insurance distribution activities, it is necessary for Octium International to process Personal Data in order to assess application for a contract (i.e insurance policy) that Octium International does intermediate and to support the execution of such insurance policy. This includes running underwriting checks and client's assessments, communicating with the client and with persons appointed by it, handling any queries, requests, or complaints in the context of the insurance policy and in general providing with the services related to the insurance policy.

Therefore, the provision of Personal Data by the Data Subject is necessary for the conclusion of the contract.

Legal Obligations (Art. 6.1.c GDPR)

In accordance with applicable legislation, including tax and other regulatory obligations, Octium International may process Personal Data in order to establish identity, residence, and tax status of Data Subjects for the prevention of tax evasion, money laundering and terrorist financing, to fulfil requirements by law to screening persons connected with insurance policies for the prevention of terrorist and other criminal activities, to comply with binding requests from



regulatory bodies, including the Finanzmarktaufsicht Liechtenstein or any competent tax authorities, to comply with court orders arising from civil or criminal proceedings.

Legitimate Interests (Art. 6.1.f GDPR)

It is in Octium International's legitimate interests to process Data Subjects' Personal Data in the context of establishing and defending Octium International's legal rights and those of its affiliated companies, to manage their internal administrative activities, including security of information systems, to analyse services, to host data and applications, to manage internal controls and audits, as well as in order to locate any instances of fraud.

When required, it is further in Octium International's legitimate interests to process strictly necessary Personal Data of persons other than the contracted parties (e.g., representative's postal address), in order to administer and execute relevant contractual relationships.

Consent (Art. 9.2.a GDPR)

With reference to the special categories Personal Data, the processing shall be carried out by Octium International on the ground of the specific and explicit consent, pursuant to Art. 9, par.2, lett. a) of the Regulation.

As regard insurance distribution activities, Octium International will request explicit consent in order to process Data Subject's health data, as provided through the medical questionnaire or as otherwise collected in order to clarify the said questionnaire. In the absence of such consent, Octium International will not be able to assist the Data Subject in concluding an insurance policy as an insured person, as a medical screening is a necessary industry standard before providing life insurance.

The data provision for commercial and marketing purposes is not necessary to the execution of the contract and shall be carried out grounding on the specific and explicit consent of the Data Subject.

5. Personal Data collection

Personal Data may be obtained or collected by Octium International:

From Data Subjects

When entering into discussion and relationship with Octium International, Data Subjects generally disclose some of their Personal Data to Octium International by:

- contacting Octium International;
- using Octium International's website;
- using Octium International's services and completing related forms.

Important Note:

When sending any forms by email, that contain Personal Data, Data Subjects are strongly advised to encrypt the attachments before sending. The encryption password may then be disclosed by phone or by separate email.

From third parties

Specialised intermediaries may communicate and transmit Personal Data as an autonomous Controller or authorised data processor to Octium International, for the enhancement and the management of the latter's services.



As regard insurance distribution activities, such intermediaries can be:

- health professionals where medical information is strictly necessary in order to underwrite or execute an insurance policy, including the processing of a claim and in accordance with Data Subject's explicit consent;
- Data Subject's financial intermediary or broker;
- the insurance policy applicant, subject to Data Subject's authorisation to the relevant person, as being an insured person or beneficiary
- a person otherwise connected to an insurance policy, following Data Subject's authorisation to the said person.

6. Processing modalities and data retention period

At Octium International, measures as provided by art. 32 of GDPR are in place to protect the security of Personal Data and to prevent Personal Data from being lost or being processed, accessed, altered or disclosed in an unauthorised manner.

Personal Data are mainly processed with paper, IT, electronic and telematic instruments/tools within the necessary limits to the fulfilment of the aforementioned purposes.

Personal Data are retained on paper and IT systems and on other types of systems, pursuant to the applicable law and to specific operational provisions as laid under by the Data Controller on Personal Data documentation retention.

With regard to the processing of the special categories of Personal Data, separate and specific principals and modalities are used in order to avoid any possible risk of unauthorised processing, of loss and destruction. Access to Personal Data is also limited to those employees, contractors, authorised data processors and other third parties who have a legitimate business reasons to obtain it, who are subject to a duty of confidentiality and who would process Personal Data only on instructions from Octium International.

Personal Data are stored in Octium International's premises Liechtenstein and Switzerland. Electronic data are stored with providers of data storage in both European Union and Switzerland. Switzerland is a jurisdiction outside the European Union and the European Economic Area that qualifies as a designated secure third country, for which the European Commission has confirmed Swiss national laws provide a level of protection for Personal Data that is comparable with EU law.

All reasonable steps are taken to ensure that Personal Data are protected and that any transfer of Personal Data is carefully managed to protect privacy rights.

Personal Data are retained for a period which is no longer than the necessary one to the fulfilment of the processing purposes, except for retention terms provided by law. Such retention period is subject to legal, tax and regulatory requirements.

In particular, Personal Data are generally retained for 10 years after the conclusion of the contractual relationship the Data Subject is part of, or 12 months after the issuing of the required quotations if no contractual relationships follows. Personal Data can be processed for any longer period of time if an interrupting and/or prescription suspending event occurs thus justifying the extension of the data retention period.

Specific procedures have been established to deal with any suspected data security breach and Octium International will notify Data Subject and any applicable regulator of any suspected breach, where legally required to do so.



7. Persons which Personal Data may be disclosed to

The Personal Data collected for the purposes mentioned in Art. 2 if this Privacy Notice can be shared with a select number of individuals and companies, as necessary:

- associated companies, controlled or under Octium International's common control or to parent companies;
- companies (possibly forming part of the Octium Group) that are under contract to provide services to Octium International, including document management, administration, payment facilitation, financial sanctions, and politically exposed person screening;
- subjects belonging to the so called insurance chain, such as, for example, insurers, co-insurers, re-insurers, health professionals, brokers, lawyers (of Octium International and of counterparts), advisors, translators, experts, companies providing IT services, filing services, printing and sending of correspondence services, inbox and outbox services, quality certification services, tax revision services and financial statement services and credit institutions for the execution of payments;
- regulators, tax authorities, or other bodies, in order to comply with regulation and law;
- courts and court appointed persons and/or entities;
- any other administrative, judicial or public authority or generally any legal or natural person to whom, by law or court decision, Octium International may be obliged or has a right to disclose such data.

Octium International will take all reasonable steps as required by law to ensure the privacy, confidentiality, integrity and safety of the shared Personal Data.

8. Data transfer to foreign countries

For the purposes as mentioned in Art. 2 of this Privacy Notice, Personal Data may be transferred outside Data Subject's national territory, also to non-EU countries (cf. Art. 6 of this Notice).

This transfer occurs by respecting the rights protection level provided by GDPR and by current legal framework on Personal Data protection.

9. Data subject rights

As laid under by Art. 15 and following of GDPR and in accordance with any applicable legislation, the Data Subject has the right in any time to:

- access and receive copies of its own Personal Data;
- have its own inaccurate and incomplete Personal Data, corrected and updated;
- request the deletion of its own Personal Data, where it is no longer necessary for Octium International to retain it;
- withdraw any consent provided for data processing, without affecting the processing that had already taken place;
- require the Data Controller to provide its own Personal Data to another provider (where that does not result in a disclosure of Personal Data relating to other persons);
- restrict the processing of its own Personal Data by the Data Controller;
- object to the processing of its own Personal Data, where it is processed based on the Data Controller's legitimate interests;
- submit a claim to the competent data protection authority.



If the Data Subject wishes to exercise any of these rights, he should contact the Data Protection Officer of Octium International, at the contact details provided under Art. 1 of this Privacy Notice. Data Subject should be expecting a reply from Octium International within one month or within a maximum of three months if the request is too complex or if Octium International has received too many requests.

If the Data Subject makes his/her request electronically, he will be provided with the relevant information electronically.

Octium International reserves the right to verify the Data Subject's identity by requesting that he provides with an identification document or different suitable documentation for this purpose (for example through the confirmation of Personal Data held by Octium International).

Octium International also reserves the right to request clarification on the request received, in order to ensure fast and targeted assistance.

10. Complaints

If the Data Subject believes that Octium International has processed his/her Personal Data incorrectly, he/she should contact first the Data Protection Officer of Octium International.

If the Data Subject is dissatisfied with how the Data Protection Officer has dealt with such complaint, he/she can complain to the competent Supervisory Authority.

The contact details of the Office of the Data Protection authority of Liechtenstein are:

Datenschutzstelle Fürstentum Liechtenstein

Städtle 38
Postfach 684
9490 Vaduz
Liechtenstein
Tel. (+423) 236 60 90

info.dss@llv.li
www.datenschutzstelle.li

11. Updating Data Privacy Notice

Octium International may update this Privacy Notice from time to time. Any updates will be made available on its Website.

Data Subjects are invited to review this Privacy Notice each time they use the services of Octium International or its website.

