

# Data Privacy notice

## 1. Introduction

Pursuant to art. 13 of EU General Data Protection Regulation 2016/679 on the protection of natural person with regard to the processing of personal data ("GDPR"), Octium International Insurance Agent AG (hereinafter referred to as "**Octium International**", "**We**" or "**Us**") hereby informs customers (hereinafter referred to as "**Customer**" or "**You**") about the processing and safeguarding of the Customer's personal data and the vested rights within his/her free collaboration with Octium International.

This Data Privacy Notice should be read in conjunction with our Cookie Policy which is also available on our website.

## 2. Data Controller and Data Protection Officer

As regard the processing of personal data, Octium International is acting in its capacity as "Data Controller", which means that We, alone or jointly with others, determine the purposes and the means of processing your personal data.

Data Controller	
<b>Octium International Insurance Agent</b>	A company constituted under the laws of Liechtenstein.
Trade Register	FL-0002.635.209-2
Registered office	Äulestrasse 74, FL-9490 Vaduz
Email	Info.FL@octiumgroup.com

Data Protection Officer	
The Data Controller has appointed a Data Protection Officer who can be contacted at the following address for the purpose of exercising data subject's rights provided for in Article 15 et seq. of the GDPR:	
Email:	dataprotection.FL@octiumgroup.com
Letter	To the personal attention of the Data Protection Officer, at the registered office of Octium International.

## 3. Purposes of data processing

Personal data processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, 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.

### 1.1 Processing of personal data for insurance purposes

We collect your private data either from You, being "Data Subject", or from authorised third parties (e.g., your personal advisor or relevant health professionals).

Your personal data is processed by Us in compliance with the current legal framework on personal data protection, also with provisions and confidentiality principles, for the only purposes linked to our exercise of the insurance intermediary activity and to the management and execution of the insurance contract of which You are a party.

In particular, for the appropriate execution of the insurance distribution activities, the processing of your personal data could be carried out to:

- estimate, draft, subscribe insurance policies and fulfil related obligations;
- assist with premium payments;
- assist with claim settlement, payment or execution of any other related policy transactions;
- exercise or defence of rights arising from the contractual relationship;
- fulfil our contractual or legal obligations;
- fulfil our obligations arising from the competent authorities and from supervisory authorities;
- assessment of potential financings for the premium's payment;
- anonymous use of data for analyses and insurance market statistics;

- comply with tax and other regulatory obligations, in order to establish your identity, residence, and tax status for the prevention of tax evasion, money laundering and terrorist financing;
- fulfil requirements by law to screening persons connected with policies for the prevention of terrorist and other criminal activities, to comply with binding requests from regulatory bodies.

#### **4. Categories of collected personal data**

We collect and further process only as much personal data as is necessary for us to provide you with our products and services or to enable you to submit a question in relation to our products or our customer service.

Below is a list of the personal data We may collect and further process for You in the context of assessing your application for or executing your insurance policy and depending on your capacity as a policy applicant or active policy holder, insured person, beneficiary.

##### **Your duty to inform us of changes**

It is important that your personal data is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### **1.2 Common personal data**

##### **Information to identify You and enable us to contact You**

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 to determine your 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 your policy and specifically any payments, contributions and/or profits made, any communications received including requests, queries or complaints You may have.

Information relating to your potential implication as a politically exposed person, to anti-money laundering and anti-terrorist financing as well as know-your-customer checks (incl. criminal convictions and offences) and to any FATCA/CRS tax implications You may occur.

#### **1.3 Special categories**

##### **Medical information for underwriting purposes**

Personal medical history, including information on mental or physical health, prescription information etc. Under no circumstances do We collect, store or further process your genetic or biometric data.

The provision of these data is necessary to the execution of the insurance contract of which You are a party. The refusal to provide this data might prevent its execution.

#### **5. Legal basis of personal data processing**

We collect and further process your personal data under the following lawful bases and for the following purposes:

##### **Contract**

It is necessary for Us to process your personal data as well as personal data of third parties included in your contract in order to assess your application for a concluding a contract (i.e., insurance policy) as an intermediary, as well as to support the execution of such insurance policy. This includes running underwriting checks and customer assessments, communicating with You and with persons appointed by You, handling any queries, requests, or complaints in the context of the insurance policy and in general providing you with the services set out in your contract.

Your personal data are processed on the basis of Article 6(1)(b) of GDPR, the processing is necessary for the performance of a contract to which You are a party or in order to take steps at your request prior to entering into a contract.

##### **Legal Obligations**

In accordance with applicable legislation, including tax and other regulatory obligations, Octium International may process your personal data in order to establish your identity, residence and tax status for the prevention of tax evasion, money laundering and terrorist financing, to fulfill legal requirements by law to screening people 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 tax authorities, to comply with court orders arising from civil or criminal proceedings.

Your personal data are processed on the basis of Article 6(1)(c) of GDPR, the processing is necessary for compliance with a legal obligation to which We are subject.

### **Legitimate Interests**

It is in our legitimate interests to process your personal data in the context of establishing and defending our legal rights and those of companies connected to us, to manage our internal administrative activities, including security of our information systems, to analyze our products and services, to host data and applications, to manage internal controls and audits, as well as in order to locate any instances of fraud.

It is further in our 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 the relevant contractual relationship.

Your personal data are processed on the basis of Article 6(1)(f) of GDPR, the processing is necessary for the purposes of the legitimate interests pursued by Us or by a third party. We consider that your interests or fundamental rights and freedoms which require protection of personal data do not override our legitimate interests to process the personal data mentioned herein above since such personal data are either processed to serve your direct interests or are secured in such a way that no detrimental impact on You can reasonably be expected from such processing.

### **Consent**

As an insured person, We will request your explicit consent in order to process your health data, as provided through the Medical Questionnaire or as otherwise collected in order to clarify the said questionnaire.

Please be advised that in case You do not provide the consent to process your health data, We will not be able to assist You in taking out the insurance contract with You as an insured person, as the pre-contractual medical screening is a necessary industry standard before providing life insurance. You may withdraw such consent on the processing of your health data by contacting Us at any time, however this may lead to the cancellation of your insurance contract.

We also collect your personal data where You are not a policyholder but are connected to a policy, e.g. where You are a beneficiary, the representative of a policyholder, a life assured etc.

The provision of data for commercial and marketing purposes is not necessary for the conclusion of the contract. It will therefore be carried out on the basis of your specific and express consent.

Your personal data are processed on the basis of Article 9(2)(a) of GDPR, the processing by the Data Controller will be carried out only following the release of a specific and express consent.

## **6. Personal data collection**

### **Personal data You provide**

We collect personal data from you when:

- You contact Us
- You use our website (for more information, see our Cookies Policy)
- You use our services and fill in related forms
- You use your insurance policy.

**Important Note:** When you send any forms by email, that contain personal data, we strongly advise that you encrypt the attachments before sending. The encryption password may then be disclosed by phone or by separate email.

### **Personal data provided by authorised third parties**

We also collect your personal data from:

- health professionals where medical information is strictly necessary in order to underwrite or administer your insurance contract, including the processing of a claim and in accordance with your explicit consent;
- Intermediary or financial broker of the Data Subject;
- the policy applicant, where You are connected to a policy e.g., beneficiary, representative of a policyholder, life assured etc., following your authorization of that person, to release your personal data to us;
- a person otherwise connected to a policy, following your authorization of that person.

### **Personal data collected from You about other persons**

We may collect personal data from You that relates to the following persons:

- Trustees
- Beneficiaries
- Assignees

- your health professionals
- your legally appointed representatives.

The personal data We collect with respect to these persons is limited to name, address and, where relevant, identifier number, and is used only for identification purposes.

We will ensure that any personal data You provide to us that relates to any person, will receive the same level of protection and privacy as described in this Data Privacy Notice.

#### **Your duty to inform other persons that You are releasing their personal data**

Before You disclose any personal data to us in connection with another person, You should:

- inform that person about the content of this Data Privacy Policy
- obtain permission from that person, to release their personal data.

### **7. Personal data processing modalities**

Your provided personal data can be processed other than in paper form with electronical and automatized means or tools, throughout adequate systems and procedures thus ensuring data security and confidentiality pursuant to Art. 32 and following of the GDPR.

We have measures in place to protect the security of your personal data and to prevent your personal data from being lost or being processed, accessed, altered or disclosed in an unauthorised manner.

Your personal data is stored in systems in our premises in Liechtenstein and Switzerland, with providers of data storage in the European Union ("EU"), European Economic Area ("EEA") and Switzerland. We take all reasonable steps to ensure that your data is protected and that any transfer of personal data is carefully managed to protect your privacy rights.

We also limit access to your personal data to those employees, contractors, Data Processors and other third parties who have a legitimate business reason to obtain it, who are subject to a duty of confidentiality and who process your personal data only on our instructions.

We have procedures in place to deal with any suspected data security breach and will notify You and any applicable regulator of any suspected breach, where We are legally required to do so.

### **8. Data recipients – personal data communication**

Personal data collected to fulfil the aforementioned contractual obligations can be also known, in addition to Us in quality as Data Controller, by our employees and collaborators, by associated companies (i.e., controlled or under Octium International's common control, or parent companies), by subjects belonging to the so called insurance chain, by competent authorities, by the judicial authority, by lawyers, by subjects whose right to access to such data is provided by the legal or regulatory framework, each in their capacity of "**Authorised Person**" or "**Data Processor**" which shall process data only to fulfil their duties, in the EU, EEA or in any jurisdiction outside the EEA that qualifies as a designated secure third country.

To this end, where applicable, we will have entered into corresponding data processing agreements with any third-party service provider under contract to us.

The complete and updated list of Authorised Person and Data Processor your personal data may be shared with, as well as the list of the categories of person which can become aware of those data, are available in our Group Data Privacy Notice on <https://www.octiumgroup.com/privacy-policy/>.

### **9. Direct Marketing**

We may send You details of similar services to those you have enquired about or purchased from Us previously. You can opt out of receiving this information from Us at any time by contacting Us at the above address or use the opt-out procedure provided in any promotional message You receive from Us.

We will never share or sell your information to any other party for marketing purposes.

### **10. Sharing your person data outside the European Union or European Economic Area**

The personal data we collect from may be transferred to, and stored in Switzerland, which is outside the EEA. Switzerland is a designated secure third country which means that the European Commission has confirmed Swiss national laws provide a level of protection for personal data that is comparable with EU law.

## 11. Data retention period

Data shall be retained for the whole duration of the insurance contract concluded by You and for 10 years after its termination due to any cause.

## 12. Data Subject's rights

You have the right to:

- access and receive copies of your personal data;
- have your inaccurate and incomplete personal data, corrected and updated;
- request the deletion of your personal data, where it is no longer necessary for Us to retain it;
- withdraw any consent provided for your personal data processing, without affecting the processing that had already taken place and without prejudice to the lawfulness of the processing carried out before the withdrawal;
- require Us to provide your personal data to another provider (where that does not result in a disclosure of personal data relating to other persons);
- restrict the processing of your personal data by Us;
- object to the processing of your data, where processed based on our legitimate interests;
- submit a claim to the competent Data Protection Authority.

If You wish to exercise any of these rights, You should contact our Data Protection Officer, at the contact details provided under section 2.

You should be expecting a reply from us within one month of receipt of your request, unless the request is of a significant complexity or we have received too many requests, in which case the deadline may be extended for a further month. We will inform You about such cases within one month.

If You make your request electronically, we will provide you with the relevant information electronically.

We reserve the right to verify your identity by requesting that You send us an identification document or different suitable documentation for this purpose (for example through the confirmation of personal data held by the Company).

We also reserve the right to request clarification on the request received, in order to ensure fast and targeted assistance.

## 13. Complaints

If You believe We have processed your personal data incorrectly, You should contact our Data Protection Officer at the contact provided under section 2.

If You are dissatisfied with how our Data Protection Officer has dealt with your complaint, You can complain to the competent Supervisory Authority in Liechtenstein.

<b>Liechtenstein</b>	Datenschutzstelle Kirchstrasse 8, Postfach 684 FL-9490 Vaduz Liechtenstein
	Tel: +423 236 60 90 Fax: +423 236 60 99
	E-Mail: <a href="mailto:info@dss.llv.li">info@dss.llv.li</a>

## 14. Effective date and updating our Data Privacy Notice

This Data Privacy Notice was last updated on December 2024

Our comprehensive Privacy Notice is at your disposal anytime either on our website ([www.octiumgroup.com](http://www.octiumgroup.com)) or by simple request to our representatives.

We may update, change, amend or modify our Data Privacy Notice from time to time. Any updates will be made available on our website, or directly communicated to You, if material.

Please review this Privacy Notice each time You use our services.

## 15. Explicit consent for personal data processing

With reference to the special categories personal data and to specific marketing purposes, the data processing in accordance with this Data Privacy note shall be carried out by Octium International on the ground of the below Data Subjects' specific and explicit consent.