

# Privacy notice

SWISS LIFE GLOBAL SOLUTIONS

## Introduction

Swiss Life Global Solutions protects the privacy and personal data of its customers (and/or their employees), service providers (and/or their employees), partners (and/or their employees) as well as the privacy and personal data of applicants, prospects, website and building visitors and, as the case may be, third parties, in compliance with applicable laws including the Regulation (EU) 2016/679 of the European parliament and of the council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter referred as the “GDPR”).

Swiss Life Global Solutions is represented by Swiss Life Luxembourg S.A., with registered offices at 2-6 rue Eugène Ruppert, L-2453 Luxembourg, Grand-Duchy of Luxembourg and registered with the Luxembourg Trade and Companies Register under number B 22.663, Swiss Life Liechtenstein A.G., with registered offices at In der Specki 3, 9494 Schaan, Principality of Liechtenstein and registered with the Liechtenstein Commercial Register under the number FL-0002.121.006-0, and Swiss Life Singapore Pte. Ltd., with registered offices at 250 North Bridge Road, #37-04, Raffles City Tower, Singapore 179101, Republic of Singapore and registered with the Singaporean Commercial Register under the number 200913694D, in the person of its legal representatives (each legal entity acting as separate data controller exclusively towards the personal data processing activities conducted by it and hereinafter referred as “**We, Our and Us**” as the case may be).

This general Privacy Notice is designed to inform each of you (acting as data subject and hereinafter referred as “**You, Your and Yourself**” as the case may be) about the personal data which We collect via Our portal as per the following link <https://www.swisslife-global.com> (hereinafter referred as the “**Website**”) and via other means as described hereunder, why We collect such personal data, on which legal grounds and how We will handle personal data You provide Us with and personal data that We learn about You from Your visit to the Website, from partners or from Our customers. Your use of the Website implies Your acknowledgment of this Privacy Notice.

## Legal grounds for processing

Pursuant to Article 6 of the GDPR and as further detailed hereunder, We process Your personal data (hereinafter referred as “**Personal Data**”) on the basis of:

- Your specific consent. Whenever the processing of Your Personal Data is based on Your consent, You have the right to withdraw such consent at any time, without affecting the lawfulness of such processing before the withdrawal of consent
- A contract to which You are party or in order to take steps to entering into such contract
- A legal obligation to which We are subject
- The performance of a task carried out in the public interest
- Legitimate interests pursued by Us or a third party.

## Personal Data collected and how it is used (purpose)

1. We may use the following categories of Personal Data collected directly from You on the basis of Your explicit consent:
  - To allow You to contact Us via Our contact and complaint forms, We may collect and process Personal Data

such as Your title, area, profile, first name, last name, company, country, telephone number, email address, contract number, the content of Your message, the content of Your complaint. The information marked with the “\*” symbol must be provided in order to enable Us to fulfil the processing purposes.

- To process Your employment applications You submit Us spontaneously or in answer to Our employment offers, We may collect and process Personal Data such as identification data (contact details), personal characteristics, education and training, profession and job, national identification number, a copy of the criminal records, a copy of the debt collection register.
2. We may use on the basis of Your explicit consent, Personal Data collected indirectly from You through the Website’s cookies. For more information on cookies please see below.
  3. We may use the following categories of Personal Data 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:
    - To offer and provide Our products and services, We may collect and process Personal Data such as identification data (first name, last name, telephone number, email address, address, country of residence, tax identification number), personal characteristics (sex, birth date, gender, marital status, nationality), height and weight, education and training, profession and job (place of work, employer, occupation), household composition (number of children, partner, family situation), hobbies and interests (sport practiced), life habits (consumption of alcohol, tobacco, pills), financial data (bank account, salary, pay slips, solvency of the company and salary of the final beneficiary, amount to be paid, origin of wealth), national identification number, free content (free text field).
    - For the general administrative and technical management of Our contracts of all types (including invoicing and accounting, daily communication via email, postal mail or telephone, management of requests, management of complaints and litigation, internal controls, discussions), We may collect and process Personal Data such as identification data (first name, last name, telephone number, email address, address, country of residence, policy number, signature), personal characteristics (sex, birth date, marital status, nationality), household composition (number of children), education and training, profession and job, financial data (bank account, amount to be paid, investments products, premium paid, salary and assets, properties evidence of valid acquisition, origin of funds), national identification number, content of letters, free content (free text field), convictions and sentences, investigations or lawsuits.
    - In case We send You promotional emails or electronically invite You to events in relation to Our products, We may collect and process Personal Data such as identification data (first name, last name, email address, country of residence), personal characteristics, profession and job (company name, employer), date, hour of arrival and departure. You may opt-out from receiving such communications at any time by using the opt-out procedure provided in any promotional message You receive from Us.

Please send an email to Our data protection officer if You do not want Us to send promotional emails. In such case, please use the contact details mentioned below and mention “soft opt-in emails opt-out” in the subject of Your email.

Please send an email to Our data protection officer if You do not want Us to send invitations to promotional events by electronic means. In such case, please use the contact details mentioned below and mention “soft opt-in electronic invitations opt-out” in the subject of Your email.

Please note that opting out from receiving such promotional messages from Us will not exclude You from receiving information that relates to any contract You have entered into with Us or to any other request in relation to a commercial relationship with Us.

4. We may use the following categories of Personal Data for compliance with a legal obligation to which We are subject and/or within the framework of the performance of a task carried out in the public interest:

- For AML and KYC checks, We may collect and process Personal Data such as identification data (first name, last name, email address, telephone number, address, country of residence), personal characteristics (date and place of birth, nationality), profession and job (profession), affiliations, household composition, financial data (salaries and assets, origin of wealth, inheritance, evidence of funds, properties evidence of valid acquisition), national identification number, passport number, suspicions and indictments, investigations or lawsuits, judicial measures, convictions and sentences.
  - For other legal obligations (including FACTA and CRS reporting, Private Equity reporting, tax reporting to authorities of some countries, annual certificate communication to the insured person, audits, court related injunctions), We may collect and process Personal Data such as identification data (first name and last name, address and country of residence, policy number, tax identification number), electronic identification data, personal characteristics (place and date of birth), financial data (amount collected by the client during the year, portfolio), free content (free text field), geolocation, suspicions and indictments, investigations or lawsuits, judicial measures.
5. We may use the following categories of Personal Data for the purposes of the legitimate interests pursued by Us or by a third party:
- To allow You to benefit from Our insurances to which a third party has subscribed for You and/or designated You as beneficiary, We may collect and process Personal Data such as identification data (first name, last name, telephone number, email address, address, country of residence, tax identification number, policy number, signature), personal characteristics (sex, birth date, gender, marital status, nationality), height and weight, education and training, profession and job (place of work, employer, occupation), household composition (number of children, partner, family situation), hobbies and interests (sport practiced), life habits (consumption of alcohol, tobacco, pills), financial data (bank account, salary, pay slips, solvency of the company and salary of the final beneficiary, amount to be paid, investment products, premium paid, assets, properties evidence of valid acquisition, origin of funds, origin of wealth), national identification number, free content (free text field), content of letters, convictions and sentences, investigations or lawsuits.
  - For relationship management and networking purposes, We may collect and process Personal Data such as identification data (first name, last name, address, telephone number), personal characteristics (age, nationality, gender), profession and job (place of work), household composition (number of children), financial data (insurance products), free content (free text field), national identification number.
  - For proper performing and for the security of Our IT components (including with the use of IT monitoring, debugging and testing of software), We may collect and process Personal Data such as identification data, electronic identification data, personal characteristics (age, sex, marital status), education and training, profession and job, financial data, electronic communication data, geolocation.
  - To ensure the security of Our premises and visitors under Our responsibility (with the help of access control and/or surveillance cameras), We may collect and process Personal Data such as identification data (first name and last name), profession and job (name of the employer), number of the access badge, ID card and driving license, geolocation (doors opening and date/time of opening), image recording.
  - In case We launch paper-based marketing campaigns, mailings or newsletters, We may collect and process Personal Data such as identification data, personal characteristics, profession and job (company name, employer).
  - For the purpose of sending year-end gifts, We may collect and process Personal Data such as identification data (first name, last name, address), types of gift.
  - To be able to address requests from non-contracting parties (including the right to a defence in court), We may collect and process Personal Data such as identification data, personal characteristics, household composition, financial data, investigations or lawsuits.

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 under point 5 hereinabove since such Personal Data are either processed to serve Your direct or indirect interests or are secured in such a way (via anonymization, pseudonymization or encryption) that no detrimental impact on You can reasonably be expected from such processing.

Pursuant to Article 10 of the GDPR, We will only use Personal Data relating to criminal convictions and offences for all the above described purposes when We are authorized to conduct such processing under EU legislation or applicable Member State law.

We may combine the Personal Data You submit with other data We have obtained about You for the same purposes from other sources, including if You have provided Your information to Us in other places or through another medium.

We may not use Your Personal Data for new purposes which are as yet unforeseen in this Privacy Notice except on the basis of an applicable statutory permission or Your valid consent. In any event, prior to using Personal Data for other purposes, We will inform You about such change to this Privacy Notice and in case of consent-based activities, We will offer You the chance to decline participation in these changes.

## *Special category of Personal Data*

The special categories of Personal Data concern information relating to racial or ethnical origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, health, sex life or sexual orientation.

Pursuant to Article 9 of the GDPR, We will not collect or process any special category of Personal Data relating to You unless You have given Us Your explicit consent. Such special categories of Personal Data will exclusively be used to the extent necessary for allowing Us to ensure the proper performance of Our services (including medical underwriting, risk management evaluation, reinsurance, disability claims, premium calculation and insurance policy pay-out purposes) and may include Personal Data such as information on food restrictions, health issues and the eventual invalidity level.

## *Direct marketing*

We will not use Your Personal Data for direct marketing purposes without Your explicit prior consent.

If at any time You decide not to receive any commercial or promotional information from Us, You may, free of charge and without having to provide any justification, opt-out of any direct marketing campaigns and oppose to the future processing of Your Personal Data for such purposes by sending an email to the attention of Our data protection officer. In such case, please use the contact details mentioned below and mention “direct marketing opt-out” in the subject of Your email. Alternatively, You may use the opt-out procedure provided in any promotional message You receive from Us.

Please note that opting out from receiving promotional messages from Us will not exclude You from receiving information that relates to any contract You may have entered into with Us or to any other request in relation to a commercial relationship with Us.

## *Automated decision-making*

We will not make use of automated decision-making processes, including profiling, unless such decision is either necessary for entering into or performance of a contract between You and Us, or authorised by EU legislation or applicable Member State law, or based on Your explicit consent. In such case We would inform You about the logic involved in the decision as well as the significance and the envisaged consequences of such processing for You.

## *Sharing Personal Data and transferring Personal Data to third countries*

Certain of the Personal Data collected and processed by Us may be shared with the following categories of third parties that may be acting either as data controller or data processor: Our external IT services provider, public authorities, affiliated companies and other business partners. We also recommend you to read the privacy notice of our entity Swiss Life A.G. based in Switzerland (<https://www.swisslife.ch/de/footer/footer/privacy.html>).

We will not make Your Personal Data available to any third party and shall not publicly disclose the Personal Data unless such transfers are based on Your specific consent, necessary for the performance of a contract between You and Us, or when such transfer of Personal Data is otherwise authorised or compulsory by law or by order of an administration or judicial authority.

Please note that whenever Your Personal Data are transferred to processors or third parties located outside the European Economic Area in countries which are not considered by the European Commission to guarantee an adequate level of personal data protection, We will ensure that appropriate measures are implemented according to the applicable national and European legislation relating to data protection. You may obtain a copy of the appropriate safeguards taken or information as to where they have been made available by sending an email to Our data protection officer at the email address mentioned below.

## *Use of cookies*

Cookies are small text files that are placed on Your computer or other device by websites that You visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the websites.

### **General information about the cookies used**

When You visit Our Website for the first time, the entry page will show information on privacy and respective wording regarding the consent to the use of cookies through a “cookie banner”. If You continue to actively use the Website and do not actively object to the use of cookies, You agree to Our use of Google Analytics related cookies and such consent will be stored in Your browser so that the information does not have to be repeated on every page of the Website. Should the consent be missing in Your browser (e.g. if you deleted Your cookies), the “cookie banner” with privacy information will appear again the next time You visit the Website.

We may also install and use certain technically required cookies or session cookies to improve Your user experience which therefore do not require Your prior consent.

### **Additional information about specific cookies**

This Website uses *Google Analytics*, which is a web data analysis tool of Google Inc. (Google). Google Analytics uses cookies to help Us analyse how users use the Website.

The information generated by the cookie about the usage of the Website by the user, including the user’s IP-address, will be transferred to a server in the US for storage reasons. You hereby acknowledge and to the extent necessary consent to the transfer of such data to the US.

### **How to prevent cookies to be set**

You may prevent cookies to be set by adjusting Your browser accordingly. Indeed, most web browsers allow some control of most cookies through the browser settings. To find out more about how to prevent cookies to be set, visit <http://www.allaboutcookies.org>.

However, in such case, certain features of the Website may not work properly and some functionalities of the Website might no longer be available to You.

## How to delete/deactivate cookies

In order to delete/deactivate all cookies set on Your computer, the majority of web browsers allow You to disable completely the use of cookies, or to delete cookies created by specific domains/websites. To find out how to do it, please refer to Your browser's help page:

- *Chrome:* <https://support.google.com/chrome/answer/95647?hl=en>
- *Internet Explorer:* <http://windows.microsoft.com/en-US/internet-explorer/delete-manage-cookies#ie=ie-11-win-7>
- *Firefox:* <http://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- *Safari:* [https://support.apple.com/kb/PH21411?viewlocale=en\\_US&locale=en\\_US](https://support.apple.com/kb/PH21411?viewlocale=en_US&locale=en_US)
- *Safari on IOS:* <https://support.apple.com/en-us/HT201265>
- *Opera:* <http://www.opera.com/help/tutorials/security/cookies>.

You can specifically prevent Google's collection and use of data (cookies and IP address) for any website You visit by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

An opt-out cookie (`<a href="javascript:gaOptout()"> Disable Google Analytics </a>`) that prevents the future collection of Your data when You visit the Website (<https://tools.google.com/dlpage/gaoptout/eula.html>) will be automatically installed on Your computer.

## Share on social networks

We make use of a social plug-in to enable You to share Website's information on Twitter, LinkedIn, Google+ and YouTube through "Share" buttons.

For data privacy reasons, we deliberately opted against utilizing direct social network plug-ins on Our Website. Instead, We employ an alternative technical solution that allows You to decide whether to transmit data to the social network operators and when. Thus when You visit the Website, data are never automatically transmitted to a social network. Only when You actively click on the respective button Yourself, Your web browser will connect to the servers of the social network. This means that clicking on elements then clicking on the social network's icon indicates Your consent to Your browser connecting to the servers of the social network and sending usage data to that social network operator, whether or not You are a subscriber of such social network.

We have no influence over the nature or scope of data that social networks may then gather. For information regarding the purpose and scope of data collection, further processing and use of data by social networks and regarding Your data privacy rights and relevant configuration settings, see the social networks' respective data privacy advisories.

## Links to third parties websites

On certain areas of this Website, We may provide links to third parties websites. These links are provided as a convenience to You; however please be aware that We do not control the third parties or their websites and that those third parties will have a different privacy notice applying to information collected from You when You are on those third parties' websites. You should read the privacy notices of all websites carefully before providing personally identifiable information.

## Storage duration

We will retain Your Personal Data only as long as necessary for the fulfilment of the purposes described above or as required by applicable data retention laws and statutory limitation periods for claims.

## *Security and confidentiality*

We have implemented technical and organisational measures in accordance with standard industry practices to ensure an appropriate level of security of the Personal Data processed. Nevertheless, security requires efforts from all actors involved. We thus encourage You to contribute to these efforts by taking appropriate security measures Yourself, including using strong passwords and keeping all user names and passwords (if any) confidential.

## *Children on the Website*

This Website is not intended for or directed to children under 16. We do not knowingly collect any information from such individuals. Parents, if You believe Your child has provided Us with Personal Data, please contact Our data protection officer by using the contact details mentioned below.

## *Your rights*

At any time, You may exercise Your right to request access to, or rectification of, and as the case may be, erasure of any Personal Data relating to You or to object to processing, or restriction of processing, as well as Your right to data portability in compliance with applicable data protection law by sending a signed request form with a copy of Your ID card or other proof of identity to the attention of the concerned data controller by email or in writing by using the following addresses:

- Swiss Life Luxembourg S.A.:  
dpo.sli[at]swisslife[dot]com; Swiss Life Luxembourg S.A., 2-6 rue Eugène Ruppert, L-2453 Luxembourg, Grand-Duchy of Luxembourg.
- Swiss Life Liechtenstein A.G.:  
dataprotection.liechtenstein[at]swisslife[dot]com; Swiss Life Liechtenstein A.G., In der Specki 3, 9494 Schaan, Principality of Liechtenstein.
- Swiss Life Singapore Pte. Ltd.:  
dpo.sli[at]swisslife[dot]com; Swiss Life Singapore Pte. Ltd., 250 North Bridge Road, #37-04, Raffles City Tower, Singapore 179101, Republic of Singapore.

When applicable, You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent made prior to such withdrawal.

As a data subject, You have a right to lodge a complaint with a supervisory authority (in particular in the Member State of the European Union of Your usual place of residence, Your place of work or the place where the violation occurred) if You consider that the processing of Personal Data relating to You infringes the applicable legislation relating to data protection.

## *Data protection officer*

Each of Us has designated a data protection officer whose contact details are the following:

- Swiss Life Luxembourg S.A.:  
Head of Compliance Swiss Life International; dpo.sli[at]swisslife[dot]com; (+352) 4239591; 2-6 rue Eugène Ruppert, L-2453 Luxembourg, Grand-Duchy of Luxembourg.
- Swiss Life Liechtenstein A.G.:  
Head of Legal Swiss Life Liechtenstein; dataprotection.liechtenstein[at]swisslife[dot]com; (+423) 3777000; In der Specki 3, 9494 Schaan, Principality of Liechtenstein.

- Swiss Life Singapore Pte. Ltd.:  
Head of Compliance Swiss Life Singapore; dpo.sli[at]swisslife[dot]com; (+65) 65806680; 250 North Bridge Road,  
#37-04, Raffles City Tower, Singapore 179101, Republic of Singapore.

You may contact Our data protection officers with regard to all issues related to processing of Your Personal Data and to the exercise of Your rights under the applicable national and European legislation relating to data protection.

### *Representative in the European Union*

Pursuant to Article 27(1) of the GDPR, Swiss Life Singapore Pte. Ltd. has designated Swiss Life Luxembourg S.A. as its representative in the European Union whose contact details are the following: Swiss Life Luxembourg S.A.; dpo.sli[at]swisslife[dot]com; (+352) 4239591; 2-6 rue Eugene Ruppert, L-2453 Luxembourg, Grand-Duchy of Luxembourg.

### *Effective date and changes*

This Privacy Notice was created on and has been in effect since the 24<sup>th</sup> of May 2018.

We reserve the right, at Our complete discretion, to change, modify, add, or remove portions of this Privacy Notice at any time. You should check back periodically at this page to read the most recent version of this Privacy Notice as Your continued use of this Website following the posting of changes to these terms will mean You acknowledge these changes.

Thank you for visiting this Website.