

Privacy notice

Swiss Life (Singapore) Pte. Ltd.

Swiss Life (Singapore) Pte. Ltd. (Swiss Life) aims to be completely transparent with how we collect, use, disclose or otherwise process personal information that we gather about our Customers. This Privacy Notice describes how and why we will collect, use, disclose or process your Personal Data during and after your relationship with us in accordance with the Personal Data Protection Act (“PDPA”), and other legal provisions applicable in this respect, if any.

It is important that you read this notice, together with any other Privacy Notice we may provide on specific occasions when we are collecting, using, disclosing or processing Personal Data about you, so that you are aware of how and why we are using such information.

If you are resident in the European Union, Swiss Life (Singapore) Pte. Ltd. has designated Swiss Life (Luxembourg) S.A. as its representative in the European Union, pursuant to Article 27 (1) of the EU regulation 2016/679 General Data Protection Regulation (“GDPR”). Please refer to the following link to the Privacy Notice of Swiss Life (Luxembourg) S.A. for reference: <https://www.swisslife-global.com/global-solutions/footer/privacy.html>.

Personal Data

1. As used in this Privacy Notice:

“Customer” means an individual who (a) has contacted us through any means to find out more about services we provide, or (b) may, or has, entered into a contract with us for services by us; and

“Personal Data” means data, whether true or not, about a Customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

2. Other terms used in this Privacy Notice shall have the meanings given to them in the PDPA (where the context so permits).

Organisation (Data Controller)

Swiss Life is the Organization that is responsible for deciding how we collect, use, disclose and process personal information about you.

Information collected

Depending on the nature of your interaction with us, some examples of Personal Data which we may collect from you include :

- (a) Identification data (first name, last name, telephone number, image, email address, address, country of residence, ID, geolocation, IP address, tax identification number etc.,)
- (b) Personal characteristics (birth date, gender, marital status, nationality), education and training, profession, and job (place of work, employer, occupation).
- (c) 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.
- (d) Information regarding investigations or lawsuits, judicial measures, convictions, and sentences.
- (e) Special categories of data such as health data and criminal records in some cases.
- (f) Other information regarding hobbies, interests (sport practiced) and life habits.

Purpose and Legal Basis

Swiss Life generally does not collect your Personal Data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your Personal Data to us (your “authorised representative”) after (i) you

(or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your Personal Data for those purposes, or (b) collection and use of Personal Data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional Personal Data and before using your Personal Data for a purpose which has not been notified to you (except where permitted or authorised by law).

We may collect and use your Personal Data for any or all of the following purposes:

- Where processing is necessary for offering and providing products and services and to enable the conclusion of insurance contract and to provide the best Swiss Life Customer support.
- To verify your identity
- To create an account and log-in via the relevant portal as per the following link: <https://www.swisslife-global.com> (hereinafter referred to as the “Website”).
- For the general administration, technical and daily management of our contracts (including invoicing and accounting, daily communication via email, postal mail or telephone, management of requests, management of complaints and litigation, internal controls, discussions).
- To allow contact via our contact and complaint forms.
- To comply with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority.
- For any other purposes for which you have provided the information.
- To Transmit to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes.
- For any other incidental business purposes related to or in connection with the above.
- For compliance with Anti-Money Laundering /Know Your Customer obligations.
- 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).
- To process Personal Data for the purposes of protecting our legitimate interest and fulfilling our legal obligations regarding the global monitoring of the Swiss Life Group's legal and reputational risks associated with money laundering and terrorist financing, and for this purpose we may also transmit them to Swiss Life AG, General-Guisan-Quai 40, 8002 Zurich, Switzerland and its auditing company.
- To allow for the proper execution of the contract and the payment of benefit towards designated beneficiary.
- Where processing is necessary for being able to defend our interests in defence or take legal action, to proceed to investigations in case of potential breach of contracts or violation of law or regulation which would have a negative impact on Swiss Life.
- To be able to address requests from non-contracting parties (including the right to a defence in court).
- For proper performance of our IT monitoring (including with the use of IT components, debugging and testing of software).
- To ensure the security of our premises and visitors under our responsibility with the help of access control and/or surveillance cameras.
- Your data is also processed regularly for conducting data analytics studies and surveys to review, better understand the business improving our services.

Reliance on the Legitimate Interests Exception

In compliance with the PDPA, we may collect, use or disclose your Personal Data without your consent for the legitimate interests of Swiss Life or another person. In relying on the legitimate interests exception of the PDPA, Swiss Life will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.

In line with the legitimate interests’ exception, we will collect, use or disclose your Personal Data for the following purposes:

- a) Fraud detection and prevention;
- b) Detection and prevention of misuse of services; and
- c) Network analysis to prevent fraud and financial crime, and perform credit analysis.

The purposes listed in the above clause may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter.

Sensitive / Special categories of Personal Data

We may, in limited circumstances, collect and process certain types of Personal Data that are considered sensitive under applicable data protection laws, including the GDPR. These may include data relating to health conditions, medical history, biometric or genetic data, financial circumstances (e.g. bankruptcy status), dietary restrictions, criminal convictions or offences, children’s Personal Data, and personal identifiers such as National Registration Identity Card (NRIC) numbers or passport details.

Where required by applicable law, including the GDPR, we will only collect or process such data where:

- a) you have provided your **explicit consent**,
- b) the processing is necessary for the establishment, exercise or defence of legal claims,
- c) or where another legal basis under the relevant data protection law applies.

We collect and use such data only to the extent necessary for the proper performance of our services as described above.

We implement appropriate technical and organisational measures to safeguard such data in accordance with applicable legal requirements.

Protection of Personal Data

To safeguard your Personal Data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as minimised collection of Personal Data, authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), encryption of data, up-to-date antivirus protection, regular patching of operating system and other software, and security review and testing performed regularly.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

Accuracy of Personal Data

We generally rely on Personal Data provided by you (or your authorised representative). In order to ensure that your Personal Data is current, complete and accurate, please update us if there are changes to your Personal Data by informing our Data Protection Officer in writing or via email at the contact details provided below.

Sharing Personal Data and transferring Personal Data to third countries

We may share Personal Data with the following categories of third parties: our group parent company and its internal monitoring bodies and audit company, our external IT service providers (including cloud service providers and data centers), public authorities, affiliated companies, intermediaries, and other business partners. These recipients of Personal Data may act as the Organisation (Data Controllers) or as data intermediaries, and must comply with applicable legal and/or contractual obligations regarding the protection of Personal Data, including applicable processor contractual clauses, confidentiality obligations, and other required safeguards.

Where Personal Data is shared with IT service providers or data centers located within Singapore, we may do so without providing separate notice to you, provided that such sharing is necessary for the performance of our services, internal operations, or the fulfilment of our contractual or legal obligations, and is subject to appropriate contractual safeguards.

Where Personal Data is transferred to recipients located outside Singapore, including cloud service providers, we will ensure that appropriate measures are implemented to protect your Personal Data in accordance with applicable laws. These measures may include, where required, the use of applicable processor contractual clauses, confidentiality obligations, and technical and organizational safeguards, taking into account the laws of the country of the recipient.

We will not make Personal Data available to any third party or publicly disclose it unless the sharing is necessary for the purposes described above, is required or authorized by law, or you have otherwise provided your consent.

Other Recipients of data

We may share some Personal Data of customers with other members of our Group for internal communications, administrative purposes, and other purposes of group management.

We may also share Personal Data with external IT service providers (including cloud service providers and data centers) and other recipients if required to meet our contractual or legal obligations, operate our services, or support our business operations. Where such recipients are located within Singapore, we may share this data without providing separate notice to you, provided that the sharing is subject to appropriate contractual safeguards. Where recipients are located outside Singapore, we will ensure that appropriate measures are in place to protect your Personal Data in accordance with applicable laws.

These other recipients can include official authorities, public administrations, intermediaries, and other insurance and reinsurance companies, where applicable.

Retention period

We may retain your Personal Data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

We will cease to retain your Personal Data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the Personal Data was collected, and is no longer necessary for legal or business purposes.

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your Personal Data for a specific purpose, once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to.

Your rights

(a) Withdrawing your Consent

The consent that you provide for the collection, use and disclosure of your Personal Data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your Personal Data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described above.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose Personal Data where such collection, use and disclose without consent is permitted or required under applicable laws.

For the avoidance of doubt, you have the right to lodge a complaint with a supervisory authority if you consider that the processing of Personal Data relating to you infringes the applicable legislation relating to data protection.

(b) Access to and Correction of Personal Data

If you wish to make (a) an access request for access to a copy of the Personal Data which we hold about you or information about the ways in which we use or disclose your Personal Data, or (b) a correction request to correct or update any of your Personal Data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

Information Security

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality. Third parties will only process your Personal Data on our instructions and where they have agreed to treat the information confidentially and to keep it secure. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Protection Officer

You may contact our Data Protection Officer if you have any enquiries or feedback on our Personal Data protection policies and procedures, or if you wish to make any request, in the following manner:

DPO : Tajinder Kaur

Email: dpo.sin@swisslife.com

Post: 250 North Bridge Road #37-04 Raffles City Tower Singapore 179101

Effective date and changes

This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your Personal Data by us.

We reserve the right, at our complete discretion, to change, modify, add, or remove portions of this Privacy Notice at any time. You may determine if any such revision has taken place by referring to the date on which this Privacy Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date	:	01/08/2025
Last updated	:	01/08/2025