



CNP Europe Life DAC Privacy Notice

1. THE CONTROLLER OF YOUR PERSONAL DATA.

As data controller we, CNP Europe Life DAC, are committed to protecting your Personal Data by processing it in line with GDPR and national law. This notice explains why we collect Personal Data, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We keep this notice under review. This notice was last updated in March 2026. We may change this notice from time to time. The latest version will always be displayed on our website at: www.cnplife.ie.

2. CONTACT DETAILS OF THE CONTROLLER

Any questions regarding this notice and our privacy practices should be sent by email to indexinfo@cnplife.ie or in writing to CNP Europe Life DAC, Three Park Place, Hatch Street Upper, Dublin, Ireland.

3. CATEGORIES OF PERSONAL DATA WE COLLECT & PROCESS.

We may collect and Process some or all the following categories of Personal Data in relation to you, but solely when it is necessary for the Purposes set out in Paragraph 6, and where there is an associated Legal Basis for the Processing.

INDIVIDUAL DETAILS - Name, address (including proof of address), other contact details (e.g., email and telephone numbers), nationality, details of dependants, details about marital status, bank account details, salary, HRMC data, tax details.

IDENTIFICATION DETAILS - ID numbers issued by government bodies or agencies, including your NI or similar number, passport number, driver's licence, work permit details.

EMPLOYMENT INFORMATION - Job description & Salary.

GENERAL RECORDS - General correspondence, telephone, and conference (audio & video) records; emails and use of our websites, data relating to criminal convictions if any.

SPECIAL CATEGORIES OF PERSONAL DATA - Data concerning health¹.

DATA FROM OTHER SOURCES - We may also collect Data from other sources including Publicly available Data (e.g., social media and online content you have made publicly available). - TV, radio, and media content - EU and UN Sanctions lists.

PERSONAL DATA OF THIRD PARTIES PROVIDED BY YOU - We accept Personal Data of Third Parties provided by you solely on the basis outlined in Paragraph 12.

4. SOURCES FROM WHERE WE OBTAIN YOUR PERSONAL DATA.

In most cases we initially obtain your Personal Data from you. Subsequently we may obtain more Personal Data from you when you contact us or our administrator directly.

We may obtain your Personal Data from other people or entities, for instance when you give us permission to obtain a report from your doctor, lawyer, or accountant. Lastly, we may obtain information about you which is publicly available.

¹ These are categories of Personal Data which have extra protection under Data Protection law. The categories are health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, bio-metric, or data concerning sex life or sexual orientation. This includes Data which is not Special Category Data but may imply or suggest your religion, health, or other special category information such as sexual orientation.



5. THE LEGAL BASES FOR PROCESSING YOUR PERSONAL DATA.

Following EU and national data protection laws we may process your Personal Data for the legal bases listed below:

- a. You have given your consent (either directly to us – or to a party who has transferred your Personal Data to us).
- b. To perform an insurance contract.
- c. To follow legal obligations imposed on us.
- d. To protect your vital interests, or those of someone else.
- e. Where we conduct a task in the public interest.
- f. Where it is necessary for the purpose of our legitimate interests (except where your rights and freedoms would be affected negatively).

6. THE PURPOSES OF PROCESSING YOUR PERSONAL DATA.

We may process your Personal Data for the following purposes:

(In each case we have highlighted the legal basis from the list in Paragraph 5 in brackets).

1. *Administration of your insurance contract **(b, a)**.*
2. *Fulfilment of our, and Group fiduciary requirements related to managing our accounts (c) & counteracting money laundering and terrorist financing. **(e)**.*
3. *Fulfilment of our legal obligations related to tax reporting by the data controller. **(c)**.*
4. *Prevention of financial crimes against us, our customers, and our employees **(f)**. – (Our legitimate interest in protecting ourselves, our customers, and our employees from financial loss because of fraud & other financial crimes), and the prosecution of such crimes. **(e)**.*
5. *Reinsurance **(f)**. – (Our legitimate interest in reducing the insurance risk associated with the contract).*

7. STORING YOUR PERSONAL DATA.

We will only store your Personal Data while we need it for the purpose for which we collected it, plus any legal requirement imposed on us to keep it for a longer period.

8. SHARING OF YOUR PERSONAL DATA.

We may share your Personal Data with group companies, parent companies, insurance and reinsurance companies, administrative & professional service providers, research agencies, IT and /or other service providers, official law enforcement authorities, persons. We may share your Personal Data with entities where you have consented to us sharing your data.

9. YOUR DATA RIGHTS.

Here is a list of the rights you have concerning your Personal Data. We have highlighted in brackets any associated legal bases from the list at paragraph 3.

1. *You have the right to access your data and the right to request its rectification, deletion, or restriction of its processing.*
2. *If the legal basis for the processing of your Personal Data is **(f)**, you have the right to object.*
3. *You have the right to object to the processing of your data for the purposes of direct marketing and profiling.*
4. *If the legal basis for the processing of your Personal Data is **(a)**, you have the right to withdraw your consent. This does not affect the lawfulness of processing before your withdrawal of consent.*
5. *You have the right to object if we process your Personal Data in an automated manner, and request that we have a person review it.*
6. *Where the legal basis for processing your Personal Data is **(a)** or **(b)**, you have the right to ask that we send it to another data controller.*



7. *You have the right to lodge a complaint with the supervisory body dealing with the protection of Personal Data.*

If you want to exercise any of these rights please contact us, using one of the contact channels set out in Paragraph 2.

10. TRANSFERS OF YOUR PERSONAL DATA TO OTHER COUNTRIES.

We store and process your Personal Data primarily in the EEA, and in jurisdictions with equivalent data protection rules to the EU. If we transfer your Personal Data to a country that does not have the level of Personal Data protection considered adequate by the EU, we will put in place all the other measures required by law that guarantee the required level of protection of your data.

11. WHEN IS IT NECESSARY TO GIVE US YOUR PERSONAL DATA?

Giving us certain Personal Data is necessary for us to administer the insurance policy.

12. PERSONAL DATA OF THIRD PARTIES.

It may be necessary for you to provide us with the Personal Data of other people (for instance your family members). Before you do so, you must:

- Tell them how we process their data, by providing them with a copy of this notice.
- Ensure that they agree.

Our acceptance of other people's Personal Data provided by you is on the strict understanding that you have done this.

13. UPDATING PERSONAL DATA.

It is important that the Personal Data we hold is correct. Please tell us if there are any changes to it. For example, if you change your address, phone number, or email address, it is important that you let us know as soon as possible.