



## CNP Europe Life DAC Privacy Notice

As data controller, CNP Europe Life DAC is committed to protecting and respecting your privacy. 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 May 2024. We may change this notice from time to time. The latest version will always be displayed on our website at: [www.cnplife.ie](http://www.cnplife.ie).

### Contact Details of the Controller

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

### How do we collect Personal Data from you?

You provide us with your personal information when you contact us and when you complete our forms or when we contact you. We also get personal information from your representatives, financial advisers, solicitors or regulators.

### What type of Personal Data is collected from you?

The information we may collect from you can include:

- Personal details such as name (including former names), date of birth, gender,
- Pension details and history,
- Absence details and history,
- Employment details and history,
- Contact details (e.g., home address, telephone numbers and e-mail address),
- Online identifier e.g., IP address,
- Copies of identification and similar documents e.g., copies of passport,
- Health or sex life details,
- Financial details such as salary, bank details, account numbers, National Insurance (NI) details, HRMC data
- Death certificates, wills and/or probate documents,
- Details about marital status including copies of marriage certificates,
- Details about your spouse/dependants (e.g., name, address, copies of birth certificates, copies of passport).

### Why do we collect and process (use) your Personal Data?

We collect and process Personal Data to provide services to our customers and run our business.

### Legal Bases for processing Personal Data

To process Personal Data, we must have a legal basis to do so. The following are all bases on which Personal Data may be processed legally: -

1. The Data Subject has given Consent to the Processing of his or her Personal Data for one or more specific purposes.

2. Necessary for the performance of a contract to which the Data Subject is party or to take steps at the request of the Data Subject prior to entering a contract.
3. Necessary for compliance with a legal obligation to which the Controller is subject.
4. Necessary to protect the vital interests of the Data Subject or of another natural person.
5. Necessary for the performance of a task conducted in the public interest or in the exercise of official authority vested in the Controller.
6. Necessary for the purposes of the Legitimate Interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject.

## How is your Personal Data used?

(In each case we provide the legal bases in brackets)

Your information is used to: -

- Provide and manage pensions for our customers.
- Transfer funds and make payments to customers & their dependents, and to other authorised parties.
- Perform accounting and other record-keeping functions.
- Fulfil our legal obligations related to counteracting money laundering and terrorist financing.
- Fulfil our legal obligations related to tax reporting.
- Help detect and prevent fraud against the company, customers, & employees.
- Keep Personal Data secure.
- (Where legally obligated to do so), assist official authorities to detect and prevent crime and prosecute offenders.
- Reinsurance (Our legitimate interest in reducing the insurance risk associated with the contract).

## For how long do we retain your Personal Data?

We hold your Personal Data only for as long as is necessary to achieve the purpose for which it was obtained, plus (depending on the Data) any additional period we are legally obliged to hold it for. If you have a query relating to the specific retention period, please contact our Data Protection Officer using the [Contact Details](#) above.

## Who has access to your Personal Data?

We may pass your Personal Data to vetted third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. We only disclose Personal Data necessary.

If your Personal Data is transferred to a country that does not have the level of Personal Data protection considered adequate, we will put in place additional measures that guarantee the required level of data protection.

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## What are your rights?

(Any associated legal bases from the list at paragraph 3 above are written in brackets).

- You have the right to access your data and the right to request its rectification, deletion, or restriction of its processing.
- If the legal basis for the processing of your Personal Data is (6), you have the right to object.
- You have the right to object to the processing of your data for the purposes of direct marketing and profiling.
- If the legal basis for the processing of your Personal Data is (1), you have the right to withdraw your consent. This does not affect the lawfulness of processing before your withdrawal of consent.
- You have the right to object if your data is processed in an automated manner, and request that it be reviewed by a person.
- Where the legal basis for processing your Personal Data is (1) or (2), you have the right to request that we transmit it to another data controller.
- 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 the [Contact Details](#) above.

## How can I access and update my Personal Data?

If you want to access your Personal Data, or if you have any other questions or concerns about it, please contact us using the [Contact Details](#) above.

## How can I update my Personal Data?

It is important that the Personal Data we hold is correct. Please inform us of any changes to it. In particular should you change your address, phone number, or email address, it is important that you let us know as soon as possible.