

OneLife Privacy Policy – Clients

1. Data Collected

Personal data are defined per reference to the Regulation 2016/679/EU 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 any other law or regulation applicable in Luxembourg (hereafter the "Laws and Regulation on Personal Data") as any information relating to an identified or identifiable natural person.

This includes any data through which a natural person can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

In the framework of the Policy, this concerns the Policyholder, the Life Assured, the Beneficiary or any other natural person from which personal data are collected and processed (hereafter individually referred to as the "Data Subject" and together as the "Data Subjects"). Personal Data collected includes notably, but without limitation, the Data Subject's names, place and date of birth, address, TIN, occupation, wealth, etc. It also comprises sensitive data about the Data Subjects including data as to physical or mental health, which are hereafter referred to as the "Sensitive Data". All of those are hereafter globally referred to as the "Personal Data".

The Personal Data collected, registered and processed includes:

- Identification Personal Data, such as, but not limited to names and surnames;
- Identification Personal Data issued by public authorities such as social security number, ID or passport;
- Electronic Identification Personal Data such as email addresses;
- Electronic location Personal Data such as mobile phone number;
- Professional Personal Data, such as activity and occupation;
- Particular financial Personal Data such as Tax Identification Number and Annual Income;
- Personal characteristics Personal Data such as age and gender;
- Household composition Personal Data such as marital status;
- Studies and Education Personal Data such as professional qualifications.

The Personal Data collected, registered and processed can include, especially in case of a potential death cover:

- Physical Personal Data such as weight;
- Personal Data relating to health;
- Lifestyle Personal Data such as tobacco or alcohol consumption.

All Personal Data (including those relating to other Data Subjects than the Policyholder) processed by the Insurer are provided by the Data Subject through:

- The application of the Policyholder for subscription of the Policy;
- The Secured Websites, the public website <http://www.onelife.eu.com>, the mobile application OneLife OneApp;
- Mails or emails sent to or telephone calls received by the Insurer;
- Events, forums and other conferences organised by the Insurer, in which the Data Subject takes part;
- The Intermediary chosen by the Policyholder for the subscription or the administration of the Policy, for compliance with the legal and compliance duties obligations of the Insurer.

For the sake of a good execution of the Policy, the Personal Data collected may include Personal Data of other Data Subjects than the Policyholder and the Life Assured (for instance, but not limited to, Personal Data on the Beneficiary or assignee(s) of the Policy). The Policyholder and the Life Assured understand and acknowledge that the legitimate interest of the Insurer and of such other Data Subject is to authorise the Insurer to collect and process such Personal Data for the benefit of such other Data Subject, in which case the Insurer will collect and process the Personal Data and will take care to preserve a proportionate balance between the interest pursued and the respect of the privacy of the Data Subject

2. Nature and purposes of processing

The Policyholder understands that, in order to subscribe to the Policy, it is compulsory for the Insurer to collect several Personal Data (including Sensitive Personal Data) on the Data Subjects for the subscription and, if accepted by the Insurer, the execution and administration of the Policy but also in order to allow the Insurer to fulfil its various legal and regulatory obligations such as those related to the prevention of money laundering and/or terrorist financing. During the life of the Policy, the Insurer may also need to collect additional Personal Data from the Data Subjects to update its records for the execution of the Policy, to allow the Data Subjects to access further functionalities (such as, for example, the Insurer's Secured Website, e-Statements Service, e-Signature Service and/or the mobile application OneLife OneApp) or the Data Subjects may also submit this Personal Data directly to the Insurer.

All Personal Data shall be processed in accordance with the Laws and Regulation on Personal Data, this Personal Data Policy and the data protection notice, which is part of the Application Form, for different purposes:

The Insurer will first use the Personal Data to fulfil its **contractual obligations** towards the Data Subject or to take **pre-contractual measures** at the Data Subject's request, in particular to:

- Assess the risks;
- Implement the Data Subject investment profile and strategy;
- Process the application;
- Draw up, issue, administer and execute the Policy;
- Pay any possible partial of full surrender and any other claims with respect to the Policy.

The Insurer will also process the Personal Data in order to comply with any **legal, regulatory and administrative obligations** to which it is subject, in particular with regard to:

- Money laundering and terrorism financing prevention, detection and prosecution;
- Implementation of insurance or any other legislations;
- Fight against tax fraud;
- Tax obligations, including mandatory reporting obligations, tax declarations and payments;
- Update of its records about the Data Subject.

The Insurer will also process the Personal Data for Marketing purposes and provide the Data Subject with commercial offers, competitions, promotions, games and contests, if the Data Subject gave its **consent** to such processing.

Finally, the Insurer may process the Personal Data for its **legitimate interest**, in which case it will take care to preserve a proportionate balance between the interest pursued and respect for the privacy of the Data Subject. In this context, the Insurer may in particular process the Personal Data for the following purposes:

- Evaluating the effectiveness of the Insurer's marketing;
- Research, training and statistical analysis with the aim of improving the services;
- Making the Insurer's forms and tools, including digital tools, easier to use for the Data Subject;
- Providing the Data Subject with access to additional services;
- Responding to enquiries and information requests;
- Processing Personal Data related to the other Data Subject, freely given by the Policyholder and the Life Assured or the other Data Subjects to which it relates in the frame of the Policy.

By signing the Application Form, the Policyholder and the Life Assured expressly recognise they were informed of the collection and processing of their Personal Data, as well as the Personal Data pertaining to other Data Subjects, and acknowledge the Insurer will collect, register and process the Personal Data, for purposes described above.

3. Sensitive Data

For the purposes described above and for the good execution of the Policy, the Personal Data collected shall not contain data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, personal data relating to criminal convictions and offences or related security measures or data concerning a natural person's sex life or sexual orientation. If such data should be requested from the Data Subject, for instance for the good execution of the Policy subscribed by the Policyholder, the express consent of the concerned Data Subject for the collection, processing and archiving of such data shall be obtained by the Insurer beforehand.

Notwithstanding the above, in the frame and for the good execution of the Policy, the Personal Data collected shall or may contain genetic data, biometric data for the purpose of uniquely identifying a natural person or data concerning health, which are considered as Sensitive Data.

The Policyholder and the Life Assured expressly recognise they were duly informed of and specifically agree to the collection and processing of their Sensitive Data, and hereafter authorise the Insurer to register and process this Sensitive Data, for the execution of the Policy and the purposes described in this Privacy Policy.

The Policyholder and the Life assured are informed that such consent to collection and processing of their Sensitive Data can be withdrawn at any time by the Data Subject. Furthermore, they are also informed that, considering the nature of the Policy, should a Data Subject withdraw his consent to the collection and processing of his Sensitive Data, the Insurer might no longer be able to ensure the payment of an Additional Death Cover, where such an Additional Death Cover would be applicable to the Policy. In such a case, the Policyholder understands and accepts that a withdrawal of consent, as foreseen in this paragraph, might be considered and treated by the Insurer as an express renunciation to the Additional Death Cover.

The Insurer will ensure that the access to the Data Subject's Sensitive Data is strictly limited.

By signing the Application Form, the Policyholder and the Life Assured expressly commit to inform the other Data Subjects (such as, but not limited to, the Beneficiary) of the collection and processing of their Personal Data by the Insurer for the application of the Policy.

4. Automated decision making and profiling

The Personal Data collected may be processed partially through automated means but only when the decision is necessary to enter into or for the performance of the Policy, and notably for the performance of the legal duties of the Insurer (such as, but not limited to, anti-money laundering obligations).

No decision will be made entirely based on automated Personal Data Processing and the decision will ultimately lie with the staff/management of the insurer. The Insurer carries out regular checks to make sure its systems are working as intended.

The Personal Data collected may be processed partially for profiling purposes on top of statistical purposes, when necessary to enter into or for the performance of the Policy, and notably for the performance of the legal duties of the Insurer (such as, but not limited to, anti-money laundering obligations).

5. Duration of processing

The Personal Data collected will not be stored in the Insurer's systems for longer than needed to achieve the purposes described above, notwithstanding specific regulations on data retention applicable to Luxembourg insurance undertakings. In particular, the Insurer shall not keep the data collected beyond the end of a 10-year period after the termination of the last Policy subscribed by the Data Subject (hereafter the "Retention Period"). The Personal Data might be stored after the end of the Retention Period for a limited period of 10 years but will only be processed for statistical purposes, especially through pseudonymisation and minimisation.

These data should be limited to gender, wealth and wealth category, income, nationality, country of residence, marital status, occupation, business activity, potential political, military, judicial or administrative office, other financial commitments, investment profile and strategy.

6. Transfer of Personal Data

The Insurer reserves the right to transfer the Personal Data to its suppliers in order to comply with its obligations under the General Conditions and for the good execution and administration of the Policy:

- To other companies that are from time to time in or out of its corporate Group (or other companies acting on its instructions);
- To other companies used by the Insurer for archiving;
- To other companies used by the Insurer for keeping contact with the Data Subject (such as but not limited to postal service and telecommunication companies);
- To other companies used by the Insurer for the administration of the Policy (such as but not limited to reinsurers, aggregators and service providers);
- To other companies used by the Insurer for the financial administration of the Policy;
- To any other persons specially appointed or authorised by the Data Subject (even in third countries if specifically requested by the Data Subject) - such as notably the Intermediary;
- To those persons or authorities to whom the law or another regulation requires or authorises the Insurer to disclose such data, under the terms provided for in the aforementioned Laws and Regulations on Personal Data or any other law or regulation applicable to the Insurer, such as the tax administration or under a relevant court decision;
- To those persons located outside the European Economic Area (EEA) if the Data Subjects gives a mandate to the Insurer in this respect.

The Data Subject is entitled to request details about those transfers at any time.

The Insurer does not perform any data processing operations in a country located outside the EEA. Should the Insurer change its Policy in this respect, the Data Subject will be informed beforehand.

In compliance with the provisions of article 300 of the law of December 07th 2015 on the insurance sector applicable to insurance undertakings in Luxembourg and in compliance with the Laws and Regulations on Personal Data, the Insurer will only communicate the Personal Data to the Intermediary appointed by the Policyholder through the information mandate.

Warning: Should the Policyholder refuse the communication of all Personal Data on the Data Subjects to the Intermediary, this may strongly impede the quality of the service delivered to the Policyholder in relation to the Policy by the Insurer and the Intermediary. In such a case, the Policyholder commits to inform the Intermediary of all the Personal Data of the Data Subjects linked to the Policy and the Insurer shall bear no liability for any claim and/or damages in relation to this choice of the Policyholder.

7. Identity and contact details of the Data Controller and of the Data Protection Officer

The Data Controller is the Insurer:

The OneLife Company S.A.
38 Parc d'Activités de Capellen
BP 110, L-8303 Capellen
Luxembourg
Tel: +352 4567301

The Insurer's Data Protection Officer (hereafter the "DPO") can be contacted through the Insurer's Secured Website, by mail at the address of the Insurer or through the specific email address: dpo@onelife.eu.com.

8. Rights of the Data Subject

In compliance with the Laws and Regulations on Personal Data and any other applicable law or regulation, the Data Subject has the right to :

1. Obtain transparent information on the Personal Data collected and the processing completed on this Personal Data collected;
2. Request from the Insurer **access** to Personal Data, and a.o. to get information on the purpose of the processing, the categories of Personal Data concerned and recipients or categories of recipients to whom the Personal Data have been disclosed ;
3. Request a **rectification** of Personal Data i.e. to request that specific Personal Data be rectified from the Insurer's systems where one of the legal grounds is applicable;
4. Request a **restriction of processing**, i.e. provided one of the legal grounds is applicable, to request that Personal Data are, with the exception of storage, only processed with the Data Subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person;
5. **Object**, on grounds relating to his particular situation, to processing based on the legitimate interest of the Insurer;
6. Request a **portability**, i.e. the right to receive the Personal Data concerning him, which he has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, if technically feasible;

7. Use his right to be forgotten, i.e. to request an erasure of the Insurer's entire records of Personal Data about him, subject to the provisions of clause 5 concerning pseudonymisation and anonymization;
8. Get a notification of data breaches i.e. when Personal Data collected and processed by the Insurer is lost or is subject or unauthorised access or disclosure that is likely to result in a serious harm to the Data Subject;
9. Withdraw consent at any time if the processing of his Personal Data is based on such a consent (i.e. for instance, but not limited to the purpose of commercial offers, competitions, promotions, games and contests);
10. File a complaint with the Luxembourg supervisory authority, i.e. to send a complaint letter to the Commission Nationale pour la Protection des Données, 1, avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Grand Duchy of Luxembourg;
11. Rights related to automated decision making, including profiling, i.e. a decision of the organisation based on Personal Data and carried out without human intervention or profiling i.e. an automated processing of personal data to evaluate certain things about an individual. In cases where automated processing decisions are taken, the Data Subject has the right to obtain a human intervention on the processing leading to the decision, to express concerns and to object to the decision.

The Insurer reserves the right to refuse to answer to the request of the Data Subject in the following cases:

- Where the information provided as a support of the request does not allow the Insurer to specifically identify the Data Subject performing the request, or
- Where requests from a Data Subject are manifestly unfounded or excessive, in particular because of their repetitive character.

No fees or charge of any kind shall be required by the Insurer for the exercise of the Data Subject's rights, however the Insurer reserves the right to charge reasonable fees which take into account the administrative costs of providing the information or communication or taking the action requested, where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character.

The Data Subject may refuse to communicate his personal data to the Insurer. This would prevent the continuation of the contractual relationships with the Insurer and would imply the termination of the Policy after a notice period of thirty days. The Insurer would then pay back to the Policyholder the Surrender Value of the Policy in accordance with the provisions of the General Conditions.

ESSENTIAL WEALTH

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