

Monument Life Insurance DAC ("MLIDAC" or "MLI") Privacy Notice

Effective Date: December 2023

1 Introduction

MLI, as your data controller, (“we”, “us”, “our”) is committed to maintaining and respecting our data protection obligations.

This Privacy Notice (“Notice”) sets out important information regarding our privacy practices in respect of Personal Data* relating to our customers and their appointed representatives, members of the general public visiting our website, external job candidates, contractors, and other business partners including but not limited to, investor companies, potential business providers and targets, goods and service providers, and shareholder nominees. Please read this Notice carefully. All enquiries regarding this Notice should be directed to MonumentOps@monumentinsurance.com

*For the purposes of this Notice, Personal Data includes any information which can identify a living individual and includes sensitive data such as race, ethnicity, health, biometric, and sexual orientation.

This Notice tells you how we collect, process, and protect your personal data when you interact with us. The categories of personal data we collect and how we process such data depends on the nature of our relationship with you and the means through which we interact, including when you visit our website.

We may update this Notice from time to time. Any changes to this notice shall be posted on our website.

Any third-party websites which you may access via our website are not covered by this Notice. MLIDAC accepts no responsibility or liability for the use and protection of any personal data which you provide to such third-party websites. You should exercise caution and read the privacy notice of the relevant third party before providing any personal data.

2 Sources of Personal Data Collection

The following is a non-exhaustive list of ways in which we collect personal data:

- **Direct Collection** - We collect Personal Data that you provide to us directly e.g., when you contact us by email, post, or telephone.
- **Acquisitions and Policy Administration** - When we acquire new portfolios of business, we obtain policies and customer data. This means that we collect all the information related to the original contract. As we continue to administer these contracts, we collect new personal data when policyholders want to make a change in the contract, or submit a claim etc.
- **Third-Party Collection.** We collect Personal Data about you from third parties such as business partners. You may also contact us in relation to your data protection rights in respect of the data that has already been disclosed.
- **Automated Collection.** We also collect and may permit third parties to collect personal data about you automatically through the use of cookies and similar tracking technologies on our website. You may update your automated collection preferences by accessing the cookie preference centre

on our website. For more information, please refer to our Cookies Policy at [Cookies Policy - Monument Re Group](#)

3 Categories of Personal Data We Collect

We may collect one or more of the following categories of Personal Data about you depending on our relationship with you:

- **Personal Identification:** name, contact information (such as e-mail and postal address, telephone numbers), date of birth, job title, employing organisation, and visual images;
- **Financial Information:** bank account name and number, sort code, credit reports, shareholding rights, and other financial data appropriate to support business transactions and/or credential verifications;
- **Recruitment Information:** professional resumé including biographical information (such as employment and education history), professional reference and recruitment feedback, notes, and related performance information, right to work documentation (such as passport, driving licence, and/or visa information), Other information about yourself that you provide in a resumé or similar document;
- **Background check Information:** background verification results, including against Criminal Data, international sanctions, politically exposed persons or export controls registers, complaints or claims, investigations, and other monitoring, reporting and remediation information;
- **Detailed information about policyholders:** this includes
 - *Personal Identification data:* name, gender, year and place of birth, date of death, national identification number, contact information;
 - *Location data:* street and number, postal/zip code, and country of residence;
 - *Personal life data:* civil status, partner's identity, number of children;
 - *Financial data:* bank account details;
 - *Professional data:* date of service, social state, wage, employment history, employer, professional sector; and
 - *Special categories of Personal Data* including criminal offences and convictions data ("Criminal Data") and health-related data e.g., weight, height, illnesses, and treatments, smoking behaviour, and pregnancy;
- **Detailed information about your claims:** including Personal Data about policyholders, witnesses, related parties, experts appointed and third-party service providers; and special categories of personal data such as medical reports, disability information and Criminal Data;
- **Sensitive Data collected for purposes other than claims and policy administration:** Information regarding racial or ethnic origin, gender, religious or philosophical beliefs, sexual orientation, and/or disability, for equality of opportunity monitoring purposes and only with your explicit consent;
- **Monitoring Information:** video surveillance including closed-circuit television footage when entering our premises and technical information collected through the use of cookies, web beacons, and/or similar tracking technologies that we place and may permit third parties to place on our website(s), including online identifiers such as IP addresses and unique device identification, and online activity

information, such as direct and social media interaction with our website; and

- **Contract Information:** contracts (to be) entered into between us and other individuals or third parties, information regarding existing contracts between the individual and third parties.

4 How We Use Your Personal Data Lawfully

We do not process your Personal Data for purposes incompatible to those notified to you through this Notice. We may use your Personal Data for different business purposes and rely upon different legal bases, subject to applicable data protection laws and regulations such as:

- **With your consent**, for all such purposes for which you provide consent. Where we process sensitive data about you, we additionally rely on your explicit consent obtained through the 'Sources of Personal Data Collection' mentioned in Section 2 above. You have the right to withdraw your consent at any time.
- **To perform our contractual obligations towards you** including the management and delivery of the insurance contract. This is also to undertake pre-contractual steps at your request, such as to respond to vacancy applications we receive from you for recruitment purposes.
- **To fulfil a legal obligation** to which we are subject, e.g., Know Your Customer checks.
- **To pursue our legitimate interests**, where it is not overridden by your own legitimate interests and/or fundamental rights and freedoms, including:
 - Managing our interactions and business relationship with you, including by responding to requests which you have submitted;
 - Preventing or detecting fraud, misrepresentation, security incidents or crime;
 - Protecting the safety, property and rights of all individuals who interact with us, including through ensuring the health and safety of all individuals who are present at our business premises;
 - Bringing or defending legal claims.
 - Investigating any complaints received from you or from others, about our services;
 - Obtaining legal advice, support, or representation in connection with legal claims, compliance, regulatory and investigative purposes, as necessary as permitted by applicable laws and regulations;
 - Notifying you about changes to our services, where applicable;
 - Keeping our website safe and secure, to run our business, provide administration and IT services, network security.
- For such purposes that may be required or permitted by applicable data protection laws and regulations

Wherever there is a business requirement to process your Personal Data for purposes that are incompatible with those described above, we will notify you of the same by updating this Privacy Notice. We do not currently sell or intend to sell your personal data. For further information regarding your privacy rights please refer to [Section 9 below](#).

Please note that in certain circumstances such as when you have entered or are proposing to enter into a contract with us (e.g., to provide us/you with products and/or services), the provision of personal data is a requirement of the contract you entered/are proposing to enter into with us. The provision of personal data in these circumstances is necessary to enable us to perform pre-contractual steps at your request, to enter into the contract with you, and/or to perform our legal obligations under our contract with you.

5 How We Share Your Personal Data

We may share your personal data with the categories of recipients described below:

- **Monument subsidiaries and affiliates.** We may share your personal data within our group of companies, which includes parents, corporate affiliates, subsidiaries, business units and other companies that share common ownership for the purposes, and using the legal basis, set out in this Notice.
- **Third-Party goods and services providers, partners, and other companies.** We may share your personal data with third parties working on our behalf in order to facilitate and support our relationship with you.
- **Law enforcement and other government agencies.** We may share your personal data with law enforcement and/or other government agencies to comply with legal requirements, to enforce or apply our Terms and Conditions and other agreements, and to protect our rights, property, and the safety of our employees, clients, and third parties.
- **Companies involved in a corporate transaction with us.** If we acquire insurance portfolios/ companies, sell some or all our assets, merge, or are acquired by another entity or otherwise restructure our business, either through a sale or in connection with a bankruptcy, we may share your personal data with that entity.

6 Cross-Border Transfers of Personal Data

In some instances, we may need to transfer your personal data from the originating jurisdiction to another jurisdiction for processing. Where Personal Data is transferred outside the jurisdiction where it was collected, we will only do so where this is permitted under applicable laws. We will implement appropriate legal mechanisms and safeguards to ensure that your personal data remains adequately protected upon reaching its destination, as required by applicable data protection law.

Our global operations expand across several jurisdictions. In some instances, it may be necessary for us to transfer your personal data to a Monument Group entity or to a third party outside of the jurisdiction where it was collected. Third party recipients include organisations with whom we engage to deliver our products and services to you. In doing so, we utilise a number of legal mechanisms to ensure that your data remains protected to a standard equivalent to that afforded to it in the country of origin.

To find out more about the mechanisms in place, please contact us.

7 Tax sharing obligations

To comply with international tax obligations, we may share your information and the information you have provided us in relation to any individuals and entities connected with your policy with Irish Revenue, for the purposes of both the FATCA and CRS. For FATCA, we must report a US connection and for CRS, we must report non-Irish residency. The information we share with Irish Revenue will include name, address, date of birth, tax identification number, policy number and policy value. In accordance with legislation, Irish Revenue will exchange this information with the Internal Revenue Service for FATCA purposes if there is a US connection, and for CRS, they will share it with the relevant tax authorities. For more information, please visit Irish Revenue's website www.revenue.ie

8 How we Protect and Secure Your Data

MLIDAC has implemented technological and operational security procedures designed to protect your personal data against accidental or unlawful loss, disclosure, misuse, alteration, or use.

We limit access to your personal data only to employees and third parties on a business need to know basis. Third parties will only process your personal data upon our instructions, and they are subject to a duty of confidentiality. We have implemented procedures to respond appropriately to any suspected personal data breach or security incident.

9 Retention and Disposal of Personal Data

We have measures in place to ensure that we do not retain your personal data for longer than is necessary, in line with legal, regulatory, and legitimate business requirements.

Upon reaching the end of its retention period, we will take steps to review your personal data. We may continue to hold your personal data if we identify another legal purpose for doing so.

If there is no longer a purpose or legal basis for holding your Personal Data, we will dispose of it in a secure and permanent manner, in accordance with applicable data protection laws and regulations.

10 Individual Privacy Rights

Individuals have a number of rights in relation to their personal data under the GDPR.

The specific data protection rights applicable to you are detailed in the table below. Please note that these data protection rights are not absolute and there may be circumstances where we may legitimately deny a request as allowed for under the GDPR. You will not normally have to pay a fee to access your personal data, although we may charge a reasonable fee if your request is unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information and/or documentation from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of the other rights stated below). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We strive to respond to all legitimate requests within the relevant deadlines pursuant to the GDPR. Occasionally, it may take us longer to respond if your request is particularly complex or you have made a number of different requests. In this case, we will notify you of estimated response timelines.

INDIVIDUAL PRIVACY RIGHTS		European Union (EU)
Right to Information	The right to receive the information set out in this Notice regarding our processing of your Personal Data.	✓
Right to Object/ Opt Out	The right to opt out of our processing of your Personal Data in certain circumstances (e.g., direct marketing, Personal Data sale, automated decisions, profiling).	✓
Right to Restriction	The right to ask us to suspend the processing of your Personal Data in specific circumstances.	✓
Right to Delete	The right to request us to delete or remove Personal Data where there is no lawful reason for us continuing to process it.	✓
Right to Access	The right to receive a copy of or otherwise access Personal Data we hold about you.	✓
Right of Rectification	The right to request that we correct or complete inaccurate Personal Data we might hold about you.	✓
Right to Portability	The right to obtain and reuse your Personal Data for your own purposes across different services.	✓
Right to Complain/ Appeal	The right to lodge a complaint with a competent supervisory authority and/or appeal directly to us against a decision regarding Personal Data.	✓
Right to Withdraw Consent	The right to withdraw consent at any time that you may have provided to us for processing your Personal Data (where the Legal Basis we rely on is consent).	✓

11 Contact Us

If you have questions, concerns, and/or complaints regarding this Notice or you wish to make a request please contact us as follows:

- Email: MonumentOps@monumentinsurance.com
- Or write to us at: Monument Life Insurance DAC, Two Park Place, Hatch Street Upper, Dublin 2, Ireland.

You also have the right to lodge a complaint with the Data Protection Commissioner (“DPC”) should you remain unsatisfied. We would, however, appreciate the chance to deal with your concerns before you approach the DPC so please contact us in the first instance.