

UnitedHealthcare Global Privacy Notice

Your Right to Privacy

At UnitedHealthcare Insurance dac (trading as UnitedHealthcare Global) we respect your rights to privacy and the protection of your personal data. The purpose of this privacy notice is to explain how we routinely collect and use personal data about individuals, including brokers **“you”** for the provision of our products and services and what rights you have in relation to your personal information.

UnitedHealthcare Global is the primary data controller for processing your personal information. Throughout this document references to “we”, “us” “our” or “the company” refer to UnitedHealthcare Insurance dac and its subsidiaries and affiliated companies.

Different Types Of Information We Collect About You

To allow us to provide our products and services and to run our business we collect and process various categories of personal contact information about you. We will hold:

- General information to identify you including your contact information, such as
 - Your name
 - Your email address
 - Your contact telephone number (landline & mobile)

How We Collect Your Personal Data

We will do this in a few ways including:

- Information collected directly from you during the engagement process when putting in place an intermediary agreement; and
- Information collected directly from you during the application process for a health insurance plan for your clients.

How We Use Your Personal Information

We will use your personal information:

- To facilitate an application for a health insurance contract for your clients
- If the plan is accepted, to facilitate the administration of the plan for your clients
- Administer our agreement with you
- Communicate with you, such as inviting you to organised events

Our Legal Basis for Processing Your Personal Information

We use, and share, your data where:

- The use is necessary for the performance of the agreement that has been entered into by you
- It is necessary for our legitimate interests, including as described above, It is necessary for compliance with our legal obligations, such as complying with regulatory audits
- Where we have obtained consent from you

Implications of Not Providing Your Personal Data

If you do not provide personal information we may not be able to enter in to an agreement with you, manage the on-going administration of your client account or communicate directly with you.

Sharing Your Information

When providing our services to you, we may share your information with:

- Other insurers who work with us to help manage the underwriting process and administer our policies;
- Third party administrators who work with us to help manage the underwriting process, administer our policies and help us manage the claims process
- Limited members of personnel within the company
- UnitedHealth Group companies
- Third parties in connection with any sale or transaction involving all or a portion of the business
- Statutory and regulatory bodies.

Transferring Outside the European Economic Area (EEA)

In some cases these personnel and authorised third-party vendors may be located outside of the EEA, including in countries that may not provide the same level of data protection as your home country. We will always take appropriate steps to ensure that such personnel and third-party vendors are bound to duties of confidentiality and we have implemented measures such as standard data protection contractual clauses to ensure that any transferred Personal Data, remains protected and secure. A copy of these clauses can be obtained by contacting us at the address listed below in the “How to Contact Us” section.

How Long We Hold Your Data

We will retain your personal information only for so long as reasonably necessary for the purposes set out above, in accordance with applicable laws.

Your Rights

You have certain enhanced rights in relation to how we use your information and the manner in which we process it.

This includes:

- A right to access to your personal information
- A right to request us to correct inaccurate information or update incomplete information
- A right to request that we restrict processing of your information in certain circumstances
- A right to object to us processing your personal information for our legitimate business interests or direct marketing purposes
- A right to have your information deleted or our use of your data restricted in certain circumstances. We may be unable to comply with a data deletion request where doing so would place us in breach of our obligations

under applicable laws, regulation or codes of practice. However, in some circumstances, you may be able to request that your data be blocked from further processing

- A right to data portability (i.e. obtain a transferable copy of your information we hold to another provider) in certain circumstances
- A right to withdraw consent at any time where processing is based on consent

If you wish to exercise any of your data rights, you can contact us at euprivacy@uhcglobal.com. If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests) we may extend this period by a further two calendar months and shall explain the reason why.

If you have a complaint or concern about how we use your personal data, please contact us in the first instance euprivacy@uhcglobal.com and we will attempt to resolve as soon as possible. You also have the right to complain to the Data Protection Commission or another supervisory authority at any time.

Data Security

We maintain reasonable security measures to safeguard Personal Data from loss, interference, misuse, unauthorised access, disclosure, alteration or destruction. We are committed to ensuring your information is secure with us and the Third Parties who act on our behalf.

How to Contact Us

If you have any questions about how we use your information, you can contact us at euprivacy@uhcglobal.com. In addition you can contact our Data Protection Officer at any time at uhg_privacy_office@uhc.com

Updates

We reserve the right in its sole discretion to amend this privacy statement at any time, you should regularly check this privacy statement for any amendments.

Dated: 28 March 2019