

MetLife

Template EU Privacy Notice for intermediaries

MetLife strongly believes in protecting the confidentiality and security of your [personal data](#). This document is referred to as our “Privacy Notice for intermediaries” or throughout this document our “Privacy Notice” and describes how we use the personal data that we collect and receive about our [Intermediaries](#).

This Privacy Notice contains some terms which you may need help understanding. The most commonly used terms are listed in the [Glossary](#) at the end of our Privacy Notice.

[How to get more help](#)

If you want help with our Privacy Notice or have questions about it, please contact our Data Protection Officer whose contact details are below:

Phone: +357 22845670

E-mail: CyprusDPO@metlife.com

If you are unhappy about any aspect of the way we collect, share or use your personal data, we would like you to tell us. You can contact us using the details above.

If you are not happy with our response, you have a right to complain to Commissioner for Personal Data Protection at 1 Iasonos street, 2nd floor, 1082 Nicosia; tel: 22818456; fax: 22304565; email: commissionerdataprotection.gov.cy; www.dataprotection.gov.cy

[What are your rights?](#)

We have set out a summary of your rights regarding your personal data below. Further details about your rights are contained in the [Your Privacy Rights](#) page:

Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we’re providing you with the information in this Privacy Notice.
2. The right of access	You have the right to obtain access to your personal data (if we’re processing it), and other certain information (similar to that provided in this Privacy Notice).

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	<p>This is so you're aware and can check that we're using your personal data in accordance with data protection law.</p> <p>For more information, see the Accessing your information section below.</p>
3. The right to rectification	<p>You're entitled to have your personal data corrected if it's inaccurate or incomplete.</p> <p>For more information, see the Correcting your information section below.</p>
4. The right to erasure	<p>This is also known as 'the right to be forgotten' and enables you to request the deletion or removal of your personal data where there's no compelling reason for us to keep using it. This is not an absolute right to erasure. We may have a right or obligation to retain the information, such as where we are under a legal obligation to do so or have another valid legal reason to retain it.</p> <p>For more information, see the Erasing your information section below.</p>
5. The right to restrict processing	<p>In certain situations you have the right to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their personal data to be 'blocked' to make sure the restriction is respected in future.</p> <p>For more information, see the Restricting processing of your information section below.</p>
6. The right to data portability	<p>You have rights to obtain a copy of some of the personal data that we hold on you and reuse or share it for your own purposes.</p> <p>For more information, see the Taking your personal data with you section below.</p>
7. The right to object	<p>You have the right to object to certain types of processing. For more information, see the Objecting to processing section below.</p>

[About us](#)

We are MetLife Europe d.a.c. (Cyprus Branch) ("**MetLife**"). MetLife is a limited liability company incorporated in the Republic of Ireland with registration number 415123 and registered office at 20 on Hatch, Lower Hatch Street, Dublin 2, Ireland. Its Cyprus Branch is registered with the Registrar of Companies with registration number AE2955 and registered address at 38 Kennedy Avenue, 1087 Nicosia, Cyprus.

MetLife is the [controller](#) of your personal data.

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How we learn about you

What we know about you is mostly provided by you when you apply and/or start to cooperate with us and whilst you are working as our Intermediary. You provide us with personal data at various times and via various communication channels including phone, email and text, for example when you:

- request information about the ways you can work with us as an Intermediary, or apply to become our Intermediary;
- are assessed and/or interviewed in connection with your application;
- accept an offer from us to work as our Intermediary;
- work as our Intermediary; or
- stop working as our Intermediary.

Additionally, we may be provided with the types of personal data listed below in the section [What we learn about you](#):

- from publically available information that you post online on social networking sites such as LinkedIn and Facebook; or
- from trusted third parties, such as recruitment agencies, headhunters, screening service providers and outsourcing agencies;
- for customers of MetLife that interact with you;
- from regulatory, tax and other public authorities; and
- in the case of Intermediaries that work for a company or under a unit or team, from your employer company or from your unit or agency manager.

We may need to check the personal data we have about you to make sure it is correct and complete with other sources such as health care providers (e.g. in the case you need support due to a medical condition or disability). Some of our sources may provide us with [special categories of personal data](#) about you and/or reports relating to you.

What we learn about you

The types of personal data we hold may include:

Type of Personal Data	Purposes of use - Please see Why we need your personal data below for more information on the purposes listed
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<p>Identification information including: your first name(s) and surname, age, date of birth, gender, marital status, number of dependents, language of communication; nationality; Identity number, tax identification number, intermediary status and registration number, and right to work documentation.</p>	<ul style="list-style-type: none"> • Legal and regulatory compliance • Managing Intermediaries and resources. • Managing operations • Attracting, selecting, assessing and appointing suitable candidates • Authentication and security purposes • Administering our medical and life insurance plans for Intermediaries (in case you participate in them).
<p>Information about your health and disabilities: these types of information are classified by law as “<i>special categories of personal data</i>”, including results of medical check-ups and reports of accidents at work.</p>	<ul style="list-style-type: none"> • Legal and regulatory compliance • Managing Intermediaries and resources • Managing operations • Administering our medical and life insurance plans for Intermediaries (in case you participate in them). <p>Please also see the section on Special categories of personal data below.</p>
<p>Your contact information including: e-mail and telephone details (business and personal), home and work address.</p>	<ul style="list-style-type: none"> • Legal and regulatory compliance • Managing Intermediaries and resources • Monitoring business communications
<p>Emergency contact information including: contact details of your relatives / other individual whose information you have provided for emergency purposes.</p>	<ul style="list-style-type: none"> • Managing Intermediaries and resources
<p>Recruitment information including:</p> <ul style="list-style-type: none"> • information contained in your CV and/or letter of application; • prior work, activities, background and references; • education and training history and records; • economic information such as amounts due to other insurance companies and solvency status (e.g. whether you have been declared bankrupt and have not been discharged); • regulatory information (e.g. registration and authorisation details and status); • information on criminal convictions and criminal record; • other information required to be obtained by law 	<ul style="list-style-type: none"> • Managing Intermediaries and resources • Managing operations

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<p>before the commencement of our cooperation;</p> <ul style="list-style-type: none"> • languages spoken and other relevant skills; • arrangements with other insurance companies and interests in other organisations or activities; • interview records and any interview feedback, recruitment assessment details and competency test results. 	
<p>Information about your cooperation with MetLife including: terms of your intermediary agreement with MetLife, agency or unit, location, date of commencement and termination of your cooperation with us, reporting agency or unit manager name.</p>	<ul style="list-style-type: none"> • Legal and regulatory compliance • Managing Intermediaries and resources • Managing operations
<p>Financial and Payment information including: commission and other compensation, finance arrangements, account balances, amounts due to or payable from us,, currency, bank account details.</p>	<ul style="list-style-type: none"> • Legal and regulatory compliance • Managing Intermediaries and resources • Managing operations
<p>Information about your performance including: feedback from agency or unit managers and other stakeholders, performance ratings, targets and sales achieved, information on the portfolio serviced.</p>	<ul style="list-style-type: none"> • Managing Intermediaries and resources • Legal and Regulatory Compliance
<p>IT information including: information about your use of MetLife information systems and devices, including computer systems, laptops, phones and other telecommunications devices, networks, software, internet usage and emails and other communications sent from and received on MetLife email accounts or using MetLife systems or devices, and any information required to access company systems and applications (such as system ID).</p>	<ul style="list-style-type: none"> • Managing Intermediaries and resources • Managing operations • Managing security • Monitoring business communications
<p>Media information: photographs, videos and quotes released to the media and photographs for internal networks, office security passes and access control systems.</p>	<ul style="list-style-type: none"> • Managing operations • Managing security

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Why we need your personal data

We use the personal data we have about you for the following purposes:

(A) Legal and regulatory compliance	<p>This includes where MetLife is required to process personal data based on a legal or regulatory obligation, including applicable laws relating to:</p> <ul style="list-style-type: none">• insurance regulation;• immigration;• tax and national insurance; and• health and safety. <p>It also includes where we need to process personal data for the purposes of:</p> <ul style="list-style-type: none">• establishing, exercising or defending legal claims (including defending MetLife against litigation);• record keeping and reporting obligations;• risk management activities;• compliance with government inspections and other requests from government, law enforcement agencies or other public authorities.
(B) Managing Intermediaries and resourcing	<p>This includes business practices related to:</p> <ul style="list-style-type: none">• recruitment (i.e. the process of attracting, selecting, assessing and appointing suitable candidates);• the establishment, maintenance and termination of the intermediary;• Intermediaries management;• performance of the intermediary contract;• payment of commission and other compensation;• administering our medical and life insurance plans for Intermediaries (in case you participate in them).• facilitating business travel arrangements;• managing work schedules;• reporting on absence (such as sickness);• training our Intermediaries;• business travel monitoring;• monitoring and collecting the amounts due to us from you or our customers;• incident investigation and reporting;• disciplinary proceedings and terminations;• performance evaluation;• maintaining intermediary directories;• handling workforce relations; and

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	<ul style="list-style-type: none"> • providing support.
(C) Managing operations	<p>This includes business practices related to MetLife’s day-to-day business activities, including:</p> <ul style="list-style-type: none"> • monitoring compliance with MetLife policies and codes of practice; • strategic planning and budgeting; • project management; • compilation of audit trails and other reporting tools; • financial management and reporting; • preparing business marketing materials; • allocating MetLife assets and resource management (allocation of office space, meeting rooms bookings, IT appliances); • facilitating communication in an emergency; • ensuring an effective and systematic disaster recovery system and plan; • mergers and acquisitions; • re-organisations or dispositions (including due diligence and audits); • supporting facilities management; • internal auditing; and • supplier management.
(D) Managing security	<p>This includes for:</p> <ul style="list-style-type: none"> • securing MetLife IT and communications network and systems; • securing company information and company premises; • vetting prospective Intermediaries; and • authorising access by Intermediaries and guests to MetLife premises.
(E) Monitoring business communications	<p>External calls from or to the customer service department are recorded for the following purposes:</p> <ul style="list-style-type: none"> • for checking the standards of service that we are providing; • to evaluate performance; and • for internal training purposes.
(F) Administering our medical, life and pension insurance plans for Intermediaries	<p>Where you participate in our medical and life insurance plans for Intermediaries we will use your personal data, including special categories of personal data about you, in order to administer these insurance plans and your participation in them. When we do use your personal data for these purposes, we will do so in accordance with the privacy policy that is</p>

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	applicable to our customers generally. Please click here to view this policy cookie policy.
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How we deal with special categories of personal data

We may receive, collect or otherwise process [special categories of personal data](#) about you which are more sensitive, including data concerning your health, where you have provided your explicit consent or otherwise where this is necessary:

- to protect your vital interests or the vital interests of another person, if you or they are incapable of providing consent;
- for the establishment, exercise or defence of legal claims;

The legal basis for our processing of personal data which is not a special category of personal data

The legal basis for our processing of personal data which is not a [special category of personal data](#) will depend on why we process your information. We may process such data where this is necessary:

- for the performance of a contract with you (such as an intermediary agreement) or to take steps at your request prior to entering into this contract;
- to comply with our legal and regulatory obligations, including those listed in (A) above;
- to protect your vital interests or the vital interests of another person, e.g. where you or they are seriously injured or ill; or
- for our legitimate interests in:
 - ensuring that we can effectively recruit and manage our Intermediaries;
 - protecting the health and safety of our people;
 - protecting the security of our premises, people and assets (including our IT and communications systems);
 - fraud prevention;
 - facilitating business communications;
 - collecting the amounts due to us;
 - our internal business purposes which may include business and disaster recovery, document retention/storage, IT service continuity (e.g. back-ups and helpdesk assistance), to ensure the quality of the insurance products and services we provide to our customers;
 - enabling corporate transactions to take place; and
 - providing insurance products and services to our customers and to administer and manage our relationship with them.

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We consider the risk to your rights of data protection in connection with personal data that we process on the basis of our legitimate interests is not excessive or overly intrusive. We have also put in place protections for your rights by appointing a Data Protection Officer, ensuring proper retention periods and security controls, using firewalls, virus software and anti-spyware tools, automatic updates, patches and security updates, limiting access to staff only to the information needed for the performance of their task, using password protection, encryption, regular back-ups, removing all personal information before old computers disposal, shredding confidential waste, ensuring physical security, and implementing regular staff training.

Where you use our website, we will process your personal data collected by using cookies in accordance with our cookie policy. Please [click here](#) to view our cookie policy.

How we disclose your personal data

We may use and share your personal data with other companies in the MetLife group:

- for the purposes of centralised data storage, hosting and management;
- in connection with the operation of our Intermediaries directories;
- so that other group companies can perform research for us;
- to audit our business; and
- as required in accordance with our grievance process.

We may share your personal data with our third party service providers and business partners, including:

- third party technology provider(s) who provide cloud infrastructure in which data is hosted and IT support services to the MetLife group;
- the agency or unit to which you are assigned;
- businesses that:
 - recruit Intermediaries on our behalf;
 - provide us with marketing services;
 - process our payments;
 - assess and report on risks in the workplace; and
 - provide us with professional advice (such as lawyers and accountants),

in each case where necessary for performance of any contract that we have in place with them.

When we share your personal data with third parties who perform services for us, we require them to take appropriate steps to protect your personal data and only use the personal data for the purpose of performing those services.

We may also share your personal data:

- with health professionals including doctors and medical centres where we are providing

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health or other insurance to you or in connection with absences due to ill health, to perform medical check-ups and to help us to make reasonable adjustments for disabilities and in connection with medical incidents in the workplace;

- with tax or other governmental or regulatory authorities (such as the Superintendent of Insurance);
- if we sell or buy any business or assets, in which case we may disclose your personal data to the potential seller or buyer of such business or assets;
- if MetLife or substantially all of its assets are acquired by a third party, in which case your personal data may be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of MetLife, our [Intermediaries](#), customers, or others;
- with professional advisors and consultants, including legal advisors, and our external auditors; and
- for the purposes of doing what a court, regulator or public authority requires us to do, for example, complying with a search warrant or court order or acting as required or permitted by applicable law or regulation.

Access to your special categories of personal data (e.g. information regarding your health) is limited to a strict “need to know” basis only. Furthermore, access to your health information is also available (again on a strict “need to know” basis only) to employees and other persons involved in the administration of our medical and life insurance plans for Intermediaries (in case you participate in them).

How we protect your personal data

The security and confidentiality of your personal data is extremely important to us. We have technical, administrative, and physical security measures in place to:

- protect your personal data from unauthorised access and improper use;
- secure our IT systems and safeguard the information; and
- ensure we can restore your data in situations where the data is corrupted or lost in a disaster recovery situation.

Where appropriate, we use encryption or other security measures which we deem appropriate to protect your personal data. We also review our security procedures periodically to consider appropriate new technology and updated methods. But, despite our reasonable efforts, no security measure is ever perfect or impenetrable.

Where we transfer your information

We may transfer your personal data to other countries. The countries in the European Economic Area are considered to provide the same level of protection to personal data. Where we transfer personal data or share it with others outside the European Economic Area, we will ensure that we and those persons or companies who we transfer it to agree to protect it from improper use or disclosure, in accordance with data protection law by [model clauses](#) or other appropriate

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mechanisms. You can request further details and a copy of these by contacting us using the details in the section at the beginning of the Privacy Notice headed 'How to get more help'.

Companies outside the European Economic Area with whom we may share your personal data include our other group companies, IT providers and other suppliers and service providers.

How long will we keep your information?

MetLife retains your information for no longer than is necessary for the purposes for which the information is collected.

Our data retention policies comply with all applicable laws and privacy legislation to which we are subject. They set out how long we are allowed to retain different types of data we hold and are reviewed on a regular basis.

Our retention periods take into account:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- (potential) disputes; and
- guidelines issued by relevant data protection authorities and other relevant regulatory authorities.

We safely and securely destroy data which we no longer need to keep in accordance with time limits set out in our policies.

When we continue to use data for statistical or research purposes, we ensure that the data is anonymised so that you cannot be identified by or from it in any way.

How will you know if we amend this Privacy Notice?

We may amend this Privacy Notice at any time. If we make any material change in how we collect your personal data, or how we use or share it, we will notify you by posting new policy on our.[consider how to notify e.g. posting new policy on intranet available to intermediaries]

Governing law

This Privacy Notice is governed by the laws of the Republic of Cyprus.

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YOUR PRIVACY RIGHTS

This section explains your rights in relation to your personal data in more detail. The various rights are not absolute and are subject to certain exceptions or qualifications.

Further information and advice about your rights can be obtained from the Commissioner for Personal Data Protection at 1 Iasonos street, 2nd floor, 1082 Nicosia; tel: 22818456; fax: 22304565; email: commissionerdataprotection.gov.cy You are entitled to receive your personal data free of charge except in the following circumstances where we may charge a reasonable fee to cover our administrative costs of providing the personal data for:

- manifestly unfounded or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll let you know.

In order to exercise any of the rights described below please contact us using the details in the section at the beginning of the Privacy Notice headed 'How to get more help'.

How can we help?

[Accessing your information](#)

[Correcting your information](#)

[Erasing your information](#)

[Restricting processing of your information](#)

[Taking your personal data with you](#)

[Objecting to processing](#)

Accessing your information

What can you request access to?

You have the right to:

- receive confirmation from us that your personal data is being processed;
- access to your personal data; and
- certain other information (most of which should be in our personal data notice anyway).

You can request copies of paper and electronic records (including recorded calls, where applicable) about you that we hold, share or use. To deal with your request, we can request proof of identity and enough personal data to enable us to locate the personal data you request.

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When will access not be provided?

We can only provide you with *your personal data*, not personal data about another person. Also, where access would adversely affect another person's rights, we're not required to provide this. Due to legal privilege, we may not be able to show you anything that we learned in connection with a claim or legal proceeding.

Please clearly set out in your access request the personal data that you're requesting. If this is not clear, we may come back to you to ask for further personal data by way of clarification.

Correcting your information

You have the right to obtain from us without undue delay the correction of inaccurate personal data concerning you. If you tell us that the personal data we hold on you is incorrect, we will review it and if we agree with you, we will correct our records. If we do not agree with you we will let you know. If you wish, you can tell us in writing that you believe our records still to be incorrect and we will include your statement when we give your personal data to anyone outside MetLife. You can contact us using the details in the section at the beginning of the Privacy Notice headed 'How to get more help'.

You may also have the right to have incomplete personal data completed, including by means of providing a supplementary statement. Whether or not this is appropriate in any particular case depending on the purposes for which your personal data is being processed.

We need to notify any third parties with whom we've shared your personal data that you've made a rectification request (see "[Why we need your personal data](#)"). We'll take reasonable steps to do this, but if it is not possible or may involve disproportionate effort we may not be able to do this or ensure they rectify the personal data they hold.

How You Can See and Correct Your Personal Data

Generally, we will let you see the personal data that we hold about you, or take steps to correct any inaccurate information, if you ask us in writing.

Due to legal privilege, we may not be able to show you anything that we learned in connection with a claim or legal proceeding.

Erasing your information

When can you request erasure?

Subject to the section below "[When can we refuse erasure requests?](#)", you have a right to have your personal data erased, and to prevent processing, where:

- the personal data is no longer necessary for the purpose it was originally collected/processed;
- you withdraw consent (where previously provided and required for us to process such data);
- you object to the processing and our legitimate interests in being able to keep processing your personal data don't take priority;

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- we've been processing your personal data in breach of data protection laws; or
- the personal data has to be erased in order to comply with a legal obligation.
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When can we refuse erasure requests?

The right to erasure does not apply where your information is processed for certain specified reasons, including for the exercise or defence of legal claims or to allow us to administer and manage the relationship between you and MetLife.

More importantly, if we have to erase your data we may not be able to provide you with cover under the pension, medical and life insurance plans for intermediaries, in case you participate in them, if we need to process the erased data in connection with their administration, management or provision.

Do we have to tell other recipients of your personal data about your erasure request?

Where we have provided the personal data you want to be erased to third parties (see [“Why we need your personal data”](#)), we need to inform them about your erasure request, so they can erase the personal data in question. We'll take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

It may also be that the recipient is not required/able to erase your personal data because one of the exemptions above applies – see [“When can we refuse erasure requests?”](#)

Restricting processing of your information

When is restriction available?

You have the right to restrict the processing of your personal data:

- where you disagree with the accuracy of the information, we need to restrict the processing until we've verified the accuracy of the information;
- when processing is unlawful and you oppose erasure and request restriction instead;
- if we no longer need the personal data but you need this to establish, exercise or defend a legal claim; or
- where you've objected to the processing in the circumstances detailed in paragraph (a) of [“Objecting to processing”](#) below, and we're considering whether those interests should take priority.

Do we have to tell other recipients of your personal data about the restriction?

Where we've disclosed your relevant personal data to third parties, we need to inform them about the restriction on the processing of your information, so that they don't continue to process this.

We'll take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

We'll also let you know if we decide to lift a restriction on processing.

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Taking your personal data with you

When does the right to data portability apply?

The right to data portability only applies:

- to personal data you've provided to us (i.e. not any other information);
- where the processing is based on your consent or for the performance of a contract; and
- when processing is carried out by automated means.

When can we refuse requests for data portability?

We can refuse your data portability request if the processing does not satisfy the above criteria. Also, if the personal data concerns more than one individual, we may not be able to transfer this to you if doing so would prejudice that person's rights.

Objecting to processing

You can object to processing in the following circumstances: Legitimate interests

You've the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on legitimate interests.

If we can show compelling legitimate grounds for processing your personal data which override your interests, rights and freedoms, or we need your personal data to establish, exercise or defend legal claims, we can continue to process it. Otherwise, we must stop using the relevant information.

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GLOSSARY

Controller is the person or organisation which decides the purposes and means of the processing of personal data either on its own or with others.

Intermediaries means insurance intermediaries that carry on insurance distribution activities in respect of MetLife products and includes without limitation, insurance consultants, agents, tied agents and brokers.

Model clauses are standard contractual clauses which have been approved by the European Commission as providing adequate safeguards to enable personal data to be transferred outside the European Economic Area.

Personal data is any personal information relating to an individual who can be identified, directly or indirectly, by reference to that information.

Processing means any operation or set of operations which is performed on personal data such as collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure, erasure or destruction.

Special categories of personal data are types of personal data which might show a person's race, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, details about their health and any genetic or biometric data. Under GDPR personal data relating to criminal offences and convictions are not expressly covered by this term. However in some local jurisdictions this term (or a similar term such as "sensitive personal data") may include them.