

## DATA PRIVACY NOTICE

### MetLife Cyprus

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

Our Privacy Notice contains some terms which you may need help understanding. These 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:

Data Protection Officer

**Address:** MetLife, 38 Kennedy Avenue, Nicosia, 1087, Cyprus.

**Telephone:** +357 22845670

**E-mail:** [CyprusDPO@metlife.com](mailto: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 the Commissioner for Personal Data Protection at 1 Iasonos street, 2<sup>nd</sup> floor, 1082 Nicosia; tel: 22818456; fax: 22304565; email: [commissionerdataprotection.gov.cy](mailto:commissionerdataprotection.gov.cy); [www.dataprotection.gov.cy](http://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](#) section below.

#### Rights

1. The right to be informed

#### What does this mean?

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

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|                                     | that provided in this Privacy Notice).                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                     | This is so you're aware and can check that we're using your personal data in accordance with data protection law.                                                                                                                                                                                                                                                                                                                                                                                         |
|                                     | For more information, see the <a href="#">Accessing your information</a> section below.                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 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 <a href="#">Correcting your information</a> 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 <a href="#">Erasing your information</a> 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 <a href="#">Restricting processing of your information</a> 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 <a href="#">Taking your personal data with you</a> section below.</p>                                                                                                                                                                                                                                                              |
| 7. The right to object              | <p>You have the right to object to certain types of processing, including processing for direct marketing (which we do only with your consent). For more information, see the <a href="#">Objecting to processing</a> section below.</p>                                                                                                                                                                                                                                                                  |
| 8. Rights in relation to            | Currently MetLife does not use any technology for automated                                                                                                                                                                                                                                                                                                                                                                                                                                               |

automated decision  
making and profiling

decision making and profiling. If MetLife in the future adopts such technology, you will be notified and this Privacy Notice will be updated accordingly.

## Who we are

We are MetLife Europe d.a.c. ("**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 AE 2955 and registered address at 38 Kennedy Avenue, 1087 Nicosia, Cyprus ("MetLife Cyprus").

Metlife will be the [controller](#) of your personal data.

## How we contact you

We may contact you through one or more of the following communications channels: by telephone, mail, email, text (SMS) message or other electronic means. We may also directly contact you through face to face meetings.

We record all telephone calls to monitor our services and for audit and training purposes. We store call and other communication recordings securely in accordance with our retention policies and applicable laws. Access to those recordings is restricted to those individuals who have a need to access them for the purposes set out in this notice.

## What we learn about you

The types of personal data we hold may include your:

- name;
- contact details including home and work address, email details and phone numbers;
- policy number;
- financial personal data including account details for direct debits;
- passport or ID card number and social insurance number;
- age or date of birth;
- gender, occupation;
- hobbies, recreational activities or sports;
- details of any criminal convictions;
- employment details;
- family details;
- information on life style and social circumstances;

- information on the products and services provided to you;
- education details; and
- [special categories of personal data](#) (see further the section on [Special categories of personal data](#) below).

### How we learn about you

What we know about you is mostly provided by you when you first contact us and whilst you are our customer. You may provide us with personal data at various times and via various communication channels including phone and email, for example when you:

- request information about, or apply for, one of our insurance products or services;
- ask to have a MetLife representative or intermediary contact you;
- participate in any MetLife promotion or survey;
- make a policy amendment or claim; or
- make a complaint.

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

- by your employer if we are providing insurance cover for its group employee benefits scheme;
- by the policyholder if you are covered under a group policy; or
- from publically available information that you post online on social networking sites such as LinkedIn and Facebook
- by banks/credit institutions and insurance intermediaries who sell our insurance products and services.

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 your relatives, employers, health care providers, [credit reference agencies](#), other insurers, financial advisers, other financial services providers, consumer reporting and [anti-fraud agencies](#). Some of our sources may provide us with [special categories of personal data](#) about you and/or reports relating to you.

### How we deal with special categories of personal data

We may receive or collect [special categories of personal data](#) about you which are more sensitive, including data concerning your health, racial or ethnic origin and biometric data.

Where we are legally required to obtain your consent to process these [special categories of personal data](#) we will ask you for it at the relevant time. If you choose not to give your consent we may not be able to perform some of the tasks we need to in order to provide certain products or services to you and may in some cases need to cancel your policy or your insurance cover or end our relationship with you as a consequence.

### **Why we need your personal data**

We use the personal data we have about you to:

- provide insurance to you and for activities relating to that insurance including claims and renewals;
- check your identity and to comply with our legal and regulatory requirements;
- provide you with the information, products and services that you request from us;
- administer our relationship with you whilst you are a customer and to communicate with you;
- check your instructions to us;
- analyse, assess and improve our services to customers;
- investigate any complaint you may make;
- provide evidence in any dispute or anticipated dispute between you and us;
- provide you with marketing information where you have consented to direct marketing (please also see the section headed [Direct Marketing](#) below);
- notify you about changes to our insurance products and services;
- train our staff;
- monitor the quality of our insurance products and services;
- aggregate it on an anonymous basis with other data for data analytical and reporting purposes;
- combine with personal data from other sources for the purposes set out in the bullet points above.

### **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 categories of personal data](#) will depend on why we process your information.

Where you wish to enter into or have signed a contract with us to provide insurance products and services, we will process your personal data to enable us to enter into and perform the contract.

Where you use our website, we will process your personal data collected by using cookies in accordance with our cookie policy. You can find our cookie policy in the below link:

[CookiePolicy.pdf](#)

We may also need to process your personal data to comply with our legal obligations including in relation to performing anti-money laundering, terrorism prevention and sanctions screening checks, complaints and investigations or litigation.

We also have a legitimate interest to process your personal data for:

- claims analysis including to assist in our product pricing;
- the purposes of underwriting and administering your policy and dealing with any claims under it which may include data sharing with other companies within the MetLife group, intermediaries, [reinsurers](#) and others (please also see [How we disclose your personal data](#));
- communications purposes;
- marketing analytics including marketing campaign optimisation and web analytics but only in an anonymised form to enable us to develop and target the marketing of our products and services;
- ongoing management of our relationship with you and to maintain contact with you (e.g. providing annual updates);
- administration and management of our relationship with your insurance intermediary;
- 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 you;
- corporate transactions (please also see the section below [How we treat personal data on a business sale](#));
- portfolio analysis and experience studies to enable us to improve the insurance products and services we offer to customers.

Where you have given us your permission to do so, we will use relevant personal data to enable us to provide you with information about products, special offers and services that may be of interest to you.

We will always seek your consent to process personal data where we are legally required to do so.

## How we disclose your personal data

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

- help us evaluate your request for insurance products or services;
- help us administer your insurance policy and process claims and other transactions;
- confirm or correct what we know about you;
- help us prevent fraud, money laundering, terrorism and other crimes by verifying what we know about you;
- perform research for us;
- comply with the law by, for example, to enable sharing your personal data with the police or fraud agencies where necessary to prevent fraud;
- audit our business;
- provide you with information about MetLife, our products, special offers and services that may be of interest;
- fulfil other business purposes such as product development and website administration.

We may share your personal data with our professional advisers, insurance intermediaries and other third parties who help us provide insurance products and services to you. For example we may share your personal data:

- to comply with the law or rules of any regulatory body whose rules apply to MetLife;
- with [credit reference agencies](#), police, consumer reporting and [fraud prevention agencies](#) to check your identity, credit history and whether you have any criminal record when we process an application or claim;
- with other insurers and financial services providers to prevent and detect fraudulent and exaggerated claims;
- with third party administrators to assist us in the administration of your insurance policy or any claim you may make under it;
- with third parties that assist as in providing benefits in kind under your insurance policy;
- with companies that print and distribute mailings or, where you have provided your consent, with companies that perform marketing purposes on our behalf;
- with the insurance intermediary that is assisting you so that they can advise and provide their services to you;
- third parties who perform business services for us or provide their services to us, such as document retention/storage services, printing services and mailing services;

- with [reinsurers](#) who help to manage our business and reduce the risks associated with underwritten insurance policies by spreading our risks across alternative institutions;
- with [insurance brokers](#) who help us arrange insurance for you;
- with banks and intermediaries who sell our insurance products and services for us;
- with health professionals including doctors and medical centers where we are providing health insurance to you; and
- with professional advisors and consultants, including legal advisors, and our external auditors.

When we share your personal data with third parties who perform business 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.

Other reasons we may share what we know about you include:

- enforcing our agreement with you;
- protecting the rights, property, or safety of MetLife, our customers, or others;
- doing what a court, regulator or government agency 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; and
- giving personal data to the government so that it can decide whether you may get benefits that it will have to pay for.

### **How we treat personal data on a business sale**

From time to time, we may sell one or more of our businesses or product/service lines to another provider, and your personal data may be transferred as a part of that purchase or sale. Any new provider will continue to use your personal data for the same purposes unless you are notified otherwise. We may also share your personal data with prospective purchasers of our business and their professional advisers, but will ensure that appropriate safeguards are in place to protect your information in such circumstances.

### **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 unauthorized 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.

### Direct marketing

We offer you the opportunity to receive marketing from us in relation to products, special offers or services that we believe may be of interest to you. We will normally send direct marketing by email if we have your email address, but may choose to contact you via other methods, if you have provided your consent for us to market to you using these methods.

If you would like us to stop marketing to you, we offer simple ways to do this. Whenever you receive direct marketing you will be told how you can unsubscribe. You can also select the 'unsubscribe' option on any email marketing communications we send to you to tell us to stop sending marketing communications to you.

You can also tell us that you do not wish to receive any more at any time by writing, with your full name, address and other contact details to: [cymarketing@metlife.com](mailto:cymarketing@metlife.com)

### 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 as the Republic of Cyprus does. 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 mechanisms. Companies outside the European Economic Area with whom we may share your personal data include our other group companies, IT providers and other suppliers.

### How long will we keep your information?

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 all the different types of data we hold and are reviewed on a regular basis.

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 prominently post notice of the changes on our website.

### Governing law

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

### 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, 2<sup>nd</sup> floor, 1082 Nicosia; tel: 22818456; fax: 22304565; email: [commissionerdataprotection.gov.cy](mailto:commissionerdataprotection.gov.cy) or on its website at [www.dataprotection.gov.cy](http://www.dataprotection.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 contact us at MetLife, 38 Kennedy Avenue, Nicosia, 1087, Cyprus or at [ccd@metlife.com](mailto:ccd@metlife.com).

## 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](#)

[Automated decision making and profiling](#)

## 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 information; 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.

### 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 above 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;
- 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.

### **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 defense of legal claims.

More importantly, if we have to erase your data we will not be able to provide you with insurance or our other products and services 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”](#), 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.

## **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:

#### **(a) 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.

#### **(b) Direct marketing**

You can object at any time to your personal data being used for direct marketing purposes (including profiling related to such direct marketing).

If you sign up to receive newsletters or other e-mail messages from us, you can opt-out at any time free of charge by clicking the unsubscribe link at the bottom of the message. You may also choose to opt-out from receiving marketing materials from us by contacting us using the details in our Privacy Notice under the section headed '[How to get more help](#)'.

### **Automated decision making and profiling**

Currently MetLife does not use any technology for automated decision making and profiling. If MetLife in the future adopts such technology, you will be notified and this Privacy Notice will be updated accordingly.

## GLOSSARY

**Automated decision making** refers to decisions reached by computer analytics including **profiling**, without any review or checks by any human, based on whether or not the information provided matches pre-defined acceptance criteria.

the **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.

**Credit Reference Agencies** are companies which collect personal data relating to the credit ratings of individuals and make it available to organisations such as insurers and banks.

**Fraud Prevention Agencies** collect, maintain and share, personal data internationally on known and suspected fraudulent activity.

**Insurance Brokers** find insurers who are prepared to provide insurance cover to match a customer's requirements.

**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.

**Profiling** means any form of automated processing of personal data where personal data is used to analyse or predict certain personal aspects e.g. an individual's economic situation, health, personal preferences, interests, reliability or behavior.

**Reinsurers** provide insurance to insurance companies to enable them to manage their risk.

**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.