

Privacy Notice

Republic of Ireland



Privacy Notice

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.

This Privacy notice applies to products and services issued in or administered in the Republic of Ireland.

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, MetLife, 20 on Hatch, Lower Hatch Street, Dublin 2, Ireland

e-mail: eu-dpo@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 the way we handle your information, you have a right to complain to the Office of the Data Protection Commission at 12 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland. Web www.dataprotection.ie, email: info@dataprotection.ie.

We kindly request that you attempt to resolve any issues directly with us before reaching out to the Data Protection Commissioner's office.

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 your rights and how we use your personal data. This is why we are providing you with details about your information in this Privacy Notice.
2. The right of access	You have the right to obtain access to your personal data (if we are processing it), and certain information about you (as provided in this Privacy Notice). This is so you are aware and can check that we're using your personal data in accordance with data protection law. For more information, see 'Accessing your information'.
3. The right to rectification	You are entitled to have your personal data corrected if it's inaccurate or incomplete. For more information, see 'Correcting your information'.

Rights	What does this mean?
4. The right to erasure	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 your information, such as where we are under a legal obligation to do so or have another valid legal reason to retain it. For more information, see ‘Erasing your information’.
5. The right to restrict processing	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. This may affect our ability to provide services to you. For more information, see ‘Restricting processing of your information’.
6. The right to data portability	You have the right to obtain a copy of some of the information that we hold on you and reuse or share it for your own purposes. For more information, see ‘Taking your personal data with you’.
7. The right to object	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 ‘Objecting to processing’.
8. Automated decision making	For automated decisions you have the right to: • Obtain an explanation for the decision, express your views, and challenge it. • Request for the decision to be reviewed by a human.

Who we are

The following companies are referred to as “**MetLife**” in this Privacy Notice:

- MetLife Europe, d.a.c., a private company limited by shares, registered in Ireland under company number 415123. Registered office at 20 on Hatch, Lower Hatch Street.
- MetLife Europe Services Limited, a private company limited by shares, registered in Ireland under company number 472359. Registered office at 20 on Hatch, Lower Hatch Street.

MetLife is 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, instant messaging or other electronic means, including online portals where provided.

We record all telephone calls and other electronic communications 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 address, email details and phone numbers;
- policy number;
- financial personal data including account details for direct debits;
- national insurance number;
- age or date of birth;
- gender, occupation;
- recreational activities or sports;
- details of any criminal convictions;
- details on potential vulnerabilities that may affect you such as your health, capability / capacity, financial circumstances and life events; and
- special categories of personal data (see 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 (or where your employer first contacts us if we provide group insurance to your employer) and whilst we continue to provide insurance to you or your employer. You may 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, or apply for, one of our insurance products or services;
- register to access your financial account information;
- ask to have a MetLife representative 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 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; and
- sponsors who provide us with marketing lists which include your personal data where you have explicitly consented to this use.

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 (particularly if you are a minor), 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.

We may also need to share limited medical information (but not medical reports or other medical evidence) relating to underwriting decisions with your intermediary. This could include the terms of insurance that we offer you, as well as what we will not cover (which are known as exclusions).

In some circumstances, we rely upon your consent to process special categories of personal data. Where this is the case, we will ask you for it at the relevant time. If you choose not to give your consent or do give it but withdraw at a later date, we may not be able to perform some of the tasks we need to in order to administer and provide your cover and may in some cases need to cancel your policy / end our relationship with you as a consequence.

Where we do not rely upon your consent to process any special categories of personal data, we rely upon the processing being necessary for reasons of substantial public interest in reliance upon the substantial public interest condition set out in the GDPR where processing of special categories of personal data is necessary for an insurance purpose. An insurance purpose includes arranging, underwriting or administering an insurance contract, administering a claim under an insurance contract or exercising a right or complying with an obligation arising in connection with an insurance contract.

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 we provide insurance cover to you or your employer ;
- 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;
- ensure that content from our website is presented in the most effective manner for you;
- aggregate it on an anonymous basis with other data for data analytical and reporting purposes; and
- provide you with access to secure areas of our website.

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 such data.

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

Where you use our website, we process your personal data collected by using cookies in accordance with our cookie policy. A copy of our cookie policy can be found on our website.

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 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 and any third parties engaged by us to help us provide insurance products and services to you (please also see 'How we disclose your personal data');
- communications purposes;
- marketing analytics and feedback to enable us to optimise 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);
- 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 but only in an anonymised form 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 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.

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 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.

Depending upon the product you have with us, we may share your personal data with 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, financial services providers and claims investigation firms to prevent and detect fraudulent and exaggerated claims;

- with third party administrators and service providers to assist us in the administration of your insurance policy or any claim you may make under it;
- with companies that provide value-added services in connection with 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 your financial advisor(s) so that they can advise and provide their services to you;
- 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 health professionals including doctors and medical centres where we are providing health insurance to you; and
- If your employer holds a Group Income Protection Policy with us and you make a claim, we may share your personal data (including data concerning your health) with your employer in connection with your claim and its progress.

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 ensure that appropriate safeguards are in place to protect your personal data 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 unauthorised access and improper use;
- secure our IT systems and safeguard information; and
- ensure we can restore your information in situations where the information 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.

Direct marketing

We may 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 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 are told how you can unsubscribe. You can also select the 'unsubscribe' option on any email marketing communications we send to you.

Automated decision making

We may use automated decision-making processes to make decisions about you, including profiling, to provide quotations for insurance products and managing and administering these products effectively. These automated processes may be used to generate quotations, assessing applications (including underwriting decisions) and issue insurance policies, claims handling, prevention and detection of fraud and financial crime, and implementing targeted marketing initiatives.

When we make an automated decision using personal data that has a legal or substantially similar effect, you have certain rights regarding that decision. Specifically, you have the right to receive meaningful information about the logic involved in the decision, the right to human intervention, the right to obtain an explanation of the decision made and to challenge it.

For more information about these rights and how to exercise them, please see 'Your Privacy Rights' below.

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 Ireland does. Where we transfer personal data or share it with others outside the European Economic Area, we 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, UK branches, IT providers and other suppliers necessary for the performance of the insurance contract.

How long will we keep your information?

We will typically need to retain your information throughout the duration of our relationship with you, and potentially beyond that point to comply with all applicable laws and privacy legislation to which we are subject. Further details can be provided upon written request.

We safely and securely destroy data which we no longer need to keep in accordance with our data retention 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.

Governing law

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

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 Data Protection Commission at 6 Pembroke Row, Dublin 2 DO2 X963 or at their website www.dataprotection.ie. Tel: (01) 765 0100 or 1800 437 737.

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.

To exercise any of the rights described, please contact us at EUDPO@MetLife.com.

What can you request access to?

You have the right to:

- receive confirmation from us that your information 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 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 information you request. We will conduct a reasonable and proportionate search for your information.

When will access not be provided?

We can only provide you with your information, 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, there are some records we are not able to share in connection with a claim or legal proceeding.

Please clearly set out in your access request the information 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 'Obtaining further personal data from us'.

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 will 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 Information

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

Due to legal privilege, there may be some records we are not able to share 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 we do not have a legitimate interest in processing your personal data;
- 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 personal data is processed for certain specified reasons, including for the exercise or defence of legal claims.

More importantly, if we have to erase your personal data we are not 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 will 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 personal data, we need to restrict the processing until we have verified the accuracy of the personal data;

- 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 have objected to the processing in the circumstances detailed in paragraph (a) of “Objecting to processing”, and we are considering whether those interests should take priority.

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

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

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

We will 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 in the following circumstances where personal data has been provided to us in connection to the performance of a contract of insurance:

- to personal data you've provided to us;
- 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 adversely affect that person's rights.

Objecting to processing

You can object to processing in the following circumstances:

(a) Legitimate interests

You have 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 'Obtaining further personal data from us'. If you have access to the 'MyMetLife' portal you can also change your preferences in your portal.

Automated Decision Making

Where a decision has been made using an automated decision, you have the right to:

- receive information about the decision
- to make representations about and to challenge the decision
- to obtain human intervention about the decision; and
- to contest the decision.

Significant automated decisions based entirely or partly on processing any special categories of personal data may only be carried out if one of the following conditions are met:

- you have provided your explicit consent, or
- the decision is necessary for entering into, or performing, a contract between the data subject and a controller, or,
- the decision is required or authorised by law.

Glossary

Automated Decision Making is a decision based solely on automated processing if there is no meaningful human involvement in the taking of the decision.

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.

GDPR means the General Data Protection Regulation (EU) 2016/679 and the Data Protection Acts 1988-2018.

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 behaviour.

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.

Sponsors are third parties who provide us with lists of names and contact details for marketing purposes.

Products and services are offered by MetLife Europe d.a.c. which is an affiliate of MetLife, Inc. and operates under the "MetLife" brand.

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