

CUSTOMER REGISTER DESCRIPTION OF GYVYBĖS DRAUDIMO UAB “SB DRAUDIMAS” LATVIAN AND ESTONIAN BRANCHES

1. Data controller

Gyvybės draudimo UAB “SB draudimas” (Registration code 110081788)
Gynėjų 14 , 01109 Vilnius, Lithuania

2. Contact information for the data protection officer

Gyvybės draudimo UAB “SB draudimas”, including its’ branches in Latvia and Estonia, data protection officer’s contact is following:

Data Protection Officer
Gyvybės draudimo UAB “SB draudimas”
Gynėjų 14 , 01109 Vilnius, Lithuania
dapsauga@sb.lt

You can also contact Gyvybės draudimo UAB “SB draudimas” customer service in each country with regard to data protection issues.

Gyvybės draudimo UAB “SB draudimas” Estonian branch, Customer Service
Keemia 4, 10616Tallinn, Estonia, +372 681 2300
info@sbinsurance.ee

Gyvybės draudimo UAB “SB draudimas” Latvian branch
Elizabetes iela 10B-1, LV-1010 Rīga, Latvija , +371 675 03333
info@sbinsurance.lv

Gyvybės draudimo UAB “SB draudimas”
Gynėjų 14 , 01109 Vilnius, Lithuania, 1813

3. Purpose and legal basis for the processing of personal data

The purpose of processing personal data is managing Gyvybės draudimo UAB “SB draudimas” Latvian and Estonian branches insurance operations, including development and administration of services and products. To fulfil our statutory obligations, we process personal data e.g., on the basis of legislation related to the knowledge of a customer and the insurance company’s risk management. We also process personal data due to enquiry, reporting and storage obligations based on legal regulations. Personal data is also processed for statistical purposes.

The legal basis for the processing of personal data is the fulfilment of the legal obligation of Gyvybės draudimo UAB “SB draudimas” Latvian and Estonian branches, the implementation of the agreement between Gyvybės draudimo UAB “SB draudimas” Latvian and Estonian branches and the customer and the fulfilment of the legitimate interests of Gyvybės draudimo UAB “SB draudimas” Latvian and Estonian branches (for example, developing products to customers) and in certain cases – consent given by customers.

4. Categories of data subjects

- Insurance customers (insured persons, policyholders and beneficiaries), their representatives and payers of insurance premiums
- Former customers
- Persons related to corporate customers
- Persons regarding whom the processing of personal data is related to the statutory obligation set for the register owner (for example, beneficial owners, customers-politically exposed persons and persons related to them)

5. Disclosure of data

We may disclose personal data to relevant parties as required or allowed by applicable laws and regulations, including but not limited to:

- Authorities
 - Personal data may be disclosed to authorities, for example, the tax authorities and law enforcement authorities, when required by law.
- Other insurance companies
 - Personal data may be disclosed to another insurance company in reinsurance situations.
- The Estonian insurance companies high risk persons register (relevant only for Gyvybės draudimo UAB "SB draudimas" Estonian branch)
 - When the insurance application is being processed, the customer's data might be checked on the basis of personal data in the high risk persons register.
- Companies belonging to the same companies group
 - Data may be disclosed to the other Šiaulių bankas Group companies.

If we decide to sell, buy, merge or otherwise reorganize our businesses, this may involve us disclosing and/or transferring personal data to prospective or actual buyers and their advisers, or receiving personal data from sellers and their advisers.

6. Transfer of personal data outside the European Union or the European Economic Area

We primarily process data within the EU and the EEA. If data is transferred outside the EU and the EEA (for example, in such a way that the data is processed or stored on servers located in these countries) to countries for which the European Commission has not issued a decision of adequacy of data protection, we will take care of the data protection, for example, by utilising standard contractual clauses approved by the European Commission. Sensitive data is not transferred outside the EU and the EEA. Transferred data is processed only on behalf of Gyvybės draudimo UAB "SB draudimas" Latvian and Estonian branches.

7. Retention period for personal data

The customer's data is stored for 10 years after the end of the most recent contract or payment of the most recent out payment. Data related to the know your customer obligations (money laundering, terrorist and proliferation financing prevention) is stored for 5 years in Estonia and 5 years in Latvia.

Data related to taxation and reporting obligations (incl. obligations resulting from international FATCA/CRS agreements) are stored for 10 years after the end of each tax year.

Data of persons who have received an insurance quote is retained up to 5 years after the quote was made if the quote did not lead to a contract.

After expiration of the time limits indicated in this Section, the destruction of the personal data is performed in time according to Gyvybės draudimo UAB “SB draudimas” Latvian and Estonian branches internal personal data retention rules.

8. Categories of personal data

We process personal data only to the extent necessary and as required by law. The data we process depends on what person or customer group you belong to.

- Customer data
 - For example, name, date of birth, identification number, contact information, language, nationality, information of power of attorney and guardianship information, health data (only on your given consent basis).
- Customer’s contract data
 - For example, contract type and category, customer’s status in policy (insured person, policyholder or beneficiary), financial data, insurance premiums, insurance savings, sensitive data, contract validity, start and end date, information on the quote the contract was based on, health reports (only in your given consent basis), potential constraints and beneficiary provisions.
- Data related to insurance premiums
 - For example, payments made, open invoices and debt collection data.
- Data related to life insurance
 - For example, insurance needs assessments, tax data, medical examinations and reports (only on your given consent basis), as well as professional and hobby data that have an effect on risk.
- Data related to unit-linked insurance
 - In addition to the above, for example, investment type and category, fund data, investment plan.
- Communication
 - For example, marketing authorisations and opt-out, information from the contact channel, information on meetings and telephone data
- Telephone records
 - Records from customer service
- Data required by specific legislation
 - For example, data processed and stored under the legislation related to the prevention of money laundering.
- Links to customers
 - For example, information on representing a company or organisation, information on being a corporate or institutional customer.

9. Rights of the data subjects

You have the right to access your personal data processed by Gyvybės draudimo UAB “SB draudimas” Latvian and Estonian branches, the right to correct the data and, when the conditions are fulfilled, the right to delete the data, the right to limit or resist the processing of the personal data, as well as the right to transfer the data elsewhere, if it is possible.

To learn more about your rights and how to use them, please see Gyvybės draudimo UAB “SB draudimas” Latvian and Estonian branches [Privacy policy](#).