

# PRIVACY NOTICE

## GIBRALTAR

Utmost Wealth Solutions is the brand name used by a number of Utmost companies. This item has been issued by Utmost Luxembourg S.A.

Words in the singular include the plural and vice versa. A reference to one gender includes a reference to the other gender.

Policy Number

### PRIVACY NOTICE

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### INTRODUCTION

Utmost Luxembourg S.A. ("we", "us", "Insurer"), a Luxembourg life assurance company established as a public limited liability company (société anonyme), registered office at 4, rue Lou Hemmer, L-1748 Luxembourg, Grand-Duché de Luxembourg, and registered with the Luxembourg Trade and Companies Register under number B37604 is acting as data controller in accordance with Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "General Data Protection Regulation" or "GDPR").

This Privacy Notice provides information about how we collect and use personal data and explains your statutory rights.

### WHAT PERSONAL DATA DO WE COLLECT?

In order to provide you with our products and services, we collect information relating to you and related parties. This may include:

- › Authentication data such as online identifier, username, login ID, password
- › Contact data such as correspondence address, email and phone numbers
- › Financial data such as source and details of wealth, transactions data, insurance premiums
- › Identification data issued by public authorities such as social security number, ID or passport and tax identification number
- › Identification data such as name, surname, residential address, date and place of birth, nationality, (electronic) signature specimen and unique identifiers
- › Images and sound recording data in case of digital onboarding
- › Personal characteristics such as age, gender, marital status, language, relationship with the Policyholder
- › Personal data relevant to the assessment of risk such as past criminal offences and convictions
- › Physical data such as weight and data related to health and lifestyle in case of a potential death cover
- › Professional data related to past and current activity and occupation
- › Your sustainability preferences

### HOW DO WE COLLECT PERSONAL DATA?

We will collect information from you directly when you apply for a product or service.

Information about you may also be provided to us by a third party, such as an agent or broker or any other third person who may be applying for a product or service which names or benefits you.

We may collect information about you from other sources where we believe this is necessary to manage your Policy and the risk associated with it and/or to help fight financial crime. These other sources may include public registers, databases managed by reputable organisations as well as the press and the Internet.

When you provide personal data to Utmost Luxembourg S.A. relating to a third party, for example details of family members, you confirm that you have the authority to disclose the personal data and that the data disclosed is complete, accurate and up to date.

Provision of personal data is a contractual requirement and a requirement necessary to enter into the Policy. Any change to the personal data must be notified to us promptly. Refusal to provide information, providing inaccurate information or not providing updated information may affect the performance of our obligations.

#### FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

We use your personal data for the following purposes:

PURPOSE OF PROCESSING	PERSONAL DATA TYPE	LEGAL BASIS FOR PROCESSING
<p>Entering and performance of the policy:</p> <ul style="list-style-type: none"> <li>› Preparing, setting up, administering, issuing, concluding and performing the policy, including in relation to the investments, and settling sums due under the terms of the policy</li> <li>› General management of customers</li> <li>› Intermediation and reinsurance</li> </ul>	<ul style="list-style-type: none"> <li>› Contact data</li> <li>› Financial data</li> <li>› Identification data</li> <li>› Images and sound recordings</li> <li>› Personal characteristics</li> <li>› Personal data relevant to the assessment of risk</li> <li>› Physical, health and lifestyle related data</li> <li>› Professional data</li> <li>› Sustainability preferences</li> </ul>	<ul style="list-style-type: none"> <li>› Performance of a contract (Art. 6 para.1 b GDPR)</li> <li>› Consent (Art. 6 para.1 a GDPR)</li> </ul>
<p>Compliance with legal and regulatory obligations:</p> <ul style="list-style-type: none"> <li>› Cooperating with local and foreign tax authorities</li> <li>› Preventing fraud, money laundering and terrorist financing</li> </ul>	<ul style="list-style-type: none"> <li>› Contact data</li> <li>› Financial data</li> <li>› Identification data</li> <li>› Images and sound recordings</li> <li>› Personal characteristics</li> <li>› Personal data relevant to the assessment of risk</li> <li>› Professional data</li> </ul>	<p>Legal obligation (Art. 6 para 1 c GDPR)</p>
<p>Corporate restructuring, including mergers and acquisitions involving the Insurer</p>	<ul style="list-style-type: none"> <li>› Contact data</li> <li>› Financial data</li> <li>› Identification data</li> <li>› Images and sound recordings</li> <li>› Personal characteristics</li> <li>› Personal data relevant to the assessment of risk</li> <li>› Physical, health and lifestyle related data</li> <li>› Professional data</li> </ul>	<p>Legitimate interest (Art. 6 para.1 f GDPR), provided it is conducted at all times in a way that is proportionate and that respects your privacy rights</p>
<p>Management of complaints and litigation</p>	<ul style="list-style-type: none"> <li>› Contact data</li> <li>› Financial data</li> <li>› Identification data</li> <li>› Images and sound recordings</li> <li>› Personal characteristics</li> <li>› Personal data relevant to the assessment of risk</li> <li>› Physical, health and lifestyle related data</li> <li>› Professional data</li> </ul>	<p>Legitimate interest (Art. 6 para.1 f GDPR), Controller's right of defence</p>

PURPOSE OF PROCESSING	PERSONAL DATA TYPE	LEGAL BASIS FOR PROCESSING
Operational effectiveness: › Electronic signatures › Distance selling › Connect platform › Delivery of electronic mail	› Authentication data › Contact data › Financial data › Identification data › Images and sound recordings	› Consent (Art.6 para.1 a GDPR) › Legitimate interest (Art. 6 para.1 f GDPR), provided it is conducted at all times in a way that is proportionate and that respects your privacy rights
Risk management: › Determination of risk profile › Detection of fraudulent activity on policies › Identification and monitoring of risk exposures	› Contact data › Financial data › Identification data › Images and sound recordings › Personal characteristics › Personal data relevant to the assessment of risk › Professional data	› Legal obligation (Art. 6 para 1 c GDPR) › Legitimate interest (Art. 6 para.1 f GDPR), provided it is conducted at all times in a way that is proportionate and that respects your privacy rights

We may ask for your written consent before processing personal data for a purpose other than those listed above or to offer you real choice and control over your personal data. If you have given your consent for the processing of your personal data for a specific purpose, you have the right to withdraw this consent at any time, without affecting the lawfulness of the processing based on consent before withdrawal.

We will not use your personal data for direct marketing purposes.

#### WHO HAS ACCESS TO YOUR PERSONAL DATA?

Your personal data is available on a need to know basis within Utmost Luxembourg S.A., and can only be accessed by the employees of the relevant internal departments to the extent necessary to fulfil their respective tasks and responsibilities. Our employees process your personal data in accordance with our policies and procedures to ensure an adequate level of security.

We may make your personal data available by any means to third parties that may require access to them, including the Intermediary, the Investment manager and the Custodian bank appointed on your Policy, service providers, legal advisers, auditors, delegates, any other subsidiary or affiliated company that is part of the group of companies of each of the Insurer and the other recipients of the personal data, public administrations and local or foreign public and judicial authorities, including any competent regulator.

We use service providers, notably located in the United Kingdom and the United States of America, to comply with anti-money laundering and KYC obligations and may provide certain information and personal data of the Policyholder, the Life Assured and/or the Beneficiary to them.

#### DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA "EEA"?

Processing of personal data may include transfers outside the EEA, to countries that may not have data protection requirements deemed equivalent to those prevailing in the EEA. In such cases, we will strictly comply with article 46 of the GDPR and provide appropriate safeguards through contractual clauses between the Insurer and the recipient located in the third country or ask for your consent. You may contact our Data Protection Officer ("DPO") for more information about the applied safeguards.

#### HOW CAN YOU EXERCISE YOUR DATA PROTECTION RIGHTS?

You have a number of rights in relation to your personal data.

**Your right of access:** You have the right to ask us for copies of your personal data.

**Your right to rectification:** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. We may seek to verify the accuracy of the data before rectifying it.

**Your right to erasure:** You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing:** You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing:** You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability:** You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You also have a right to request information in relation to any automated decision making and profiling or the basis for international transfers.

You can submit your written request to our Data Protection Officer "DPO" via the following email address: [data.privacy@utmostgroup.lu](mailto:data.privacy@utmostgroup.lu) and/or by post mail at Utmost Luxembourg S.A., 4, rue Lou Hemmer, L-1748 Luxembourg, Grand-Duché de Luxembourg.

We will respond without delay and within one month of receipt of your request.

We will not ask for a fee to exercise any of your rights in relation to your personal data, unless your request for access to information is unfounded, repetitive or excessive, in which case we may charge a reasonable amount in the circumstances. We will let you know of any charges before completing your request.

Finally, you have a right to lodge a complaint with Luxembourg's National Commission for Data Protection (CNPD) by completing the online form available on the CNPD's website <https://cnpd.public.lu/en/particuliers/faire-valoir.html> or with the respective supervisory authority in your country of habitual residence, place of work or with the competent supervisory authority of the country in which an alleged data protection infringement occurred.

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#### HOW DO WE SECURE YOUR PERSONAL DATA?

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Protecting your privacy is very important to us.

Utmost Luxembourg S.A. has taken adequate safeguards to ensure the confidentiality and security of your personal data by implementing appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, and against all other forms of unlawful processing or further processing.

Utmost Luxembourg S.A. is ISO 27001 and ISO 27701 certified.

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#### HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

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We will process your personal data during the life of the Policy to achieve the purposes described above and after its termination to comply with legal obligations applicable to insurance undertakings.

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#### DO WE USE AUTOMATED DECISION MAKING?

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The personal data collected may be processed partially through automated means but only when the decision is necessary to enter into or for the performance of the Policy, and notably for the performance of the legal duties of the Insurer (such as, but not limited to, anti-money laundering obligations).

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#### WHO CAN YOU CONTACT?

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If you have any questions related to your personal data or have concerns regarding the way in which we process your personal data, please contact our Data protection Officer at [data.privacy@utmostgroup.lu](mailto:data.privacy@utmostgroup.lu) and/or by post at Utmost Luxembourg S.A., 4, rue Lou Hemmer, L-1748 Luxembourg, Grand-Duché de Luxembourg.

Last updated on 01/11/2025

#### SIGNATURE

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Place

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Place

A WEALTH *of* DIFFERENCE

[www.utmostinternational.com](http://www.utmostinternational.com)

Utmost Luxembourg S.A. is registered with R.C.S. under number B37604 and regulated by the Commissariat aux Assurances (CAA)  
Registered office address: 4, rue Lou Hemmer, L-1748 Luxembourg, Grand-Duché de Luxembourg  
Utmost Wealth Solutions is registered in Luxembourg as a business name of Utmost Luxembourg S.A.