

# PRIVACY NOTICE

## ASIA

Utmost Wealth Solutions is the brand name used by a number of Utmost companies. This item has been issued by Utmost PCC Limited.

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

### PRIVACY NOTICE

#### INTRODUCTION

Utmost PCC Limited ("we", "us", "Insurer"), established as a protected cell company and licensed to conduct insurance business by the Guernsey Financial Services Commission and having its registered office at Utmost House, Le Truchot, St Peter Port, Guernsey GY1 1GR, processes your data in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017 (the "DPGL").

This Privacy Notice provides information about how we collect and use your 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:

- › 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 and (electronic) signature specimen
- › 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 convictions
- › Physical data such as weight and data related to health and lifestyle in case of a potential death cover
- › Professional data related to activity and occupation

#### 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 party 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 PCC Limited 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
Entering and Performance of the Policy	› Contact data	Performance of a contract
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	› Financial data	Consent
Intermediation and reinsurance	› Identification data	
	› Personal characteristics	
	› Personal data relevant to the assessment of risk	
	› Physical, health and lifestyle related data	
	› Professional data	
Compliance with legal and regulatory obligations	› Contact data	Legal obligation
Cooperating with local and foreign tax authorities	› Financial data	
Preventing fraud, money laundering and terrorist financing	› Identification data	
	› Personal characteristics	
	› Personal data relevant to the assessment of risk	
	› Professional data	
Management of complaints and litigation	› Contact data	Legal obligation
Risk management	› Financial data	
Effective and lawful operation of the Insurer's business	› Identification data	
	› Personal characteristics	Legitimate interest - provided it is conducted at all times in a way that is proportionate and that respects your privacy rights
	› Personal data relevant to the assessment of risk	
	› Professional data	

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 PCC Limited, 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 TO UNAUTHORISED JURISDICTIONS?

Processing of personal data may include transfers to unauthorised jurisdictions that may not have data protection requirements deemed equivalent to those prevailing in the Bailiwick of Guernsey. In such cases, we implement appropriate safeguards through EU Model Clauses (or equivalent provisions as may from time to time be in force) between us and the recipient of your data located in the unauthorised jurisdiction or ask for your consent. You may contact us for more information about the applied safeguards.

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## HOW CAN YOU EXERCISE YOUR DATA PROTECTION RIGHTS?

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

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

**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.

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

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

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

**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.

**Right not to be subject to decisions based on automated processing:** You have the right not to be subjected to automated decision making without human intervention.

You can submit your written request to us via the following email address: [upcc@utmostgroup.com](mailto:upcc@utmostgroup.com) and/or by post to Utmost PCC Limited, Utmost House, Le Truchot, St Peter Port, Guernsey GY1 1GR.

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.

You may make a complaint in writing to the supervisory authority (the Office of the Data Protection Commissioner - <https://www.odpa.gg/for-individuals/make-a-complaint/>) if you consider that the Insurer has breached, or is likely to breach, an operative provision of the data protection law, and the breach affects or is likely to affect any personal data relating to you or any of your data subject rights (as listed above).

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## HOW DO WE SECURE YOUR PERSONAL DATA?

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Protecting your privacy is very important to us.

Utmost PCC Limited 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.

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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 us at [upcc@utmostgroup.com](mailto:upcc@utmostgroup.com) and/or by post at Utmost PCC Limited, Utmost House, Le Truchot, St Peter Port, Guernsey GY1 1GR.

## A WEALTH *of* DIFFERENCE

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

Utmost PCC Limited (No. 37269) also trading as Utmost Wealth Solutions, is incorporated in Guernsey. It is authorised and regulated by the Guernsey Financial Services Commission to conduct long term business

Registered office address: Utmost House, Le Truchot, St Peter Port, Guernsey GY1 1GR