

Register Description: The Customer Register of Mandatum Life

Data Controller

Each company (later referred to as Mandatum Life) acts as the data controller for its customers.

Mandatum Life Insurance Company (Business ID 0641130-2)
Mandatum Life Investment Services Ltd (Business ID 2608438-8)

Bulevardi 56
FI-00120 Helsinki
Finland

Contact Information

If you have questions about data protection, we ask that you primarily contact [the customer service of Mandatum Life](#). You can reach the data protection officer of Mandatum Life at dpo@mandatumlife.fi.

The Purposes and the Legal Grounds for the Processing of Personal Data

Mandatum Life processes personal data for the purposes of managing customer relationships and offering, selling, marketing, administering and developing services and products. We process personal data also to fulfil our legal and regulatory obligations and for statistical purposes. We record phone calls between Mandatum Life and the customers to verify orders, to ensure the quality of the customer service and to fulfil legal obligations set in the Investment Services Act.

The legal grounds for the processing of personal data are the compliance with legal obligations of Mandatum Life, the performance of a contract (for example an insurance contract, custodial contract, management contract, brokering contract or a power of attorney) between Mandatum Life and the customer and pursuing the legitimate interests of Mandatum Life (for example regarding the customer satisfaction surveys, service and product development and marketing to potential customers).

Categories of Data Subjects

- Insurance customers, investment service customers and trading customers
- Former customers
- Persons associated with corporate customers
- Persons whose personal data is processed due to a legal obligation of Mandatum Life (for example beneficial owners and family members of customers who are politically exposed persons)



Categories of Personal Data

The categories of data we process depend on what group of persons or customers you belong to.

- Basic information
 - Name, ID number, contact details, language, nationality, memberships that qualify for benefits, information about guardianship, information on knowing the customer
- Customer and contract information
 - Insurance customers: insurance type, contract type, role in the contract (insured, policyholder or beneficiary), insurance payments and insurance-based savings
 - Investment service customers: order and trade information, amount and type of securities and other information required by law
 - Trading customers: trading information and taxation information
- Connections to other customers, responses to customer satisfaction surveys
- Communication information
 - Online messages, marketing permissions, information about the preferred channel of communication, information about meetings and phone calls, call recordings
- Information required by special legislation
- Web service activities and events

Disclosure of Personal Data

We disclose personal data to authorities and to other recipients specified in the Insurance Companies Act and the Act on Investment Services, generally to the following:

- Authorities
 - When required by law, personal data is disclosed to the authorities, including the Tax Administration, the Social Security Institution and the enforcement authorities
- Reinsurance companies
 - Personal data is disclosed to other insurance companies for reinsurance purposes
- Joint claims and abuse registers of insurance companies
 - When processing insurance applications, we use personal data when checking the joint abuse register for the customer's information
 - Information about the insurance claims is disclosed to the joint claims register
- Companies that belong to the same group or conglomerate referred to in the Act on the Supervision of Financial and Insurance Conglomerates
- Partners

Data Transfers Outside the EU/EEA

Personal data is mainly stored and processed within the EU and the EEA. If data is transferred outside the EU or the EEA to countries for which the European Commission has not issued a decision of adequacy of data protection, we will take care of protecting the data for example by using standard contractual clauses approved by the European Commission. Transferred data is processed only on behalf of Mandatum Life.



Retention Periods of Personal Data

Generally, customer data is stored for the duration of the customer relationship and 13 years after the last contract with the customer has ended or after the last claim has been paid. Information regarding the obligation to know our customers is stored for 5 years after the last contract with the customer has ended. Call recordings are stored for 10 years if the calls are related to managing contracts and for 2 years if the calls are related to marketing campaigns. Event logs of the web service are stored for 2 years. Data from customer satisfaction surveys is stored for 5 years. Information related to taxation, accounting and reporting obligations (including the obligations stemming from international FATCA/CRS agreements) is stored for 6 years after each fiscal year.

Profiling

Profiling refers to automatic processing of personal data which includes for example evaluating or predicting the interests or the behaviour of a person. We use profiling to offer our customers more tailored and individual customer service and more suitable products and services. We also use profiling to fulfil our legal and regulatory obligations regarding knowing our customers and assessing the risk-taking capability and investment knowledge of our customers. Profiling is based on data from the customer relationship, contracts (for example data about the products and services chosen by the customer), our partners and public registries as well as data about the interests provided by the customer. Profiling includes no automated decision-making.

Rights of the Data Subject

You have the right to access your personal data processed by Mandatum Life, the right to rectification, the right to lodge a complaint with the data protection authorities and depending on the conditions, the right to erasure, the right to the restriction of processing, the right to object to the processing and the right to data portability. You can read more about your rights and about how to use them in [the privacy policy of Mandatum Life](#).

Last updated on September 20, 2019.

