



PERSONAL DATA PROCESSING POLICY

Contents

1. About Us	2
2. Personal Data Processing Principles	4
3. How we Collect your Personal Data	5
4. What kinds of Personal Data are Processed by us	6
5. How we use your Personal Data.....	7
7. Retention Period for your Personal Data	9
8. What are your rights?.....	10
9. Changes to our Policy	12

1. About Us

The Superintendent of Insurance is the competent authority of the insurance sector in the Republic of Cyprus and exercises all the powers granted to him by the Insurance and Reinsurance Services and Other Related Issues Law of 2016 [Law 38(I) 2016] and by the relevant Regulations, as amended at times, for the purpose of protecting the counterparties and the insurance beneficiaries. The said legislation regulates the issues relating to the undertaking, pursuit and supervision of the distribution of insurance and reinsurance services and the undertaking, and supervision of the distribution of insurance and reinsurance products in the Republic. The Superintendent of Insurance is the head of the Insurance Companies Control Service (the “**ICCS**”) which at all times acts on behalf of and by the order of the Superintendent of Insurance. The offices of the ICCS are located at 29 Vyronos Avenue, 1096, Nicosia.

This text aims at providing you with intelligible, transparent and direct information in regards to the processing of your personal data which are collected and processed in the context of fulfilling our obligations to you, since ICCS is bound by the applicable legislation to secure and safeguard your right to protection against the illegal processing of personal data and your right to privacy, as well as to protect the personal data that ICCS maintains and are of concern to you.

In the context of controlling and regulating insurance and reinsurance operations and undertaking, exercising and supervising the distribution of insurance and reinsurance products, ICCS, among other things, maintains Records and Registers which show details of companies and individuals it supervises.

Most of the information in the Registers concern the supervised companies, their activities other personal data regarding their registered address, their employees and their associates and other related issues that should be examined by the ICCS. In addition, personal data of natural persons are kept which fall under the supervision of the ICCS or cooperate with ICCS.

Your personal information may help us to better proceed to the exercise of our statutory obligations as well as to the provision of services. However, we understand that maintaining the security and confidentiality of your personal data is a big responsibility which we take very seriously. For this reason we have drawn up this Policy, among other measures, which aims at informing you about the kind of data that we collect, why we collect them and how we use them.

This Policy is addressed to natural persons, who are employees of ICCS, the supervised or potential supervised, presidents, the managing directors and the members of the Board of Directors, the senior executives, the general managers, the chief executives, the shareholders of Insurance Companies or and Companies that are under the supervision of ICCS, Insurance Intermediaries, their employees as well as third parties. By providing your personal information or the information of another person, such as a candidate for a hiring position in an Insurance Company, person for which you have consented or obtained authorization towards the processing of their personal data, you accept that we will use such information in the manner analytically explained in the current Policy. You should refer the person whose personal data you give to the ICCS, to this Policy.

Further Processing Notices may be delivered to you at a later stage underlining specific uses of your personal information.

It is also likely that certain changes will be made to this Policy in order to keep it in line with changes to the legislation as well as with operational and technological developments. You must check from time to time the website of ICCS for the latest version of the Policy.

In the Policy, your data may sometimes be referred to as “personal data”, “personal information” or “data.” For the purposes of the Policy, personal data are any information concerning a natural person, whose identity may be established whether directly or indirectly, particularly by reference to an identification detail, such as the full name, identity card number or one or more factors relating to the physical, physiological, genetic, psychological, financial, cultural or social identity of the said natural person.

The term personal data also includes, among other things, certain sensitive data (or special categories data), such as the data concerning a natural person’s state of health, any penal convictions and data revealing the racial or ethnic origin of the person.

When we say that your personal data are subject to “processing”, this term includes every action undertaken in relation to these data, such as the collection, registration, organization, structure, storage, adaptation, variation, recovery, search for information, usage, transmission, diffusion, disposal, correlation, combination, limitation, erasure and destruction.

In case you require more information on how we process your personal data, you may apply to the Data Protection Officer of ICCS at the address of its registered office, 29 Vyronos Avenue, 1096, Nicosia, or by emailing stylianos@snclaw.eu.

2. Personal Data Processing Principles

In collecting sensitive personal data we are bound by the General Regulation for the Protection of Personal Data (EU) 2016/679 and, by taking into consideration all the necessary organizational measures, we proceed to the processing stage, based on the following principles governing the processing of personal data:

- they shall be subjected to legitimate and lawful processing in a transparent manner,
- they shall be collected for specified, expressed and legitimate purposes and shall not be subjected to further processing in any way incompatible with the purposes for which these data are collected by ICCS,
- only the appropriate and relevant data shall be collected, limited to the necessary purpose for which they have been collected,
- they shall be accurate and updated as necessary,
- they shall be retained only for as long as required and for the purposes for which they have been collected,
- they shall be subjected to processing in a manner guaranteeing their required security, among other things, against unauthorized or unlawful processing and accidental loss, destruction or wear, through the use of suitable technical or organizational measures, when we transmit your personal data whether to other authorities of the Republic, another country or to a person who carries out the processing on behalf of ICCS, the necessary measures will be taken by us for the protection of your personal data.

3. How we Collect your Personal Data

Most often the collection of personal data is performed directly by you or through insurance/reinsurance companies, or through ICCS. The relevant information may be received through an application submitted to us whether directly or indirectly (via insurance/reinsurance companies) or via the provision of services of ICCS, by telephone or any other kind of communication with you.

Nevertheless, in some cases your personal data may be collected by third parties, when for example you are named by someone as a candidate to an application. Your personal details may be collected either by third parties (associates, lawyers, authorized individuals) or by other insurance companies or even by sources available to the public at large.

More analytically, personal data may be collected:

(a) Straight from you (directly or indirectly) (indicatively):

- Through the information completion form in the context of filing an application for license and/or renewal and/or modification
- In the context of submitting an inquiry or objection and filing a complaint or claim on your behalf
- In the context of submitting a complaint
- Online by the supervisor when he chooses to contact the Service
- Personal details submission forms
- By personal contact directly with the natural persons

(b) From various other/ “third” sources (indicatively):

- Through insurance/reinsurance companies that list you as a candidate to some of their applications
- Insurance contracts, in which you are named as a part of them (i.e. if you are one of the parties)
- Insurance/reinsurance companies or insurance intermediaries with which you are affiliated
- Supervisory authority of the EU or of a third country in the context of performing their duties
- Central Bank of Cyprus or by the Capital Market Commission or other authorities of the Republic, in the context of information exchange between the Supervisory Authorities or other authorities of the Republic
- Lawyers
- Closed surveillance circuit, installed in the premises of ICCS
- Through specialists and experts
- By telephone, through the Police, fax, websites, Photographs
- Through an electronic email message

4. What kinds of Personal Data are Processed by us

ICCS collects and processes various kinds of personal data, depending on the services provided in each particular case and duties it performs. This Policy applies to both those directly and indirectly involved, previous and current or potential supervised candidates.

For all of the aforementioned reasons, ICCS collects and processes personal data depending on the service and duty it shall perform, as follows (indicatively):

- Personal Information (such as full name, Date of Birth, ID copy or/and Passport copy, occupation, Social Insurance Number etc)
- Contact Details (home address, email address, telephone etc)
- Biographical details (date of birth, occupation, position etc), competence statement, penal record, financial standing, nationality, picture, , High School Diploma, Academic Qualifications, Degree or/and Post Degree certificates, seminar attendance certificates, training certificate, exam results of the Insurance Institute, address, Tax Register Number.
- Registered number of the supervised, year of registration and deletion, registration applications, modification and renewal of the license.
- Letters from insurance/reinsurance companies regarding the supervised or/and candidate.
- Application details for obtaining a relevant license from the ICCS (e.g. Register in which they apply to register, insurance companies with which they are associated, signatures of third parties, ID number), previous positions held by individuals, participation in other companies/organisations, insurance industry with which they are related/engaged etc.
- Contact details of representatives of insurance/reinsurance companies in other countries.
- Information regarding complaints, which may also include medical records
- Copy of Identity card or passport of the candidates, certificate of financial standing, penal record of other States where he resided (in the cases applicable), previous positions, CV, address in Cyprus or abroad where applicable, **nationality of the insured**, participations in insurance/reinsurance companies and other organisations.

5. How we use your Personal Data

After they have been collected, your personal data may be subjected to processing in ICCS, as previously mentioned, by its officers, in the context of the performance of their duties.

We use your personal data for the following purposes:

- For carrying out control and supervision
- To communicate with you
- In the context of an accusation or complaint
- For the performance of duties arising from our legal obligations
- To create and maintain a file of supervised individuals
- For the prevention, detection and investigation of crimes, including fraud and the legalisation of proceeds from illegal activities, as well as the appraisal and management of other trading risks.
- To conduct research and analysis of data
- For the compliance of the ICCS with the applicable laws and statutory obligations, European Union directives and guidelines, court decisions and other legal processes, and in order to respond to requests by public and state authorities, as stipulated by Cypriot and European legislation.
- To enforce and defend the legitimacy of ICCS rights or third persons

6. To whom we might share your Personal Data

It might be necessary to share your personal data with insurance/reinsurance companies or insurance/reinsurance intermediaries with whom you are affiliated as well as other supervisory authorities of the Republic or abroad and with other public authorities responsible for the financial legislation in accordance with Articles 65-71 of Law 38(I) 2016, as it may be modified from time to time. Specifically, ICCS may send your personal data to authorities indicatively, without restriction, authorities and / or bodies and / or supervisory authorities of other Member States, EIOPA, Central Bank of Cyprus, Cyprus Capital Market Commission, Supervision Authority of Professional Retirement Benefits Funds, liquidators, auditors, Registrar of Companies and Official Receiver, Public Supervisory Committee, etc.

In no case, however, are we going to share your personal data for processing for purposes contrary to those described in this Policy without your prior notification.

In each case arising from our relationship, your personal data may be transmitted to public authorities, researchers, who shall undertake to process them on behalf of ICCS in the capacity of processors, on the basis of the agreement between us. Personal data may be transmitted by the ICCS abroad to associated third providers and supervisory authorities.

In each transmission to third parties every measure shall be taken beforehand so that only the necessary data shall be transmitted for the performance of our duties and provision of services, along with the effective requirements for their legitimate and lawful processing and, the organizations to which the data are being transmitted shall undertake a written commitment that they shall on their part comply with the provisions of the General Data Protection Regulation. Exempt are those cases in which the communication of the data results from some legal or statutory obligation.

In cases where it is necessary to communicate your personal data to countries outside the European Union, which do not offer adequate guarantees for the protection of your personal data, ICCS shall be obliged and hereby undertakes the responsibility to conclude contractual clauses between ICCS and the organization to which the data are communicated, in order to safeguard the information transmitted.

7. Retention Period for your Personal Data

ICCS shall retain your personal data in its records only for the time period required for the fulfillment of its services and duties and if required by legal or statutory obligations. This also applies to those cases in which your relationship for any reason with ICCS is interrupted.

In the context of our harmonization with the Regulation in relation to the compliance with the applicable laws and regulations governing the retention and keeping of records that fall into the category of public records, periods of retention of personal data have been defined depending on the processing to which they are subjected. The parameters that have been taken into consideration for the determination of the time periods are the better execution of the duties of the ICCS, our operational needs, our legal obligations and the safeguarding of our legal interests. Furthermore, ICCS follows and complies with obligations as ascribed from The State Archives Law of 1991 (208/1991). Any data which do not fall and are not subject to the provisions of the above law, ICCS retention policy is applicable.

In order to be accurately informed on the retention periods, please contact the Data Protection Officer of the ICCS.

8. What are your rights?

The General Data Protection Regulation defines your rights in regards to your personal data. On account of this, ICCS has developed a mechanism for the satisfaction of requests concerning your personal data, as follows:

- I. **Right to access:** You have a right to access your data maintained by us and you may at any time obtain a copy thereof provided we possess them in electronic form.
- II. **Right to rectification:** You have a right to access and rectify your personal details. You may at any stage of our relationship check and update your personal data, always presenting the necessary documentation and requesting the rectification or completion of inaccurate information.
- III. **Right to be forgotten:** You have the right to ask for the erasure of the whole or part of the data that concern you. We would like to underline however that ICCS shall be obliged to erase only those personal data which can be erased as per our data erasure policy.
- IV. **Right to restriction:** You hold the right to ask for the processing of your personal data to be restricted, even when the accuracy of the data is disputed or furthermore when the data are no longer useful to ICCS but you request their retention due to legal claims.
- V. **Right to object:** You may at any time whatsoever raise objections about the processing of your personal data. In case you make use of this right, the processing shall immediately cease, unless ICCS can prove the existence of legal interest or the need to use the data in support of a legal/judicial case.
- VI. **Right to data portability:** You have the right to portability, that is, to transfer your personal data to another organization in a legible and commonly used form. The said data shall be erased as specified in the erasure policy of ICCS.
- VII. **Right to recall consent:** You have the right at any time to withdraw your consent to the processing of your personal data, without however affecting the legality on which our policy was based prior to your withdrawal. We would like to inform you that the recall of your consent may possibly lead to the termination of the relevant services.
- VIII. **Right to launch complaint:** You have the right to launch a complaint with the Commissioner for the Protection of Personal Data, regarding the processing of your personal data.

If in filing your complaint you feel that you have been wronged by us or if you have any doubts about the outcome of your request, you may submit it in writing to the Commissioner for the Protection of Personal Data at the below address:

Office of the Commissioner for the Protection of Personal Data
Iasonos 1, 2nd Floor
1082 Nicosia

P.O. Box 23378
1682 Nicosia
Tel.: 22818456 Fax No.: 22304565
email: commissioner@dataprotection.gov.cy

In order to exercise your rights as above or in the case where you require more information concerning your rights, you may communicate with the **Data Protection Officer** of ICCS, at the address of our registered office or through the email address stylianos@snclaw.eu

9. Changes to our Policy

Changes to the Legislation or technological developments impose corresponding modifications on our part.

You are kindly asked to keep apace with our Policy, which may at any time change in order to adapt to new developments and facts.

Our reviewed policy shall be posted on our website at the address www.mof.gov.cy.

Finally, you may ask to be supplied with a copy of the most recent version of the Policy in printed form.

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