

# The General Data Protection Regulation (GDPR) and Unum EEA Group

**Unum is an employee benefits insurance provider and acts as a Data Controller to arrange and administer insurance policies, including the processing of individual claims.**

We are currently working on a programme to ensure we comply with GDPR, based on the ICO's recommended 12-step approach. This programme will ensure we fulfil our responsibilities as a data controller and includes:

- Making sure the flow of data through Unum's business processes is controlled and used only for the purpose of delivering the prescribed service, data is only processed and stored in appropriate locations, and access to all data is limited to only those who require it as part of Unum's legitimate business activities
- Appropriate documentation and procedures are in place across all business areas, particularly to respond to all of the Rights of the Individual as specified under GDPR, including Data Subject Access Requests
- Appropriate security measures and procedures are in place to monitor and respond in the unlikely event of a security breach

We will let you know what information we need to provide a quote and ask you not to send any other personal data for this purpose. For example, we generally do not need employees' National Insurance numbers. Once cover is in place, we also use personal

data to assess, process and administer claims, individual employee policy extensions and enquiries by insured employees.

In addition to our responsibilities to the Information Commissioners Office under GDPR, Unum is authorised by the Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority (FCA) and the Prudential Regulation Authority to ensure that we have appropriate systems and controls in place to protect our customers.

## Data security

We take our responsibilities for protecting personal information seriously. Unum's information security sheet ([UP3332](#)) provides details of how we protect your data.

## Breach management

We have a robust internal process for monitoring, identifying and notifying data breaches within the prescribed timescales. This process also includes monitoring of arrangements with third parties. Where a breach is identified as being notifiable, we will advise you within 72 hours of us becoming aware of it.

## Data retention

We only keep personal data for as long as necessary for the purpose(s) that it was provided for. Typically, this is for a maximum of 7 years after the conclusion of a policy or final settlement of an individual claim. After this time, unless an exemption applies which allows us to keep it for longer, we will ensure that the relevant personal data is securely deleted.

We scan all paper records and update electronic records. Paper records are held securely for 3 months and then destroyed.

## Individual rights

We are committed to ensuring we advise all customers of their individual rights and have established processes in place to comply with the GDPR's prescribed timescales.

While the majority of policies are issued in the name of the employer, we will notify individuals of their rights if they need to make a claim. Details of these rights are also available on our website.

## Third parties

Where arrangements are made with third parties, we ensure that contracts are in place and that due diligence is carried out on an ongoing basis to ensure that they apply the same standards of care and security we maintain as a Data Controller.

## Transfers out of EEA

We generally hold personal data within the UK. Where we need to share data with our group companies or service providers for processing outside the UK and European Economic Area, we will take steps to ensure appropriate safeguards to protect the personal data are in place.

## Data Protection Officer

Unum has an appointed Data Protection Officer who can be contacted through either:

- Email to: [dataprotectionqueries@unum.co.uk](mailto:dataprotectionqueries@unum.co.uk)
- Post to: Data Protection Officer, Unum, Milton Court, Dorking, RH4 3LZ

## Chartered Institute of Procurement and Supply (excludes dental products)

As an insurer authorised by the PRA and regulated by the PRA and FCA, Unum is authorised to provide insurance policies and comply with the guidance from the Chartered Institute of Procurement and Supply on Group Risk products. Unum will not therefore enter into any Non-Disclosure Agreements or Side Agreements which could conflict with our legal and regulatory obligations.

## Unum EEA Group entities registration with Information Commissioners Office

Entity	Registration number
Unum Select Ltd	Z2275307
Unum European Holding Company Ltd	Z2985352
Unum Ltd	Z6064013
Claims Services International Limited	Z5355064
National Dental Plan Limited	Z6725119
Claims Assistance (UK) Ltd	Z4665718

## [unum.co.uk](http://unum.co.uk)

Unum Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Registered Office and mailing address: Milton Court, Dorking, Surrey RH4 3LZ Registered in England 983768 Unum Limited is a member of the Unum Group of Companies. We monitor telephone conversations and e-mail communications from time to time for the purposes of training and in the interests of continually improving the quality of service we provide.