GamaLife

INFORMATION OBLIGATIONS ON THE PROCESSING OF PERSONAL DATA

GamaLife - Companhia de Seguros de Vida, S.A., with its head office at Av. Columbano Bordalo Pinheiro 75 – 11º piso - 1070-061 Lisbon, with share capital of 50,000,000.00 Euros, registered with the Lisbon Commercial Registry Office under sole registration and legal entity no. 503 024 856 ("GamaLife"), is responsible for processing your personal data.
The privacy and the protection of your data are important to GamaLife.
For this reason, GamaLife has created a set of rules and procedures applicable to the processing of your personal data, described in brief in the General Data Protection Policy, available on our GamaLife PT site under Information on Personal Data Processing.
In this document, GamaLife provides detailed information about the processing and protection of your personal data.
When you sign up for certain products and services, you may be provided additional information regarding the processing of your personal data, to the extent necessary.

1. PERSONAL DATA PROCESSED BY GAMALIFE AS THE ENTITY RESPONSIBLE FOR PROCESSING.

GamaLife, as a Life Insurance Company, will only collect and process the personal data needed to provide you with a high-quality service that is as personalized as possible. GamaLife does not process personal data that is not necessary for the legitimate purposes it pursues. In providing services and offering products, GamaLife processes or may process several categories of personal data, including:
a) Identification details (e.g. name, gender, place of birth, date of birth, nationality, national identity card number, taxpayer identification number, passport number);
b) Contract details (e.g. account number, IBAN, details relating to your contract);
c) Contact data (e.g. address, telephone number, email addr ess);

d) Professional activity data (e.g. profession, remuneration, employer);
e) Data relating to your economic, financial, asset, and tax situation (e.g. bank account details, value of your assets, tax information);
f) Family data (e.g. marital status);
g) Voice recording data (e.g. call recordings);
h) Data relating to physical characteristics (e.g. height and weight); and
i) Lifestyle habits (e.g. do sport).

In addition, GamaLife processes special categories of personal data, as it needs to collect data concerning your health for life insurance products in the course of its business, for the purposes of insurance underwriting and contract administration, as well as for the purposes of claims management, and fraud prevention and detection.

GamaLife determines the purposes and means of processing personal data. In the course of its business activities, there are occasions and circumstances in which data processing may need to be arranged in conjunction with third parties, as set out in this document. Data subjects may request the essential terms of the relationships established with these entities from GamaLife by contacting us via email at protecaodados@gamalife.pt.
When you provide us with data on third parties (for example, personal data concerning your family members), you represent and warrant that you have informed such individuals about the disclosure and processing of their personal data, in accordance with the terms set out in this document.

2. REASONS AND SITUATIONS FOR PROCESSING YOUR DATA.

GamaLife will only process your personal data in the following situations:

2.1. To enter into an agreement with you, or take steps prior to entering into a contract at your request.

In connection with taking out life insurance, GamaLife will process your personal data for the following purposes:
a) Insurance risk assessment for the purposes of determining terms and conditions, underwriting, or amending life insurance and financial product insurance policies (e.g. analysis of clinical information or health data for the acceptance of a life insurance policy);
b) Management of contractual and commercial relationships (e.g. customer relations, including underwriting, management, termination/surrender/reimbursement or transfer of contracts and policies, monitoring of balances and financial transactions, compensations, issuing and accounting for invoices, payment of pensions, execution of customer instructions, production and issuance of statements and other documents necessary for the contractual and commercial relationship, processing of various requests, verification of pensioners' proof of life);
c) Claims management (e.g. processing and analysing information, including clinical data, to ensure the administrative, procedural and financial processing of the coverages provided under the policy);
d) Preventing and combating fraud in relation to the accuracy of the information provided to GamaLife.

2.2. To comply with legal obligations applicable to GamaLife.

As a financial institution, GamaLife is subject to numerous legal and regulatory obligations, compliance with which requires the processing of your personal data, as follows: **a)** Preparation of studies and analyses required by law, including technical and actuarial studies relating to insurance products;
b) Monitoring and control of the implementation of legally required procedures (e.g. internal control, audits);
c) Compliance with withholding, payment or reporting obligations for tax purposes, as well as the management of client attachments received by GamaLife;
d) Compliance with legal obligations, including those relating to reporting to or responding to public authorities (e.g., the Insurance and Pension Funds Supervisory Authority, the Securities Market Commission, the courts) and, specifically those relating to the calculation of provisions and solvency, technical actuarial analysis of insurance products, and notification of data breaches;
e) Compliance with legally required procedures regarding the prevention of money laundering and financing of terrorism;
f) Security and protection of personal data (e.g. implementation of logical and physical information security measures, such as backups, restoration and disaster

recovery, with regular evaluations of security measures imple mented), whenever such measures are required by law and c ompliance with such legal obligations requires the processing of your personal data;

g) Compliance with legal obligations relating to or involving complaints management and legal notifications, as well as data protection obligations (including responding to requests you make as a data subject and sending legally required communications);
h) Monitoring and prevention of cases of fraud. **2.3. To fulfil the legitimate interests of GamaLife.**

GamaLife uses your personal data to develop its products and services, improve risk management and defend your legal rights and interests, as follows:
a) Control and monitoring of operational performance (e.g. management information, product configuration maintenance, and reinsurance), based on GamaLife's legitimate interest in providing the best possible services;
b) Marketing and communication of our own products and services to customers (e.g. news that may present opportunities for signing up for products or services and portfolio analysis for new product development), based on GamaLife's legitimate interest in promoting its products and services as permitted by law;
c) Improvement and monitoring of service quality (e.g. analysis and processing of information on the quality and performance of the various service delivery methods and processes, complaint management, conducting surveys) based on GamaLife's legitimate interest in providing the best possible services;
d) Management of litigation proceedings (e.g. analysis of judicial and administrative proceedings, especially declaratory or enforcement actions, actions brought against GamaLife, criminal proceedings or proceedings of another nature), based on GamaLife's legitimate interest in ensuring the assertion, exercise or defence of its rights in judicial and extrajudicial proceedings;
e) Video surveillance, based on GamaLife's legitimate interest in ensuring the protection of people and property on its premises.

2.4. Consent.
GamaLife also processes your personal data when you have given express prior consent for this purpose, in the following cases:
a) Risk assessment for the purposes of determining the terms and conditions, underwriting or amending life insurance policies (e.g. analysing insurance application forms and setting the appropriate premium rate based on the assessed risk);
b) Management of commercial and contractual relationships (e.g. Maintaining customer relations, including signing, amendi ng or cancelling contracts, as well as mortgage and personal loans, in order to achieve commercial and contractual objecti ves and carry out the customer's instructions);
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c) Claims management (e.g. processing and analysing information to ensure administrative, procedural and financial processing).

If any telephone calls take place between the data subject and GamaLife, the latter may record such calls in the course of its business activities, provided that the data subject is informed in advance and gives their consent. This is for the purpose of managing the pre-contractual and contractual relationship, specifically as evidence of information or instructions provided, as well as to improve the services offered or contracted, and for quality control purposes.

Call recordings will be retained for the periods specified in the resolutions of the National Data Protection Commission, which set out the principles applicable to the processing of call recording data, in particular Resolution No 1039/2017.

3. RECIPIENTS OF YOUR PERSONAL DATA
GamaLife may be required to disclose or allow access to your personal data by other entities in order to comply with all of its obligations and provide you with the best possible service.
GamaLife does not transfer your personal data to entities located outside the European Union; therefore, no international data transfers will take place.

3.1. Recipients acting as independent data controllers, processors or subcontractors for GamaLife.
GamaLife will only share your personal data with the following categories of recipients:
a) Service providers (e.g. clinical services, IT services, commercial or contractual communication delivery services, document processing and archiving services, legal and audit services).
b) Reinsurers and financial institutions (for example, to conduct payment and receipt transactions in the context of contract management), life insurance companies, investment fund management companies, and pension fund management companies;
c) Public authorities such as the tax authorities, the Insurance and Pension Funds Supervisory Authority, Banco de Portugal, the Securities Market Commission, or judicial or administrative courts.
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d) Private entities performing public functions (e.g. notaries).

In its legitimate interests, GamaLife may also share your personal data with research institutions or survey organisations for statistical purposes and for improving the quality of the services it provides. Please note that you are not obligated to respond to the surveys.
Data transfers to the third parties listed above are done for the purposes set out above and in accordance with the legal bases identified therein.

3.2. Insurance intermediary.
Insurance intermediaries (e.g. NOVO BANCO S.A., NOVO BANCO dos Açores, S.A., Banco BEST, S.A.) collect personal data on behalf of GamaLife, such as the information provided in health questionnaires, and pass this data on to GamaLife for the purposes set out above.
For the purposes of promoting GamaLife's products and services, GamaLife and the insurance intermediary make decisions jointly, acting as joint controllers for the processing of personal data necessary for such promotions.
Data subjects have the right to know the essential terms of the personal data processing relationship established with the intermediary. Notwithstanding specific information that may be provided, you may always request more information from GamaLife via email at dpo@gamalife.pt.

4. RETENTION PERIOD OF YOUR PERSONAL DATA

GamaLife retains and processes your personal data for the aforementioned purposes only for as long as is necessary or required to fulfil those purposes, applying information retention criteria appropriate to each processing activity, and in accordance with applicable legal and regulatory obligations.
In this regard, your personal data will be retained for as long as the contractual relationship remains in force and, as a general rule, for a period of one year following the termination of the contractual relationship. In particular, we will retain your personal data for the following periods:
a) For the management and preparation of quotations and applications, we retain your personal data for a period of 1 year from the date of the quotation or application.
b) Regarding data processed in connection with life insurance policies, your personal data will be retained for a period of 10 years from the end of the contract;
c) Regarding data processed in connection with annuity policies (involving a claim), your personal data is retained for a period of 20 years in accordance with Article 309 of the Civil Code and, at most, for the lifetime of the insured person;
d) In order to comply with legal obligations under the legislation on money laundering and financing of terrorism, your personal data will be retained for a period of 7 years (in accordance with the provisions of Article 51 of Law No 83/2017 of 18 May);
e) GamaLife retains written complaints recorded in the complaints book, as well as the personal data necessary for handling the complaint, for a period of three years from the date the complaints book is closed;
f) For the purposes of marketing and communications about our own products and services to customers, your personal data will be retained for a period of one year following the last contact or until the data subject withdraws their consent, as applicable;
g) GamaLife retains a list of visitors for a period of six months from the date of their visit;
h) Footage recorded by video surveillance for the protection of people and property is retained for a period of 30 days.

We may process your personal data for longer than the periods indicated above in the event of legal or administrative proceedings. In such cases, we will process your personal data until the final decision in the relevant proceedings can no longer be appealed.

As the retention periods for your data vary depending on the purposes for which it is processed, if you have any questions please do not hesitate to contact GamaLife via email at: dpo@gamalife.pt.

5. EXERCISE OF RIGHTS BY DATA SUBJECTS.

5.1. Data subject rights.

With regard to the processing of your personal data, you enjoy the following rights:

a) Right to be informed: this means the right to be informed by GamaLife, among other aspects, about the purpose of processing your data, to whom it may be disclosed, which rights you are entitled to, and under which conditions you may exercise them, as well as the information you are required to provide;

b) Right of access: Whenever you so request, you have the right to obtain confirmation as to whether your personal data is being processed by GamaLife and if so, to access it, obtaining the following information:
(i) Reasons for processing your personal data;
(ii) Types of personal data being processed;
(iii) Entities to which your personal data may be transmitted, including entities located in countries outside of the European Union or international organizations, including information on guarantees used in the transfer of your data in such case;
(iv) Retention period for your data or, if not possible, the criteria for determining this period;
(v) The rights you enjoy with regard to the processing of your personal data;
(vi) Information on the origin of any personal data not provided by you;
(vii) Existence of individual automated decisions and, in such case, information on the underlying logic of this processing, together with its associated importance and consequences.

c) Right of correction: Whenever you believe your personal data is incomplete or incorrect, you may request its completion or correction.

d) Right to erasure: GamaLife is subject to numerous legal and regulatory obligations, which may limit the right to have your personal data deleted. You have the right to request erasure of your personal data under any of the following circumstances:
(i) the personal data is no longer necessary for the purpose which it was collected or processed;
(ii) you withdraw consent providing the basis for data processing, with no other legal grounds for the processing;
(iii) you object to the processing of the data, and there is no overriding legitimate interests that justify the processing, to be assessed on a case-by-case basis;
(iv) the personal data must be deleted under a legal obligation applicable to GamaLife; or
(v) the personal data has been collected in connection with offering information society services.

However, as mentioned, GamaLife is subject to numerous legal and regulatory obligations, which may limit the right to have your personal data deleted.

The right to erasure does not apply when processing is necessary for the following purposes:
(i) exercising freedom of expression and information;
(ii) compliance with a legal obligation requiring processing that applies to GamaLife;
(iii) reasons of public interest in the domain of public health;
(iv) archiving purposes in the public interest, scientific research, historical research or statistical purposes where exercising the right of erasure seriously impairs the ability to achieve the goals of this processing; or
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(v) declaration, exercising or defence of a right in judicial proceedings.

e) Right to restrict processing: Restricted processing allows the data subject to request GamaLife to restrict access to personal data or suspend processing activities.

You may request to restrict the processing of your personal data under the following circumstances:
(i) if you contest the accuracy of your personal data, for a period of time that allows GamaLife to verify its accuracy;
(ii) If GamaLife no longer needs the personal data for processing purposes, but the data is necessary for the purposes of establishing, exercising or defending a right in judicial proceedings; or
(iii) if you have objected to the processing, until it is determined that the legitimate interests of GamaLife prevail over yours.

f) Right to portability: You may request GamaLife to provide you with the personal data you have supplied in a structured, commonly used and machine readable format. You also have the right to request GamaLife to transmit such data to another data controller, provided that this is technically possible.

The right to portability only applies under the following circumstances:
(i) when the processing is based on express consent or the p erformance of an agreement with you; and

(ii) when the processing in question is done by automated means.

g) Right to object: You have the right to object to the processing of your personal data at any time, for reasons related to your personal circumstances, in the following situations:
(i) When lawfulness of processing is based on GamaLife's legitimate interests; or
(ii) When the processing is done for purposes beyond those for which the data was collected, but which are compatible with them.

In such cases, GamaLife will no longer process your personal data, unless it has legitimate reasons for such processing which override your interests.
You may also object to the processing of your data for the purposes of direct marketing, including profiling related to this marketing.

h) Right to exemption from solely automated individual decision-making: GamaLife does not make decisions that affect you based solely on automated processes.
Nevertheless, regarding any data processing that involves automated decision-making, GamaLife assures you that you will have the right to request human intervention and review, to express your views, and to challenge the decision taken.

i) Right to withdraw consent: When data is processed based on your consent, you may withdraw this consent at any time using the contact information provided below. If you withdraw your consent, your personal data will no longer be processed, unless there are other grounds such as contractual, legal or regulatory obligations, or GamaLife's legitimate interest that justifies this processing by the Insurer. Additionally, withdrawing consent does not affect any lawful processing done on the basis of consent previously given.

j) Right to file complaints with the supervisory authority: If you wish to file a complaint regarding any issues involving the processing of your personal data, you may do so with the National Data Protection Commission, the competent supervisory authority in Portugal.
For more information, go to www.cnpd.pt

5.2. How to exercise your rights.
You can exercise your rights and obtain further information by:
- Email (sent to GamaLife): dpo@gamalife.pt;
- Letter addressed to GamaLife - Companhia de Seguros de Vida, S.A., to the attention of the Data Protection Officer, at the following address: Av. Columbano Bordalo Pinheiro 75, 11º piso, 1070-061 Lisbon;
- Through your insurance intermediary: Novo Banco, Novo Banco dos Açores, Banco BEST.

6. DATA PROTECTION OFFICER.
GamaLife has appointed a Data Protection Officer, who will be responsible for monitoring compliance of GamaLife's data processing operations with the applicable legislation.
For any issues involving the processing of your personal data, or to exercise any of your rights, you can also contact the Data Protection Officer through the following channels:
- Email: dpo@gamalife.pt
- Address: Av. Columbano Bordalo Pinheiro 75, 11º piso, 1070-061 Lisbon;

7. INDIRECT COLLECTION OF YOUR PERSONAL DATA
In certain circumstances, GamaLife may collect your personal data through third parties or by other means.
In such cases, GamaLife or an entity acting on its behalf will provide you with information regarding the processing of your personal data at the earliest opportunity.

8. CONSEQUENCES OF NOT PROVIDING YOUR PERSONAL DATA
If the disclosure of your personal data is a legal or contractual obligation, or a necessary requirement for entering into a contract, we will inform you of this on the relevant form. At that time, we will also inform you which data you are required to provide and the potential consequences of failing to provide them.

9. KEEP UP-TO-DATE ON THE PROCESSING AND PROTECTION OF YOUR PERSONAL DATA
The information in this document may be subject to change over time. Therefore, we advise you to visit GamaLife's website at www.gamalife.pt, where this information will be kept up-to-date at all times so that you can stay informed on how your data is being processed.