MIDDLESEA VALLETTA LIFE
Assurance Company Limited

Data Protection Policy

Our commitment to privacy

The Data Protection Act Cap 440 places obligations on users of personal data and lays down principles for fair and lawful processing of this information. The Act entitles you to be informed about the purposes for which we process such information. We, consider it important to protect your rights as our policyholders under this Act. The purpose of this Data Protection Policy is to explain our practices and the choices that you can make about the way in which your information, insofar as it constitutes personal data for the purposes of the Act, is collected and used.

Before inception of cover

The main use of the personal information that you supply us with is to provide the specific service that you require from us. We collect personal data relating to you directly from you when you fill in a Proposal Form to apply for any of our insurance services or products. We may further collect other personal data relating to you from our agents and intermediaries, from other insurance companies, their agents and their intermediaries, as well as from insurance associations. We may further collect any information that we may require about you from any member of the medical profession, hospital, clinic, laboratory, institution, bank, insurance company or any organization or person. When you sign the Proposal Form you automatically give us your consent.

The above personal data that we so collect will be held by us and processed for underwriting and internal risk assessment purposes and for any other purpose that may be necessary for the performance of the insurance contract or as may be allowed or required by any law. We may also transfer such personal data to any company within the Middlesea Group of companies.

All our Proposal Forms require you to disclose all material facts. Material facts are facts which, we as insurers, would regard as likely to influence our assessment and acceptance of a proposal for insurance. All our Proposal Forms include a statement which draws your attention to the consequences of failure to disclose all material facts. We also include a warning that if you are in any doubt about whether certain facts are material, you should disclose these facts to us.

After inception of cover

Whilst you are our customer and at all times in the future we undertake not to transfer or exchange any information that we hold about you unnecessarily to or with any third parties without first obtaining your written consent. There may however be instances when we may disclose, share or exchange information about you with other insurance companies, insurance intermediaries, insurance managers, reinsurers, insurance associations, institutions, regulators, credit agencies, insurance surveyors, loss adjusters and insurance claims investigators. Such disclosures will however only be made for underwriting and claims handling purposes, and/or for the purpose of preventing, detecting or suppressing insurance fraud. We may also transfer such personal data to any company within the Middlesea Group of companies.

Direct Marketing

We may also use personal data relating to you to provide you with details about our products and services and those offered by other companies within the Middlesea Group of companies. Please inform us in writing should you not wish to receive such direct marketing material or should you wish to receive such material solely from us and not from any other company within the Middlesea Group. We do not disclose your personal data to any third party outside the Middlesea Group for direct marketing purposes.

It is also our practice to obtain your specific authorisation before sending direct marketing material by e-mail. If you would like to receive direct marketing material by e-mail we shall use the e-mail address which you will state.

Your right to access, rectify and, where applicable, erase the personal data we process relating to you

You also have the right to request us to inform you about the personal data that we process about you and to request its correction where necessary. Any such access/rectification requests must be made to us in writing and must further be signed by you as the data subject.

It is not our normal procedure to provide our policyholders with copies of completed Proposal Forms. However, if you ask us to provide you with any such copies then we shall comply with your request. We shall further not raise any issue under a particular Proposal Form unless you
are first provided with a copy of the form.

We shall retain your personal data up to such time required by us for underwriting or claims handling purposes.

Maintaining your personal data accurate and up to date

We make every effort to ensure that all the personal data that we process about you is accurate and regularly updated. However, should you become aware of any errors or omissions in respect of your data you are kindly requested to communicate the same to us in order that we may be in a position to effect the necessary amendments.

Middlesea Valletta Life Assurance Company Limited is licensed by the Malta Financial Services Authority to carry on long term business under the Insurance Business Act,1998.

The Middlesea Group is composed of:
Middlesea Insurance p.l.c.; Middlesea Valletta Life Assurance Company Limited;
Progress Assicurazioni S.p.A.; International Insurance Management Services Limited and Growth Investments Limited.

MIDDLESEA VALLETTA LIFE
Assurance Company Limited

Il-Prassi tal-Protezzjoni tad-Data

L-impenn tagħna għall-privatezza

L-Att dwar il-Protezzjoni tad-Data Kap 440 iqiegħed obbligi fuq dawk li jużaw data personali u jippreskrivi prinċipji għal ipproċessar ġust u legali ta' din l-informazzjoni. L-Att jagħtik id-dritt li tkun infurmat dwar l-iskopijiet li għalihom aħna nipproċessaw din l-informazzjoni. Aħna nħossuha importanti li nipproteġu d-drittijiet tiegħek taħt dan l-Att bħala assigurat tagħna. L-iskop ta' dan il-Prassi dwar Protezzjoni tad-Data hu li nispjegaw il-prattika tagħna u l-għażliet li int tista' tagħmel dwar kif l-informazzjoni tiegħek, safejn tikkostitwixxi data personali għall-finijiet ta' l-Att, tinġabar u tintuża.

Qabel ma l-kopertura tidħol fis-seħħ

L-użu prinċipali ta' l-informazzjoni personali li int tagħtina hu biex aħna nipprovdu s-servizz speċifiku li int teħtieġ mingħandna. Aħna niġbru data personali dwarek direttament mingħandek meta int timla il-*Proposal Form* biex tapplika għal xi wieħed mis-servizzi jew prodotti ta' assigurazzjoni. Aħna nistgħu wkoll niġbru data personali oħra dwarek mingħand l-aġenti u l-intermedjarji tagħna, minn kumpaniji ta' assigurazzjoni oħrajn, mill-aġenti u l-intermedjarji tagħhom, u wkoll minn assoċjazzjonijiet ta' assigurazzjoni. Aħna nistgħu wkoll niġbru ulterjorment kull informazzjoni li nistgħu neħtieġu minn xi membru tal-professjoni medika, sptar, klinika, laboratorju, istituzzjoni, bank, kumpanija ta' assigurazzjoni jew kwalunkwe organizzazzjoni jew persuna. Meta int tiffirma l-*Proposal Form* int awtomatikament tagħtina l-kunsens tiegħek.

Id-data personali ta' hawn fuq li aħna niġbru b'dan il-mod tinżamm għandna u tkun ipproċessata għal skopijiet ta' valutazzjoni ta' sottoskrizzjoni u riskji interni u għal kull skop ieħor li jista' jkun meħtieġ għall-operat tal-kuntratt ta' assigurazzjoni jew kif jista' jkun permess jew meħtieġ mil-liġi. Ahna nistghu nghaddu wkoll din id-data personali lill-kumpaniji ohra fil-Grupp tal-kumpaniji tal-Middlesea.

Il-*Proposal Forms* taghna jitolbu li int tiżvela l-fatti materjali kollha. Fatti materjali huma fatti li aħna, bħala assiguraturi, nqisu li x'aktarx jinfluwenzaw il-valutazzjoni u l-aċċettazzjoni tagħna tat-talba għal assigurazzjoni. Il-*Proposal Forms* tagħna kollha fihom dikjarazzjoni li tiġbidlek l-attenzjoni għall-konsegwenzi ta' nuqqas ta' żvelar tal-fatti materjali kollha. Aħna ninkludu wkoll twissija li jekk int ikollok xi dubju, hu x´inhu, dwar jekk ċerti fatti humiex materjali, int għandek tiżvelalna dawk il-fatti.

Wara li l-kopertura tidħol fi-seħħ

Sakemm int klijent tagħna u għal dejjem fil-futur aħna nintrabtu li ma ngħaddux jew niskambjaw xi informazzjoni li għandna dwarek bla bżonn lil jew ma' partijiet terzi bla ma qabel ikollna l-kunsens bil-miktub tiegħek. Iżda jista' jkun hemm okkażjonijiet meta nistgħu niżvelaw, naqsmu jew niskambjaw informazzjoni dwarek ma' kumpaniji ta' assigurazzjoni, intermedjarji ta' assigurazzjoni, maniġers ta' assigurazzjoni, riassiguraturi, assoċjazzjonijiet ta' assigurazzjoni, istituzzjonijiet, regolaturi, aġenziji ta' kreditu, servejers ta' assigurazzjoni, aġġustaturi ta' klejms u investigaturi ta' klejms ta' assigurazzjoni. Iżda dan l-iżvelar isir biss għal skopijiet ta' sottoskrizzjoni u amministrazzjoni ta' klejms, u/jew għall-iskop li nipprevenu, nsibu jew nissopprimu frodi fuq l-assigurazzjoni. Ahna nistghu nghaddu wkoll din id-data personali lill-kumpaniji ohra fil-Grupp tal-kumpaniji tal-Middlesea.

Bejgħ dirett

Aħna nistgħu wkoll nużaw id-data personali relatata miegħek biex nagħtuk dettalji tal-prodotti u servizzi tagħna u dawk offruti mill-kumpaniji oħra fil-Grupp tal-kumpaniji tal-Middlesea. Jekk jogħġbok infurmana bil-miktub jekk int ma tixtieqx tirċievi dan il-materjal ta' bejgħ dirett jew jekk tixtieq tircievi dan il-materjal ta'bejgh mingħandna biss u mhux minn xi kumpanija oħra fil-Grupp tal-Middlesea. Aħna ma niżvelawx id-data personali tiegħek lil xi terzi persuni barra mill-Grupp tal-Middlesea għall-iskopijiet ta' bejgħ dirett.

Hija wkoll il-prassi taghna li nistaqsuk jekk int tixtieqx ukoll tirċievi dan il-materjal ta' bejgħ dirett bl-e-mail. Jekk trid aħna nużaw l-indirizz ta' l-e-mail li taghtina int biex nipprovdulek dan il-materjal ta' bejgħ.

Id-dritt tiegħek għal aċċess, rettifika u, meta applikabbli, tħassir tad-data personali relatata miegħek li aħna nipproċessaw

Int għandek ukoll id-dritt li titlobna ninfurmawk dwar id-data personali li aħna nipproċessaw dwarek u li titlob korrezzjoni fejn ikun meħtieġ. Kull talba għal aċċess/rettifika għandha ssir lilna bil-miktub u barra minn hekk għandha tkun iffirmata minnek bħala s-suġġett tad-data.

M'hix il-proċedura normali tagħna li nagħtu lill-assigurati tagħna kopji tal-*Proposal Forms*. Iżda jekk titlobna nagħtuk xi kopji minn dawn allura aħna nissodisfaw it-talba tiegħek. Barra minn hekk aħna ma nqajjmux xi kwistjoni taht xi *Proposal Form* partikolari jekk int qabel ma tkunx gejt moghti kopja tal-formola.

Aħna nżommu d-data personali tiegħek sakemm tkun meħtieġa minna u għal skopijiet ta' sottoskrizzjoni jew amministrazzjoni ta' klejms.

Żamma tad-data personali tiegħek eżatta u aġġornata

Aħna nagħmlu kull sforz biex niżguraw li d-data personali kollha li nipproċessaw dwarek tkun eżatta u aġġornata regolarment. Iżda jekk int tinduna b´xi żbalji jew ommissjonijiet fir-rigward tad-data tiegħek int ġentilment mitlub tikkomunika dawn lilna biex nistgħu nkunu f´qagħda li nagħmlu l-emendi neċessarji.

Il– Middlesea Valletta Life Assurance Company Limited hija liċenzjata mill-Awtorita ta' Malta għal Servizzi Finanzjarji biex tmexxi negozju għat– tul taħt l-Att ta' l-1998 dwar Negozju ta' Assigurazzjoni.

Il– Middlesea Grupp hija ffurmata minn dawn il-kumpaniji:
Middlesea Insurance p.l.c.; Middlesea Valletta Life Assurance Company Limited;
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