

Data Privacy Notice

Allianz Global Life dac (“AGL”), a part of the Allianz Group, is an Irish authorised insurance company providing Pension products and services. It operates through distribution agreements with brokers, as well as online.

AGL is committed to safeguarding the personal information collected from our Policyholders/and their Beneficiaries. In accordance with article 13 of Regulation (EU) 2016/679 (hereinafter the “General Data Protection Regulation” or “GDPR”), this Data Privacy Notice explains how and what type of personal data will be collected, why it is collected and to whom it is shared or disclosed.

Please read the following information carefully.

1. Who is the Data Controller?

A data controller is the natural or legal person, public authority, agency or other body which (alone or jointly with others) determines the purposes and means of the processing of personal data. Allianz Global Life dac, with registered office in Maple House, Temple Road, Blackrock, Dublin, A94 Y9E8, Ireland, email dataprivacy-agl@allianz.com, is the Data Controller as defined by the GDPR.

2. What type of personal data is collected?

AGL processes (collects, records, stores, shares and otherwise uses) the personal data of the Insured Person and the Beneficiaries (hereinafter each one of these may also be identified as the “Data Subject”), such as their name, address, gender, date of birth, place of birth, telephone number, email address, tax identification number, identity document number and bank details (the “Data”).

AGL may also collect and process “special categories of personal data” about Data Subjects, information taken from death certificates, searches of public sources for evidence of criminal convictions or political position holders.

3. What is the legal basis for the processing of the Data?

The personal data provided by the Data Subject or by other authorized individuals, will be processed for the following purposes:

Purpose	Lawful Basis for Processing	Categories of personal data?
3.A Pension Related Purposes		
<p>Fulfilment of pre-contractual and contractual obligations and obligations deriving from the pension relationship with the Data Subject.</p> <p>Execution of the Contract, including risk evaluation, premium collection, prevention, and identification of fraud as well as purposes in connection with the handling and settlement of claims and disbursement for other reasons.</p> <p>Handling of specific requests of the Data Subject, as well as for the provision of the benefits related or ancillary to the Contract.</p>	<p>Necessary and proportionate to do so in pursuing the administration of the pension product (per Art.9(2)(b) GDPR in respect of the processing of Special Categories of Personal Data)</p> <p>Necessary for the performance of a contract to which the Data Subject is a party in relation to the administration of the pension product (per Art. 6(1)(b) GDPR).</p>	<p>Personal Data relating to the Policyholders/ and their Beneficiaries/ Dependants.</p>
3.B Administrative Purposes		
<p>Carrying out administrative and accounting activities and activities concerning the performance of the pension product concerned, in accordance with law and AGL's obligations, including where AGL is authorized e.g., by the Revenue Commissioners or Pensions Authority or other relevant regulatory authorities.</p>	<p>Necessary to comply with AGL's legal obligations (as described above) (per Art. 6(1)(c) GDPR).</p> <p>Necessary for the purposes of the legitimate interests pursued by AGL in ensuring the proper and efficient administration of the pension product concerned, where such interests are not overridden by the fundamental rights of the Data Subject which require protection (per Art. 6(1)(f) GDPR).</p> <p>Necessary for the purpose of establishing, exercising or defending a legal claim (Article 9(2) (f) GDPR in respect of the processing of Special Categories of Personal Data).</p>	<p>Personal Data relating to the Policyholders/ and their Beneficiaries/ Dependants.</p>

Purpose	Lawful Basis for Processing	Categories of personal data?
3.C Purposes set forth by the law		
<p>Compliance with legal and regulatory obligations (e.g., fiscal, accounting and administrative obligations) required under EU regulations or orders issued by the competent national authorities and other public bodies and accounting and business requirements of AGL or in the context of disputes or legal claims.</p>	<p>Necessary to comply with AGL's legal obligations (as described above) (per Art. 6(1)(c) GDPR).</p> <p>Necessary for the purposes of the legitimate interests pursued by AGL where such interests are not overridden by the fundamental rights of the Data Subject which require protection (per Art. 6(1)(f) GDPR).</p> <p>Necessary for the purpose of establishing, exercising or defending a legal claim (Article 9(2) (f) GDPR in respect of the processing of Special Categories of Personal Data).</p>	<p>Personal Data relating to the Policyholders/ and their Beneficiaries/ Dependants.</p>
3.D Marketing Purposes		
<p>Carrying out of marketing activities by the Data Controller or the other companies of the Allianz Group or by selected third parties through the sending of advertising material, direct sale, carrying out of market research, commercial communications concerning services and products of AGL as well as products and services of the Allianz Group or third companies (business partners of AGL) by traditional and/or distance communication means (such as email, phone and any other form of electronic communication).</p>	<p>Explicit consent from the Data Subject (per Art.6(1)(a) GDPR)</p>	<p>Personal Data relating to the Policyholders/ and their Beneficiaries/ Dependants</p>
3.E Purpose of sending communications in the electronic format		
<p>Sending pre-contractual, contractual and ongoing documentation through electronic means of communication including any information required to be disclosed to Data Subjects by applicable law.</p>	<p>Necessary for the performance of a contract to which the Data Subject is a party in relation to the administration of the pension product concerned (per Art. 6(1)(b) GDPR).</p> <p>Necessary to comply with AGL's legal obligations (as described above) (per Art. 6(1)(c) GDPR).</p> <p>Necessary for the purposes of AGL's legitimate interest and those of the Data Subject in ensuring the proper and efficient administration of the pension product concerned, where such interests are not overridden by the fundamental rights of the Data Subject which require protection (per Art. 6(1)(f) GDPR).</p> <p>Necessary and proportionate to do so in pursuing the administration of the pension product (per Art.9(2)(b) GDPR in respect of the processing of Special Categories of Personal Data).</p>	<p>Personal Data relating to the Policyholders/ and their Beneficiaries/ Dependants.</p>

4. How is the Data collected and processed?

AGL will obtain the personal data directly from Data Subject, from your employer and/or from the distribution chain, other pension providers, professional associations, and public authorities.

In relation to all the purposes mentioned above, the personal data will be processed manually or by using electronic means which are adequate for the storage, safeguard, and communication of such data. For such purpose, all the necessary security measures will be taken to ensure that there is a sufficient level of protection from non-authorized accesses, loss, or accidental destruction of the data.

For such purpose, access to AGL's databases and records will be limited to:

1. The employees of AGL specifically identified and authorized to carry out the processing.
2. Individuals external to the organization of AGL, part of the pension chain or service companies who may act, from case to case, as autonomous data controllers or external data processors.

5. Who will have access to the Data?

For the purposes set forth in section 3.A, 3.B and 3.C of this Data Privacy Statement, the Data of the Data Subject may be disclosed to the following entities acting as independent data controllers: Public authorities and organisations (e.g., the Revenue Commissioners and other regulatory authorities), other pension providers, consortia and trade associations, insurance brokers, banks, and asset management companies.

For the purposes set forth in section 3.A, 3.B and 3.C of this Data Privacy Statement, the Data of the Data Subject may also be shared with the following parties who operate as data processors under our instruction: members of Allianz Group, companies in the distribution chain; technical consultants and other persons providing auxiliary services on behalf of AGL, such as legal advisers; financial settlement agencies; claims management; legal protection consultants and support centres; data storage companies or IT service providers; mail delivery companies; audit companies and consultants; business information companies for financial risk analysis; fraud control agencies.

For the purposes set forth in section 3.D of this Data Privacy Statement, the Data of the Policyholder may be shared with the following parties who operate as data processors under our instruction: Advertisers and advertising networks to send marketing communications, as permitted under local law and in accordance with Policyholder's marketing preferences. An up-to-date list of those entities may be requested, free of charge, by contacting AGL as set forth in section 9 of this Data Privacy Notice.

6. Where will the Data be processed?

The personal data may be processed both inside and outside of the European Economic Area (EEA) by the parties specified in Section 5 above, subject always to contractual restrictions regarding confidentiality and security in line with applicable data protection laws and regulations. AGL will not disclose personal data to parties who are not authorized to process them.

Whenever AGL transfers personal data for processing outside of the EEA by another Allianz Group company, it will do so on the basis of Allianz' approved binding corporate rules known as the Allianz Privacy Standard (Allianz BCR) which establish adequate protection for personal data and are legally binding on all Allianz Group companies. Allianz BCR and the list of Allianz Group companies that comply with them can be requested as set forth in section 9 of this Privacy Notice. Where the Allianz BCR do not apply, AGL will instead take steps to ensure that the transfer of the personal data outside of the EEA receives an adequate level of protection as it does in the EEA. Details of what safeguards AGL relies upon for such transfers (for example, Standard Contractual Clauses) can be requested by contacting AGL as detailed in section 9 of this Data Privacy Notice.

7. How long will the Data be kept for?

The personal data collected, pursuant to paragraphs 3.A 3.B,3.C and 3.D of this Privacy Notice, will be retained for a period of time which is equal to the duration of the Contract (including any renewals thereof) and for the following 7 years from the expiry, termination, withdrawal from the latter, save for cases where a longer retention period is required for possible disputes, requests of the competent authorities or pursuant to the applicable legislation.

Once the retention period is over the data will be deleted or anonymized.

8. What are the rights of the Data Subject in respect of their personal data?

As set forth by the applicable legislation on data protection, the Data Subject has the right to:

- Access a copy of the personal data held about them and to learn the origin of the data, the purposes and ends of the processing, the details of the data controller(s), the data processor(s) and the parties to whom the data may be disclosed
- Withdraw the consent at any time where the personal data is processed based on their consent provided that such withdrawal shall not affect the lawfulness of processing conducted on the basis of consent prior to its withdrawal ; This does not include cases where the processing is required to fulfil a legal obligation of the Data Controller or to execute a public interest task or is in connection with exercising official authority by the Data Controller
- Request to have the data updated or corrected so that it is always accurate
- Right to erase your personal data (in limited circumstances)
- Right to data portability of the personal data you have provided to us
- Right to object to the processing of your personal data
- Request to restrict the processing of the personal data in certain circumstances
- Obtain your personal data in an electronic format for own use or for a new insurer; and
- File a complaint with us and/or the Data Protection Commission as AGL's supervisory authority. We ask that you first engage with us to provide us with the opportunity to address any concerns

The Data Subject may exercise these rights by contacting AGL as detailed in section 9 of this Data Privacy Notice providing their name, email address, account identification and purpose of the request.

You will not have to pay a fee for exercising your rights, save for where such a request is determined to be manifestly unfounded or excessive in which case a reasonable fee may be imposed or we may refuse to act on the request. We have one month to respond to you in relation to a request, subject to the possibility of us seeking an extension of two months where justified.

9. How can AGL be contacted?

Any queries about how the personal data is used or how to exercise the Data Subject's rights can be addressed to the Data Protection Officer by telephone, email or post as follows:

Mail	Email
DPO c/o Allianz Global Life dac Maple House Temple Road Blackrock Co. Dublin, A94 Y9E8	dataprivacy-agl@allianz.com

10. How often is this Data Privacy Notice updated?

AGL regularly reviews this Data Privacy Notice. AGL will ensure that the most recent version is available on the company's website www.allianzgloballife.ie/documents/dataprivacynotice and will inform the Data Subjects directly of any important amendments that may impact him/her or require his/her consent.

In the event that your query is not resolved to your satisfaction, you have the right to raise the matter with the Data Protection Commission at 21 Fitzwilliam Square South, Dublin, D02 RD28 or via its website, <https://www.dataprotection.ie/en/contact/how-contact-us>.

This Data Privacy Notice was updated on 06/03/2025.