



# General Data Protection Regulation

## *European Union GDPR Privacy Notice*

### **Purpose and Scope of Notice**

The European Union (EU) General Data Protection Regulation (GDPR) provides individuals in the EU with rights regarding their personal data and places certain data protection compliance obligations on organizations. This Privacy Notice (Notice) is intended to explain how your Personal Data will be handled by Unum Group's US based operations that may be subject to the GDPR ("Unum US") (the "Company," "we," "us") and sets out the information including the personal information described below relating to you ("Personal Data") that may be collected and processed by Unum and/or on its behalf by its third party service providers in the context of providing insurance products and services to you.

This Notice applies to individuals living in the EU who are filing a claim or applying for coverage under policies issued by one of Unum Group's U.S. based subsidiaries, to the extent that business is subject to the GDPR, and others as required by law. This Notice does not apply to individuals insured through Unum's subsidiaries in the United Kingdom.

### **Who we are**

Through its subsidiaries, Unum Group offers employee benefits insurance products and services. Unum's corporate headquarters are located at 1 Fountain Square, Chattanooga, TN 37402. For the purposes of this notice, Unum will be the "data controller" of your Personal Data which means we will make decisions regarding the processing of your Personal Data for the purposes described in this Notice and that we will have certain compliance obligations regarding that data.

### **Your Personal Data and consent (legal basis for processing)**

Unum, and/or its third- party service providers, may need to collect and process your Personal Data in order to provide insurance products and services to you. This may include performing individual medical underwriting prior to issuing insurance coverage or evaluating and/or administering your claim for insurance benefits or to respond to your request for related services. We also may process your Personal Data for the following purposes:

- Set up/ administer insurance policies
- Comply with our legal obligations under the law;
- For analysis and/or audit purposes;
- Respond to any complaints regarding our products or services;
- Defend or bring any existing or potential legal claims; and
- Comply with record retention requirements under the law.

When required to do so by law, we will ask for your consent before collecting and processing your Personal Data. You have the right to withdraw your consent at any time. However, doing so may make it difficult or impossible for us to provide you with insurance products or services, including administering claims you may submit.

### **Automated Decisions**

We may use an automated decision-making process to review your information submitted for insurance purposes. You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects. Please contact us if you would like additional information about this process and how it may or may not impact you.

### **Categories of Personal Data and Consent**

We may collect and process all or some of the following Personal Data about you, for the purposes explained in this Notice:

- Any medical or health information including HIV, AIDS or other disorders of the immune system
- Use of drugs or alcohol
- Medical records and information for treatment, advice, consultation for Behavioral Health and/or Physical condition(s)

- Prescription drug history
- Earnings- pre and post-date of disability
- Financial and credit history
- Professional licenses
- Employment and education history
- Insurance claims and benefits
- Daily activities
- Litigation and settlement information pertaining to your impairing condition(s)
- All other claims and benefits, including Social Security claims and benefits

### **With whom we share your Personal Data**

Where permitted by law, Unum may share your personal data with the following:

- Third-party service providers
- Insurance service providers
- Insurance companies
- Regulatory authorities
- Law enforcement agencies
- Legal advisors
- Medical professionals or other healthcare providers
- Financial institutions and/or banks
- Governmental entities
- Any employee benefit plan sponsored by your employer
- Any person providing services or insurance benefits to (or on behalf of) your employer, any such plan or claim, or any benefit offered by Unum
- The Social Security Administration.

### **How we safeguard your Personal Data**

Unum has put in place appropriate technical and organizational measures that are designed to protect the Personal Data the we hold from misuse, loss, or unauthorized access. The measures include procedures for identifying and addressing suspected data breaches.

### **Where we hold and/or send your Personal Data**

This information may be viewed from, transferred to, or stored, in the United States or other countries outside of the European Economic Area (EEA) by other members of the Company or other authorized parties.

### **If you don't provide Personal Data**

We will only ask for Personal Data that we need for the purposes described in this Notice. If you do not provide certain information, we may not be able to provide insurance or services to you. For example, if you do not provide the information requested on a claim form we may not be able to process your claim. If you do not want to provide certain information but are not sure of the impact that it will have on the service, please contact us.

### **Your rights and how to exercise them**

You have the following rights under the GDPR:

- **The Right to be Informed** – you have the right to be provided with clear, transparent and easily understandable information about how we use your Personal Data. This is why we are providing you with the information in this Privacy Notice.
- **The Right of Access** – you have the right to obtain access to your Personal Data, if we are processing it, and certain other information similar to that provided in this Privacy Notice.
- **The Right of Rectification** – you have the right to have Personal Data corrected if it is inaccurate or incomplete. You may ask us to take reasonable measures to correct your information.
- **The Right of Erasure** – this is also known as the “right to be forgotten”. This right allows you to request the deletion or removal of your Personal Data where there is no compelling reason for us to keep the Personal Data. This is not a general right to erasure, as there are certain exceptions.

- **The Right to Restrict Processing** – you have rights to “block” or suppress further use of your Personal Data when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your Personal Data, but may not use it further.
- **The Right to Data Portability** – you have rights to obtain and reuse certain Personal Data for your own purposes across different organizations. This only applies to your Personal Data: (1) that you have provided to us that we are processing with your consent or to perform a contract to which you are a party and (2) that is being processed by automated means.
- **The Right to Object** – you have the right to object, on grounds relating to your particular situation, at any time to processing of your Personal Data which is based on the legitimate interests of Unum or a third party. We will be allowed to continue to process the Personal Data if we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, including for the establishment, exercise or defense of legal claims. Where Personal Data is processed for the purposes of direct marketing by us, you have the right to object to that processing at any time for such marketing, which includes profiling to the extent that it is related to such direct marketing. If you do notify us of your objection, we must stop processing your Personal Data for marketing purposes.

### **How to update your personal information**

It is important that the Personal Data we hold about you is accurate and up to date. Please let us know if your information changes, or the information we hold about you is incorrect.

If we have disclosed the Personal Data in question to another company, we will also let them know about the changes unless it is impossible or difficult to do so.

### **How long do we keep your personal information**

We will keep your information for as long as we have a relationship with you. Once your relationship with us has come to an end, we will retain your personal information for up to 10 years or longer if needed to enable us to meet our legal obligations as outlined in the “How we use your information” section. We will delete your personal information when it is no longer required for these purposes.

### **Changing our Privacy Notice**

We may change this Privacy Notice from time to time to keep it up to date, or to comply with legal requirements.

### **How to contact us**

For questions regarding this Notice, or for inquiries regarding the Personal Data collected from you that is covered by this Notice please contact our Chief Privacy Officer at the following address:

Unum Group  
Attn: Chief Privacy Officer/Privacy Office  
2211 Congress Street  
Portland, Maine 04122  
Email: [Privacy@Unum.com](mailto:Privacy@Unum.com)

If after contacting the Chief Privacy Officer/Privacy Office, you are not satisfied by the effort and response by the Company, you also may have the right to contact the data protection supervisory authority in the country in which you are living.