Life Insurance Corporation(Lanka) Ltd

Data Privacy Policy

Version: 2.0
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Privacy Policy

1. Introduction

Life Insurance Corporation (Lanka) Ltd., is a company registered in Sri Lanka with the company's registered office located at No. 29/2, Sharnell Building, Vishaka Road, Colombo 04.

Your privacy is important to us, and we want to assure you that the Personal Data we collect about you will be treated with care. This Privacy Policy will inform you about how we look after your Personal Data when you avail the insurance products and services offered by us when you visit our website, interact with us over the phone, via email, through our mobile applications or otherwise by using any of our social media platforms, or contract with us, your privacy rights and the protection afforded by law.

By accepting the terms of the Privacy Policy, contracting with us and/or continuing to avail insurance products and services offered by us, you agree that you have read, understood, and agreed to this Privacy Policy.

2. Definitions

This Privacy Policy uses a number of definitions which are set out below:

Personal Data

Any information which identifies an individual or information relating to an individual who can be identified (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data does not include anonymous data or data that has had the identity of an individual permanently removed. Personal Data shall include Special Categories of Personal Data (defined below) as well.

Processing or Process

Any activity that involves the use of Personal Data. It includes obtaining, recording, or holding the data, or carrying out any operation or set of operations on the data including collecting storing, reserving, organizing, amending, retrieving, using, disclosing, erasing, or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

Special Categories of Personal Data

Any data which reveals details about sensitive issues such as an individual's including a child's race or ethnicity, religious or philosophical beliefs, sexual relations, sexual orientation, political opinions, trade union membership, offences, proceedings, convictions, information about health, genetic and/or bio metric data.

3. Important Information on Personal Data

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how we collect and process your Personal Data and through use of our website, including any data you may provide when you apply for a career at our Company or over the phone, via email, through our mobile applications or otherwise by using any of our social media platforms. This website is not intended for children, and we do not knowingly collect data relating to children unless provided by their parents or guardians.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on differing occasions when we are collecting or processing Personal Data and about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

Data Controller

We are the Data Controller of all Personal Data relating to our clients, investors, employees, and third-party contactors, as well as any other Personal Data used in our business for our own commercial purposes. This means that we are responsible for determining when, why and how to Process Personal Data and for establishing practices and policies in line with applicable data protection law.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

Contact details:

Full name of legal entity	: LIC (Lanka) Ltd.
Name or title of DPO	: Data Protection Officer
Email address	: itmanager@liclanka.com
Postal address	: Sharnell Building, 29/2, Visaka Road, Colombo 4, Sri Lanka.
Telephone number	: +94 11 2552277.

Importance of accurate personal information and timely updation of changes.

It is important that the Personal Data we hold about you is accurate, valid, and up to date. It is your obligation as well to keep us informed if your Personal Data changes during the continuant of your relationship with us.

Sharing of information from secured personal devices.

It is important that you ensure the security of the devices used to transfer Personal Data to us as no data transmissions over the Internet can be guaranteed to be 100% secure. Therefore, it shall be your responsibility to secure such devices against security and cyber risks.

Please bear in mind we will also not ask for your Personal Data or account information (as applicable) by any unsolicited means of communication. Therefore, you are responsible for keeping your Personal Data and account information secure and not sharing it with others.

Third party consent

In the event you provide us with any personal information or data on behalf of another person including any Personal Data, for the purposes of providing insurance products and services, an inquiry with the Company or for any appointment, related contract or requirement, you confirm that the information and data has been obtained by you and provided to us with the prior specific consent of such person who has fully apprised himself/herself of terms and conditions of this privacy policy. Such third-party Personal Data or information provided by you shall be accurate, up to date, valid and not include any false, inaccurate information, any misstatements of fact, misrepresentations or the like.

Unauthorised links

We have not authorised any third-party websites, links, plug-ins and applications to collect or share data. We request you to fully apprise yourself the credibility of the links, websites or applications and their terms and conditions before providing your personal data. We are not responsible for any third- party actions or their security controls in respect of any Personal Data they may collect or process via their website, service or otherwise.

4. The Data We Collect

Personal Data

We may collect from you in a variety of ways, including but not limited to when you visit our website, subscribe to our newsletter, fill out a form and in connection with any other with our insurance products and services or over the phone, via email, through our mobile applications or otherwise by using any of our social media platforms. We may use, store, and transfer different kinds of Personal Data about you and those of third parties you disclose to us which we have grouped together as follows:

i. Personal Data which you directly and voluntarily submit to obtain our products and services or clarification relating to our services which may include your name, address, national identification number, date of birth, email address, contact information and other information as appropriate.

ii. Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

iii. Usage Data includes information about how you use this website or services.

iv. Marketing and Communication Data includes your preferences in receiving marketing from us and any other third parties for which you have consented to and your communication preferences.

Aggregated and Anonymized Data

When you visit this website or use any digital applications of our Company, we may also collect, use, store and share aggregated, anonymized, statistical, or demographic data (Aggregated Data and/or Anonymized Data). Aggregated Data and/or Anonymized Data may be derived from your Personal Data but is not considered Personal Data in law, as it cannot directly or indirectly reveal your identity.

Aggregated Data and/or Anonymized Data may include the time and length of your visit to this website, the pages you have visited on this website, as well as details of the website you visited immediately prior to visiting this website. We may also record the name of your internet service provider. We may use such and/or Anonymized Data to conduct such analytical activities, to measure site activity and to develop ideas for improving our services. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine Aggregated and/or Anonymized Data with your Personal Data in a manner that you can be identified (directly or indirectly), we will treat such combined data as Personal Data.

If you fail to provide Personal Data or provide inaccurate or false Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, our website terms and conditions or where such Personal Data is required to furnish further information regarding the provision of any of our services or we are required that information mandatorily to provide the insurance products and services you are looking for and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In these circumstances, we have the right to cancel or refuse to accept the services you are looking for, but we will notify you if this is the case at the time.

In the event we have reason to believe that any Personal Data provided by you is false, inaccurate, a misstatement of fact, a misrepresentation, an act of identity theft, a violation of any third party right or similar circumstance, we have the right to refuse any services you require, terminate our contract if any, with you and where relevant, report you to the requisite regulatory authorities.

5. How is Your Personal Data Collected?

We use different methods to collect data from and about you including through:

Direct interactions. You (or a person or an agent acting on your behalf) may give us your Personal Data by corresponding with us by post, phone, email, directly through the website social media platforms or otherwise, by subscribing to our newsletter or by filling a form or otherwise. This includes Personal Data provided to us when you:

- give us feedback.
- making complaints on our services.

Our Website - As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using

cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see paragraph 6 below and our Cookie Policy for further details.

Our mobile website and digital applications. Our mobile website and mobile applications have the ability to access mobile device information to better serve our clients.

Third parties or publicly available sources. We may receive Personal Data of you from various third parties and public sources such as set out below:

- analytics providers within and/or outside Sri Lanka (such as Google based analytics providers).
- advertising networks based within and/or outside Sri Lanka.
- search information providers within or outside Sri Lanka.

6. How We Use Your Personal Data

We will only use your Personal Data in the manner permitted by law. Most commonly, we will rely on the following types of lawful basis to process your Personal Data:

Legitimate Interests: The interests of our Company in conducting and managing our business in order to give you the highest standard of service and the best and most secure experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your express consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract: processing and using your data is necessary for the performance of any service or contract to which you are a party or to take steps at your request before entering into such a contract and the provision of the same to our service providers, agents and other parties as required for the purpose of facilitating the performance of the contract with you.

Comply with a legal or regulatory obligations: processing, use and disclosure of your Personal Data may be necessary in order to ensure compliance with legal or regulatory obligations to which we are subject or to comply with requests by Government, law enforcement, regulatory, judicial or related authorities in relation to obligations arising under law, regulation, national or public security or related inquiry.

Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of primary ways we will use your Personal Data and which types of legal basis we rely on to do so. However, it may not be an exhaustive list and we will be able to provide additional information you may require in that regard upon request.

Purpose/Activity	Type of data
To provide you with further information, advise, services or in the performance of a contract.	Personal Data
To manage our relationship with you which will include: • Improving our services and to facilitate any requests made and insurance products obtained by you and to promote the products and services of the Company and its brand. • Personalizing your usage experience. • To improve customer service; the information you provide helps us respond to your customer service requests and support needs more efficiently. • To personalize user experience, we may use information in the aggregate to understand how our customers as a group use the services and resources provided on our website and our Company. • We may use feedback you provide to improve our products and services. • To run a promotion, contest, survey, or other website feature to send you information you agreed to receive about topics we think will be of interest to you. • To send periodic emails and SMS alerts, we may use contact details to send User information and updates on your insurance policy. It may also be used to respond to your inquiries, questions regarding our insurance products and services. If you decide to opt-in to our mailing list, you will receive emails and SMS alerts that may include company news, updates, related product, or service information, etc.	Technical Usage Marketing and Communications
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Technical

Purpose/Activity	Type of data
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Usage Marketing and Communications Technical
To use data analytics to improve this website, services, marketing, client relationships and to improve user experiences. To generate performance analysis and insights to help you achieve your fitness and wellness goals.	Technical Usage
To make suggestions and recommendations to you about services that may be of interest to you	Technical Usage

Cookies

Our website makes use of cookies to measure site activity and to enhance your experience in searching our products and services. Cookies are alphanumeric identifiers that are sent to your computer when you visit websites and online services. If your web browser's preferences are set to accept it, the cookie is stored on your computer's hard drive. Cookies enable our website to recognize your preferences and to tailor content to you. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so and where relevant obtain your prior consent.

7. Disclosure of Your Personal Data

We may have to share your Personal Data with the parties set out below for the purposes set out above.

Internal Third Parties

Branches and offices based in Sri Lanka who are acting as joint controllers or processors, consultants or service providers including in relation to services you may require data analytics, marketing and research, revenue optimization and other services in connection with the operations of our business.

External Third Parties

- Service providers, contractors, and agents acting as processors based on who provides services such as data processing and analytics, marketing and research, revenue optimization and other services to us in connection with the operations of the business of LIC (Lanka) Ltd
- Business partners of LIC (Lanka) Ltd including without limitation any and all service provider with whom LIC (Lanka) Ltd have entered into agreements to provide you with value added services. Thus, if you intend to avail such value-added services offered by our service providers when using our website and/or mobile application, you hereby consent to share your Personal Data with such service Providers.
- Professional advisors or those acting as processors or joint controllers, including actuaries, lawyers, bankers, and auditors who provide consultancy, banking, legal and accounting services.
- With any law enforcement authority or governmental institution for security or any other investigative purpose.
- Regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your Personal Data (Non-Disclosure Agreement) and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

9. International Transfers

We operate in many different jurisdictions and obtain services of different service providers from different jurisdictions. Hence, accordingly, it may be necessary to transfer your data outside Sri Lanka.

10. Data Security

We have put in place appropriate security measures to prevent your Personal Data from being unauthorized processing, accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to detect and deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Please bear in mind that we cannot accept responsibility for any unauthorized access or loss of Personal Data that is beyond our control.

11. Data Retention

How long we will use your Personal Data?

We will only retain your Personal Data and for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or reporting requirements. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you may ask us to delete your data.

In some circumstances we may anonymize your Personal Data (so that it can no longer be associated with you, and you can no longer be identified by it) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

Under certain circumstances, you have the following rights under data protection laws in relation to your Personal Data:

- **Request access to your Personal Data**
- (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- **Request correction of the Personal Data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your Personal Data.** This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you

have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Objection to process your Personal Data** where your rights override our legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Restriction in processing of your Personal Data**. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is misleading and/or inaccurate but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Withdrawal of Consent** at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us or the DPO (contact information provided above).

No fee usually required.
You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is unfounded, unreasonable, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you
We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond.
We will use all best endeavours to respond to all legitimate requests within twenty-one days.

Occasionally, it may take us longer if your request is particularly complex or you have made a number of requests. We will keep you updated in such case.

12. Use of CCTV

We use CCTV across our Head Office premises and certain branches to ensure the safety of all our customers, patrons, employees, services providers and business partners. In particular, we may use CCTV footage to monitor the behaviour of all persons within our premises and where relevant to aid investigations into potential or actual criminal, fraudulent incidents, or other incidents of a related nature. We may share such footage with law enforcement authorities and/or judicial authorities to assist with investigations, proceedings or any legal action.

13. Changes to this Privacy Policy

Company may amend this Privacy Policy from time to time in accordance with applicable laws, regulations, best practices and the updated version will be posted on this website. We request that you revisit this website from time to time for updates on the Privacy Policy.

Historic versions of this Privacy Policy can be obtained by contacting the DPO.

The Privacy Policy may be translated into different languages, and in the event of any inconsistency among the versions, the English version shall prevail.

14. Clarifications or Complaints

If you have any comments, questions, concerns, or complaints about the contents of this Privacy Policy or the way in which we use your information, we encourage you to contact the Company DPO (information provided above) in this regard.

15. Intellectual Property Rights

The material and content provided on the Website are strictly for your personal and non-commercial use only. However, you could save where expressly provided, and you agree not for yourself or through or by way of assistance from any third party to distribute, copy, extract or commercially exploit such material or contents. Except as otherwise indicated, all materials on this Website, including, but not limited to text, information such as; customer or partner references, data, images and pictures, illustrations and written and other materials contained in this website are protected by copyrights, database rights, trademarks and /or other Intellectual Property rights owned, or used with permission of their owners by us or our partners, affiliates or associates. This Website is protected by copyright and other intellectual property rights. All rights reserved.

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