

# INVL Life Marketing Register Description in the Baltics

## 1 Data controller

UADB "INVL Life" (Registration code 305859887)

Gynėjų g. 14  
LT-01109  
Vilnius  
Lietuva

## 2 Contact information for the data protection officer

INVL Life data protection officer contact is following:

Data Protection Officer

"INVL Life", UADB

Gynėjų g. 14, LT-01109 Vilnius, Lithuania

[dap@invl.com](mailto:dap@invl.com)

In Baltics you can contact INVL Life customer service in each country.

INVL Life, Customer Service

Estonia:

Keemia 4, 10616 Tallinn, Estonia, +372 681 2300

Latvia:

Elizabetes 10B-1, LV-1010 Rīga, Latvija , +371 675 03333

Lithuania:

Gynėjų g. 14, LT-01109 Vilnius, Lietuva, +370 8 700 55 959

## 3 Purpose and legal basis for the processing of personal data

The purpose of processing personal data is the marketing of INVL Life insurance products and services, the marketing of products and services of other companies belonging to the Group of INVL companies, the management of marketing authorisations and prohibitions, as well as the management of contact information.

The legal basis for the processing of personal data is the fulfilment of legitimate interests of INVL Life (for example, with regard to carrying out customer satisfaction surveys, developing services and direct marketing to current, former and potential customers) and in certain cases consent.

## 4 Categories of data subjects

- Current INVL Life customers
- Former INVL Life customers
- Potential customers
- INVL Life website visitors

## 5 Disclosure of data

We may disclose personal data on the basis of the data subjects' consent to other companies. However, if we decide to sell, buy, merge or otherwise reorganize our businesses, this may involve us disclosing and/or transferring personal data to prospective or actual buyers and their advisers on the basis of our legitimate interests, or receiving personal data from sellers and their advisers.

## 6 Transfer of personal data outside the European Union or the European Economic Area

Personal data is retained and processed mainly in the EU and the EEA. If data is transferred outside the EU and the EEA to countries for which the European Commission has not issued a decision of adequacy of data protection, we will take care of the data protection, for example, by utilising standard contractual clauses approved by the European Commission. Sensitive data is not transferred outside the EU and the EEA. Transferred data is processed only on behalf of INVL Life.

## 7 Retention period for personal data

Data of persons who have received an insurance quote is retained for 5 years after the quote was made. We retain the data of other potential customers for a maximum period of 3 years. The data of the persons who have concluded the insurance contract shall be used for marketing purposes during the validity of the insurance contract and for 2 years after the end of the contract, but not longer than before the data subject withdraws consent for processing of data for direct marketing purposes.

## 8 Categories of personal data

The data we process depends on what person or customer category you belong to.

- Basic personal data
  - For example, name, profession, language, age, contact information.
- Marketing authorisations and prohibitions
  - For example, e-mail letter subscription, stated interests
- Contact information

- For example, electronic messages.
- Telephone recordings
  - Telephone recordings from INVL Life customer service in Estonia.
- Network identification
  - For example, IP address.
- Web page and e-mail data
  - For example, time spent on web pages, web pages visited during a session, page from which the visitor came to our web pages and links opened in INVL Life e-mail letters.

## 9 Rights of the data subjects

You have the right to access your personal data processed by INVL Life, the right to rectify the data and, when the conditions are fulfilled, the right to erase the data, the right to restrict or object to the processing of personal data, as well as the right to transfer the data elsewhere and the right to make a complaint to the appeal body. To learn more about your rights and how to use them, please see INVL Life privacy policy.