Unum UK
The General Data Protection Regulation (UK GDPR)

Unum is an employee benefits insurance provider and acts as a Data Controller to arrange and administer insurance policies, including the processing of individual claims.

We comply with UK GDPR, based on the ICO's recommended 12-step approach. We ensure we fulfil our responsibilities as a data controller by:

- Only collecting what personal data is needed and making sure the flow of data through Unum's business processes is controlled and used only for the purpose of delivering the prescribed service, data is only processed and stored in appropriate locations, and access to all data is limited to only those who require it as part of Unum's legitimate business activities
- Having appropriate documentation and procedures are in place across all business areas, particularly to respond to all Individual Rights requests under the UK GDPR, including Data Subject Access Requests
- Having appropriate security measures and procedures are in place to monitor and respond in the unlikely event of a security breach

We will let you know what information we need to provide a quote and ask you not to send any other personal data for this purpose. For example, we do not need employees' National Insurance numbers. Once cover is in place, we also use personal data to assess, process and administer claims, individual employee policy extensions and enquiries by insured employees.

In addition to our responsibilities to the Information Commissioners Office under UK-GDPR, Unum is authorised by the Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority (FCA) to ensure that we have appropriate systems and controls in place to protect our customers.

Data security

We take our responsibilities for protecting personal information seriously. Unum's information security sheet (UP3332) provides details of how we protect your data.

As the Insurance Provider and Data Controller, Unum is responsible for ensuring that it has the necessary technical and organisational measures in place to protect the Personal Data it holds in delivering its insurance products. We do not complete data security questionnaires due to the sensitive commercial nature of these. We do acknowledge however the need for employers to seek assurance on our procedures for handling personal data. We therefore make available, on request, a copy of our audited, independent SOC 2 report. This is updated annually.

Breach management

We have a robust internal process for monitoring, identifying and notifying data breaches within the prescribed timescales. This process also includes monitoring of arrangements with third parties. Where a breach is identified as being notifiable, we will advise you within 72 hours of us becoming aware of it.

Data retention

We only keep personal data for as long as necessary for the purpose(s) that it was provided for. Typically, this is for a maximum of 7 years after the conclusion of a policy or final settlement of an individual claim. After this time, unless an exemption applies which allows us to keep it for longer, we will ensure that the relevant personal data is securely deleted.

We scan all paper records and update electronic records. Paper records are held securely for 3 months and then destroyed.

Individual rights

We are committed to ensuring we advise all customers of their individual rights and have established processes in place to comply with the UK GDPR's prescribed timescales.

While the majority of policies are issued in the name of the employer, we will notify individuals of their rights if they need to make a claim. Details of these rights are also available on our website at www.unum.co.uk/privacy-notice.

Third parties

Where arrangements are made with third parties, we ensure that contracts are in place and that due diligence is carried out on an ongoing basis to ensure that they apply the same standards of care and security we maintain as a Data Controller.

Processing and storing personal data

All of our insurance products are administered, hosted and stored in the UK. By exception, certain governance procedures require us to share data with our parent company, for example management information required for Group accounting purposes. In such instances data shared is typically aggregated or depersonalised and is fully covered by approved Model Clauses between us and our parent, Unum Group.

Data Protection Officer

Unum has an appointed Data Protection Officer who can be contacted through either:

Email: dataprotectionqueries@unum.co.uk

Post: Data Protection Officer, Unum, Milton Court, Dorking, RH4 3LZ

Unum UK Group entities registration with Information Commissioners Office

Entity	Registration number
Unum Select Ltd	Z2275307
Group Risk Insurance Services Ltd	Z9969038
Unum European Holding Company Ltd	Z2985352
Unum Ltd	Z6064013
Claims Services International Limited	Z5355064
National Dental Plan Limited	Z6725119

unum.co.uk

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