

# Unum UK

## Complying with UK GDPR

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### **Does Unum act as a Data Controller or Data Processor?**

Unum UK Group of Companies provides employee benefit insurance products. We are registered for such purposes with the Information Commissioner's Office as a Data Controller.

### **How do you demonstrate compliance with the UK GDPR?**

We have developed a Data Asset Register to record all business activities, the lawful basis for managing personal data and how this is stored.

### **How does Unum collect personal data?**

We receive data in a variety of ways, including from customers and suppliers. This information is only collected for legitimate purposes which are integral to the running of our business.

### **Do you keep records of which lawful processing conditions apply to your processing activities?**

The lawful basis for processing was identified during the data mapping phase of the UK GDPR programme. The lawful basis is also supported by various measures which include our Statutory Notices and consent notices, and data retention and disposal routines. We also conduct periodic reviews of business processes to assure compliance with this approach.

### **Do you have processes in place for your record-keeping activities – eg. breach reporting, processing activities, updating records?**

**Yes** – compliance is monitored through our Data Protection team, Risk, Compliance function and Internal Audit function.

### **Have your staff be provided with training on compliance with the UK GDPR?**

**Yes** – all staff have been provided with UK GDPR awareness training and our annual Data Protection and Information Security training programme has been updated to reflect the UK GDPR.

## **Do you notify clients immediately if you become aware of a data breach?**

**Yes** – our breach process has been reviewed to ensure that any notifiable breaches are actioned as soon as possible, and in any event, within the 72 hours of us being made aware of the breach.

## **What processes do you have in place for dealing with Individual Rights requests, eg Data Subject Access requests (DSAR)?**

Unum updated its Individual Rights Policy to cover all aspects of the legislation. All Individual Rights requests are directed to our Data Protection team at [dataprotectionqueries@unum.co.uk](mailto:dataprotectionqueries@unum.co.uk) to ensure that these are completed independently of the business area and within the one month statutory limit.

## **Do you have technical and organisational measures in place to protect personal data from accidental or unlawful destruction, loss alteration, unauthorised disclosure or access?**

**Yes** – we have strict controls over all our personal data use and these are continually reviewed to ensure that these provide the highest possible standards of protection.

## **Do you have a policy on conducting Data Privacy Impact Assessments (DPIA)?**

**Yes** – we have undertaken DPIA's on all business areas as part of our UK GDPR programme and have an agreed policy in place to be followed for any new business initiatives impacting data protection.

## **How will Unum ensure business partners are UK GDPR compliant?**

We have undergone a thorough exercise updating all relevant contracts with third parties to reflect UK GDPR requirements. Where third party business partners process information as a Data Controller e.g. medical consultants or app providers such as Square Health, this ensures that any such processing of personal data takes place in accordance with Data Protection Legislation under appropriate contractual terms and proportionate to the business need.

## **What is Unum's approach to record retention and data disposal?**

We control our use of personal information according to our Data Retention Policy which stipulates the period for which all data is retained and subsequently disposed of, for both the structured and unstructured systems and applications. There are also technology updates being introduced which support adherence to this policy.

## **Does Unum transfer data outside of the UK?**

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 but this is in aggregate or depersonalised formats and is fully covered by the UK/EU approved Model Clauses between us and our parent, Unum Group. In the event that a claim is received and information is required from outside the UK to support the claim we may transfer data to facilitate this and this will be subject to consent from the claimant and appropriate safeguards are put in place to protect the data.

## **Has Unum appointed a Data Protection Officer (DPO)?**

**Yes** – we have a designated DPO who can be contacted at:

**Address:** DPO, Unum Limited,  
Milton Court, Dorking,  
Surrey, RH4 3LZ

**Telephone:** 01306 887766

**Email:** [DataProtectionQueries@unum.co.uk](mailto:DataProtectionQueries@unum.co.uk)