Aetna Privacy Notice

This Notice of Privacy Practices (the “Notice”) applies to any processing of personal data conducted in connection with plans underwritten or administered by Aetna Global Benefits (UK) Limited, Aetna Insurance Company Limited and Aetna Health Insurance Company of Europe DAC (Ireland). 

This Notice covers processing during the entire insurance process, from quotation through any period of claims and processing after the termination of any policy. 

Aetna Global Benefits (UK) Limited, Aetna Insurance Company Limited and Aetna Health Insurance Company of Europe DAC (Aetna) are considered the controller for personal data processed in relation to health plans written under its insurance policies. 

Who does this Notice apply to?

- Plan members,
- Individuals members,
- Beneficiaries,
- Next of Kin,
- Other individuals whose personal data Aetna processes under the terms of its plans.

This Notice describes how personal data about you may be used, disclosed and how you can exercise your rights in relation to your personal data.

Please review it carefully.

When we use the term "personal data", we mean information that can directly or indirectly identify you as an individual.

This Notice was last updated in May 2022.

Why do we process your personal data?

Group Plans: 

- providing a quotation to a plan sponsor (e.g. the organization who has taken out insurance under which
- GR-67806-6 (10-16) AI

This Notice describes how personal data about you may be used, disclosed and how you can exercise your rights in relation to your personal data.
you will be provided insurance cover as part of a group plan, for example

- fraud prevention together with any other required regulatory checks,
- onboarding you onto the group plan to which you belong and registering you for its benefits,
- managing, administering and improving the policy of which you are a member,
- managing our information technology and to ensure the security of our systems,
- investigating, responding to and dealing with complaints or incidents relating to us or our business and maintaining service quality and training staff,
- contacting you with information about your plan,
- contacting you for the purposes of providing healthcare or wellness advice and information,
- processing and completing any claims you make under the policy,
- establishing, exercising and/or defending legal claims or rights and protecting, exercising and enforcing our rights, property or safety.

Before we process (use) your personal data we need to have a legal basis for doing so. This is often referred to as ‘the lawful basis for processing’ and there are specific grounds on which we can rely. We explain the lawful basis on which we process your personal data in the paragraphs below.

Where we receive personal data from a plan sponsor (i.e. the company applying to cover you under a group insurance plan), we will process your personal data as we have a legitimate interest in processing it. Our legitimate interest includes processing for the purposes of providing the plan sponsor with a quotation for cover and, where that quotation is accepted, for the purposes of onboarding and administering the group insurance plan. In any processing on this basis we have considered and balanced any potential impact on you and your rights and will only process the minimal personal data necessary for carrying out those actions.

It will be necessary to receive and hold your health information for dealing with your insurance, for example:

- arranging, underwriting and administering the insurance contract under which you benefit,
- administering a claim under the insurance contract, or
- exercising a right or complying with an obligation.

Where your health data is used for any of the above we rely on the insurance condition provided under UK law (Data Protection Act 2018) and the laws of Ireland (Data Protection Act 2018), which means we do not need to acquire your consent for the processing.

Individuals Plans:

- determining eligibility and providing a quotation to you or your broker,
- fraud prevention together with any other required regulatory checks,
- onboarding you onto the individual plan which you have requested and registering you for its benefits,
- processing payments/premiums under the plan which you have requested,
- managing, administering and improving the policy of which you are a member,
- managing our information technology and to ensure the security of our systems
- investigating, responding to and dealing with complaints or incidents relating to us or our business, to maintaining service quality and training staff,
- contacting you with information about your plan,
- contacting you for the purposes of providing healthcare or wellness advice and information
- processing and completing any claims you make under the policy.
Before we process (use) your personal data we need to have a legal basis for doing so. This is often referred to as 'the lawful basis for processing' and there are specific grounds on which we can rely. We explain the lawful basis on which we process your personal data in the paragraphs below.

Where we receive personal data from you, we will process your personal data for the performance of a contract with you including pre-contractual discussions with either you or your broker (if you have one), and subsequent contractual performance of the insurance plan together with processing any benefits to which you are contractually entitled.

It will be necessary to receive and hold your health information for dealing with your insurance, for example:

- arranging, underwriting and administering the insurance contract under which you benefit,
- administering a claim under the insurance contract, or
- exercising a right or complying with an obligation.

Where your health data is used for any of the above we rely on the insurance condition provided under UK law (Data Protection Act 2018) and the laws of Ireland (Data Protection Act 2018), which means we do not need to acquire your consent for the processing.

How do we obtain your personal data?

**Group Plans:**
- we get some personal data from your plan sponsor when they request an insurance quote from us, and we retain that information after any quote has been accepted and they start the group plan with us. This information includes your name, date of birth and country of residence.
- We do not process your information for any other purpose unless you submit a claim under the policy (see above).

**Individual Plans:**
- where you have taken out an individual insurance plan with us, we will have received your personal data either directly from you or from an insurance broker that you instructed.
- We may also receive some personal data from other insurers, brokers, third-party administrators (TPAs), and health care providers.

Personal data you provide about other people

If you provide personal data about other people you must ensure that you have informed those individuals that you will be sharing their information with us and that the information will be lawfully processed for the purposes set out in this privacy notice.

For how long do we retain your personal data?

We retain your personal data for as long as necessary to provide you the benefits under your insurance plan, until such time as any claim under the insurance policy is concluded, until the limitation for exercising any legal rights has expired or for compliance with any legal or regulatory requirements.

Please note that we do not automatically destroy information about you when you terminate your coverage with us. It may be necessary to use and disclose this information, for legal and regulatory reasons, even after your coverage.

GR-67806-6 (10-16) AI3
Do we share your personal data with other organisations?

Group and Individual Plans:

- **Health Care Operations:**
  - Plan Administration
  - Research
  - Business Associates
  - Industry Regulation
  - Law Enforcement
  - Legal Proceedings
  - Public Welfare

- **Disclosures to Other Covered Entities:**
  - Additional Reasons for Disclosure:

- **Treatment:**

- **Disclosure to Others Involved in Your Health Care:**
relative, a friend, the employer, the subscriber of your health benefits plan or any other person you identify, provided the Information is directly relevant to that person’s involvement with your health care or payment for that care. For example, if a family member or a caregiver calls us with prior knowledge of a claim, we may confirm whether or not the claim has been received and paid. You have the right to stop or limit this kind of disclosure by calling the Member Services number on your ID card.

Uses and Disclosures Requiring Your Written Authorization: In all situations other than those described above, we will ask for your written authorization before using or disclosing Information about you. For example, we will get your authorization:

- For marketing purposes that are unrelated to your benefit plan(s), and
- For other reasons as required by law.

If you have given us an authorization, you may revoke it at any time, if we have not already acted on it. If you have questions regarding authorizations, please call the Member Services number on your ID card.

Sending your personal data abroad

There are occasions where we need to send your personal data, including health information, outside of the United Kingdom (UK) or the European Economic Area (EEA). Organisations that we may send your personal or health data to include:

- Other organisations within the Aetna group for the purposes of corporate administrative, regulatory reporting, dealing with complaints or seeking legal advice. We have appropriate contractual protections (known as model contract clauses) in place with other group companies that receive your personal data. You can request copies of these model contract clauses by contacting the Data Protection Officer at the details provided below.
- Providers of health care, where you make a claim under the insurance. This may include medical information for the purposes of an organization providing health care to you when you are overseas.

We will not send any personal data or health information outside the UK or EEA unless the appropriate protections are in place, or unless there are emergency medical grounds for doing so.

Profiling and Automated Decisions

We do not conduct any profiling or automated decisions, other than in circumstances where you are expressly informed.

Your rights in connection with personal information

- Request access to your personal information (commonly known as a “data subject access request”).
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate personal data we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
• Request the restriction of processing
  This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

• Request the transfer of personal information
  If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer (DPO).

Right to object to us processing your personal data

You have the right to object to us processing your personal information where we are relying on a 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. To exercise your right to object you should write to the Data Protection Officer by using the contact details below.

Contact Us:

If you would like to exercise any of your rights relating to your personal data, or require any further information, please contact our designated Data Protection Officer:

Data Protection Officer
25 Templer Avenue
Farnborough Hampshire
GU4 6FE

OR
dpo@aetna.com

Individuals in the EEA

We have appointed Aetna Health Insurance Company of Europe DAC to be our data protection representative within the EEA. Their contact details are:

• Alexandra House, The Sweepstakes, Ballsbridge, Dublin 4, Ireland;
or
• dpo@aetna.com

Individuals within the EEA can contact us directly (see contact details above) or contact our European representative.

Where you disagree with any aspect of handling of your personal data, and we are unable to resolve those concerns, you have the right to complain to the relevant supervisory authority.

The UK supervisory authority is the Information Commissioner’s Office (ICO) and can be contacted on their helpline 0303 123 123 or via their website at www.ico.org.uk.

The Supervisory Authority for the EU is the Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland.
Aetna’s Legal Obligations

Privacy regulations require us to keep Information about you private, confidential, secure, and to give you notice of our legal duties and privacy practices.

Safeguarding Your Information

We guard your information with administrative, technical, and physical safeguards to protect it against unauthorized access and against threats and hazards to its security and integrity.

This Notice is Subject to Change

We may change the terms of this Notice and our privacy policies at any time in accordance with applicable law or due to a change of circumstances. If we do, the new terms and policies will be effective for all of the Information that we already have about you, as well as any personal data that we may receive or hold in the future.