



UK Insurer Frequently Asked Questions (FAQs)

1.

When did UnitedHealthcare Global become authorised as a UK Insurer?

- On 1 Jan 2022, we were authorised as a UK insurer.
- UnitedHealthcare Insurance dac is an Irish insurer authorised and regulated by the Central Bank of Ireland (CBI).
- As a UK insurer, UnitedHealthcare Insurance Designated Activity Company, UK Branch, (the 'Company') is also authorised by the Prudential Regulation Authority in the UK and subject to regulation by the Financial Conduct Authority and limited regulation by the Prudential Regulation Authority.

2.

What happens now the Company is authorised as a UK Insurer?

- The Company will conduct its UK business through its UK branch.
- Where applicable, policyholders and insured members will have access to the UK Financial Ombudsman Service and the UK Financial Services Compensation Scheme.
- From a practical perspective, there is no change as the Company was previously in the Temporary Permission Regime and has now obtained authorisation.

3.

Will we need to change our contracts as a result of the authorisation?

- Our previous Terms of Business Agreements (TOBAs) with UK brokers will in time be updated to reflect they are entered into with the UK branch and the business they are covering.
- Client agreements and member packs will also be updated to reflect the change to the UK branch.
- We will contact clients and brokers to issue new agreements as required. This may occur at renewal or at another period depending on specific arrangements on renewal or through amendment to existing agreements.

4.

How will the branch operate?

The UnitedHealthcare Global UK branch has a branch management structure based in the UK. The UK branch consists of a UK based team covering Head of Branch, Compliance Officer, sales, client management and sales support and shared services will be provided to support the UK branch from the Company's Irish HQ.

5.

How will insurance premium tax be handled?

The position in relation to Insurance Premium Tax (IPT) will not change. IPT will be applied based on the location of members and collected by the UK branch and remitted to the relevant tax authorities.

6.

Will GDPR continue to apply in the UK, and how are data transfers impacted?

- On January 1 2021, GDPR ceased to have direct effect in the UK. However, because the UK is committed to maintaining an equivalent data protection regime, a UK version of GDPR applied from that date (UK GDPR).
- The UK GDPR is substantially similar to GDPR and the key principles, rights, and obligations remain the same. However, there is the potential for future divergence between the two.
- Personal data can continue to flow freely from the EEA to the UK (with a limited exception for certain immigration data) because the EU Commission adopted adequacy decisions about the UK. The EU adequacy decisions are expected to last until June 27, 2025 and will be subject to ongoing review to ensure the UK continues to provide an appropriate level of data protection.

- Personal data can also continue to flow freely from the UK to the EEA. The UK government has stated that transfers of personal data from the UK to the EEA are permitted without the need for Standard Contractual Clauses or some other GDPR transfer mechanism. This position will likely be subject to ongoing review.
- The Company is taking all necessary steps as it relates to data transfers and GDPR/UK GDPR compliance.
- From a practical perspective, Brexit and the UK GDPR did not have a material privacy impact as it relates to the services that Company provides to its clients.

7.

Can we pay commissions to UK brokers for EEA business incepted prior to 1 January 2021?

We are able to pay commission to UK brokers for EEA business (contracted with an EEA policyholder) incepted prior to 1 January 2021 – the end of the Transition Period. Following this date, EEA business cannot be intermediated by a UK broker unless an EEA branch or subsidiary is used. We are not able to pay commission for any new EEA business or EEA renewals intermediated by a UK broker after 1 January 2021 unless an EEA branch or subsidiary is used.

Similarly, an EEA broker is not able to intermediate UK business after 1st January 2021 unless a UK branch or subsidiary is used or the broker avails of rights under the Temporary Permissions Regime.