



# Privacy notice

This privacy notice is intended to explain how and for which purposes we use your personal data. Please read this privacy notice carefully.

## 1. Identity and contact information of the personal data controller

**Generali osiguranje d.d.,**  
**Ulica grada Vukovara 284, 10000 Zagreb,**  
**PIN (OIB): 10840749604**  
telephone: +385 (0)1 4600 400,  
telefax: +385 (0)1 4600 600,  
e-mail: info.hr@generali.com  
*(The data controller is a natural or legal person determining the purpose and means of personal data processing.)*

## 2. The purpose of personal data processing

We process personal data for the purpose of conclusion and performance of insurance contracts – specifically for assessment of insurance risk, collection of receivables, amendments of policies as well as for the purpose of settlement of indemnification and recourse claims in an amicable dispute resolution and litigation. We process personal data for the purpose of protection of our legitimate interests in order to detect and prevent fraud and attempts of fraud and other crimes and minor offences in cases of conclusion of an insurance contract in cases of resolution of indemnification and recourse claims in amicable dispute resolution or litigation as well as in cases where conclusion of an insurance contract is declined. We process personal data for the purpose of achieving our legitimate interests with the purpose of direct marketing in order to send you information about our insurance products, about benefits, for the purpose of service satisfaction surveys, as well as for the purpose of market research.

### Legal basis for the processing:

Legal basis for processing of your personal data for the above purposes is conclusion

and performance of insurance contracts, compliance with legal requirements applicable to Generali osiguranje d.d., protection of our legitimate interests, and in some cases the legal basis for processing of your personal data is your specific consent.

## 3. Categories of personal data we process

We process personal data necessary for the aforementioned purposes:

**Identification and contact data:** Name and surname, gender, domicile or residence, date and place of birth, personal identification number (PIN (OIB)), number, name and country of issue of the personal identification document, data on nationality, data on the country of tax obligation and your tax number, information on the status of a politically exposed person, information on your employment, data contained in registry record excerpts, e-mail address, telephone number, and fax number. In some cases we collect data on your family relations, and information on your membership in a chamber, association, etc.

### Financial information and account details:

Bank account number or credit card number and account details. In cases of collateral of an insurance contract, we process data on the number and amount of your loan and the name of the credit institution.

**Special categories of personal data:** In some cases, we process data on your trade union membership, data on your level of disability for the purpose of receiving certain benefits upon conclusion of an insurance contract solely on the basis of your consent which may be given by means of your declaration or a clear



affirmative action (such as providing evidence of trade union membership and/or evidence of degree of disability).

In cases of conclusion of an accident insurance contract, a property insurance contract with additional coverage for provision of telephone health consulting services (Halo doktore), a business interruption insurance contract, a loan user insurance contract, we process data concerning health. In cases of conclusion of a life insurance contract, we process data on your height and weight, your sports activities, as well as data pertaining to your health.

Depending on the object of damage, in some cases we process data on your health. Besides, in some cases, we process data on criminal or civil proceedings in which you are a party in the course of processing of indemnification and/or recourse claims in amicable dispute resolution or litigation proceedings as well as in procedures aimed at preventing, detecting and investigating fraud or other acts related to the field of insurance and damage compensation.

**Telephone recordings:** Recordings of telephone calls to our call centre (calls placed to our agents).

**Data used for the purpose of investigative and/or other procedures:** Data required for investigative and/or other procedures related to perpetration of criminal or minor offences in the field of insurance as well as realisation of legal claims arising from insurance contracts.

**In addition to the above, we process data necessary for concluding individual insurance contracts:**

In cases of property insurance contracts, we process data on the description, location, value and ownership of items.

- In cases of motor third party liability insurance contracts, motor hull (motor casco) insurance contracts, we process data on vehicle description, value and ownership, vehicle registration number, and VIN number.
- In cases of contracts on insurance of rail, air, and maritime means of transport and liability arising from use of the same, as well as transport risks, we process data on the description, value, ownership, registration number, hull number or serial number of the

means of transport.

- In cases of contracts on insurance of users of loans, we process data on the number of your credit contract, approved amount of credit and the currency, amount of the monthly annuity, number of monthly annuities, a declaration of the policyholder and the insured person with a health certificate.
- In cases of travel health insurance contracts, we process data on the concluded travel contract and/or purchased travel ticket or booked accommodation.
- In cases of life insurance, in some cases we process data on the amount of personal income, data contained in the decision on pension, as well as data contained in the decision on inheritance.

**In addition to the above, we process data needed for performance of individual contracts and/or processing and deciding on damage and recourse claims in amicable resolution or litigation processes:**

Data on the object which suffered damage and/or data needed to determine the scope and amount of the damage: registration plate of the vehicle, vehicle identification number, vessel hull number, medical documentation and payroll documentation (amount of personal income), decision on retirement (amount of pension), decision on inheritance, financial documentation of legal person with personal data (tax decisions, balance sheets, etc.), data on credit amount, and data found in excerpts from registry records.

#### **4. When personal data is not obtained directly from the person whose data is processed**

We process personal data necessary for the aforementioned purposes even if it is not directly collected from the person concerned – which were obtained from the policyholder, the insured person, the beneficiary or an injured party: We process personal data necessary for the aforementioned purposes and specified under item 3 of this Privacy Notice.

#### **5. Recipients and categories of recipients of personal data**

We may submit personal data to other



companies within the Generali Group, to other correspondent companies outside the Group, authorised agents, as well as other persons in a business relation with Generali osiguranje d.d. for the purpose of performance of insurance contracts, processing of indemnification and recourse claims in the process of amicable settlement or litigation proceedings such as healthcare institutions, appraisers, entities providing help and assistance, legal representatives. Personal data may be submitted to competent state authorities, associations and organisations such as Croatian Financial Services Supervising Agency, Croatian Insurance Bureau and other state authorities for the purposes of due diligence and reporting and for the purpose of prevention of tax fraud and tax evasion as well as to comply with other obligations and/or Insurer's legal interests.

#### **6. Why is it necessary to provide your personal data**

It is necessary to provide your personal data to conclude and perform insurance contracts and if you fail to provide the information necessary for a particular type of insurance contract, we shall be unable to conclude the insurance contract. Providing information on your trade union membership is not a requirement for conclusion of a contract, but a basis to obtain certain benefits which you may receive upon conclusion of the insurance contract. The data on your trade union membership is collected solely on the basis of your consent which may be given by means of your declaration or a clear affirmative action (such as providing evidence of trade union membership).

#### **7. Details on our intention to transfer personal data into a third country and information on whether a decision on appropriateness exists**

In some cases, personal data is transferred to service providers located outside the European Economic Area (EEA). In such cases, transfers of personal data shall only take place if the European Commission has confirmed that the third country complies with a specific level of data protection or if there are appropriate protection measures in compliance with the applicable law (e.g. mandatory corporate rules, standard contractual clauses). You are entitled

to obtain information and, if relevant, a copy of the security measures adopted for the transfer of personal data outside the EEA by contacting the Data Protection Officer.

#### **8. Rights in relation to personal data**

You have the following rights in relation to your personal data:

Right to access – You may request access to your personal data and a certificate specifying if your personal data is being processed.

Right to rectification – You may request Generali osiguranje d.d. to rectify personal data which is inaccurate or to supplement incomplete personal data.

Right to erasure (right to be forgotten) – You may request Generali osiguranje d.d. to erase your personal data if one of the following conditions has been met:

- a. The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
- b. You have withdrawn your consent on which the processing is based and if there is no other legal ground for the processing.
- c. You object to automated decision-making and there are no overriding legitimate grounds for processing or you object to processing for the purposes of direct marketing.
- d. Personal data have been unlawfully processed.
- e. Personal data have to be erased for compliance with legal obligations based on the European Union law or the law and regulations of the Republic of Croatia.

Right to restriction – You may request Generali osiguranje d.d. to restrict the manner in which it processes your personal data if one of the following conditions has been met:

- a. You contest the accuracy of your personal data, for the period enabling Generali osiguranje d.d. to verify the accuracy of your personal data.
- b. The processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead.
- c. Generali osiguranje d.d. no longer needs

the personal data for the purposes of the processing, but it is required by you for the establishment, exercise or defence of legal claims.

- d. You object to the processing on the basis of the right to object to automated decision-making until verification that our legitimate interests override your interests.

If you requested restriction of processing, Generali osiguranje d.d. shall inform you before the restriction of processing is lifted.

Right to portability – You may request Generali osiguranje d.d. to transfer personal data with which you provided us to another data controller and/or request receipt of your personal data in a structured, usually used and machine-readable format.

In cases where such personal data processing is based solely on a special consent:

Right to withdraw the consent – You may withdraw your consent for the processing of your personal data at any time.

Right to object to processing – You may object to processing of your personal data by Generali osiguranje d.d. for direct marketing purpose or, in another situation in accordance with regulations of the Republic of Croatia, by giving notice to the Data protection officer.

## **9. Right to lodge complaints to the supervising body**

You have right to lodge a complaint with the supervising body. The supervising authority's contact information is:

Croatian Personal Data Protection Agency,  
Martićeva ulica 14, 10000 Zagreb

## **10. Period in which your personal data shall be stored**

Your personal data provided by you as a client for the purpose of conclusion and performance of an insurance contract are retained for as long as necessary for achievement of the purpose for which we process them. The criteria we apply for determination of that period is specifically the purpose of collection, duration of the insurance contract, statutory limitation of claims or specific provisions of other legislation

requiring us to retain data for a specifically determined period.

## **11. Automated decision-making including profiling**

We process your personal data using means of automated decision-making (e.g. in cases of conclusion of insurance contracts when using the web shop). Sometimes we use your data for profiling purposes, e.g. when assessing previous claims-related experience in order to decide on the amount of insurance premium or for the purpose of direct marketing to allow us to better determine products that fulfil your needs.

## **12. Data protection officer**

Data protection officer's contact information:

Address:  
Generali osiguranje d.d.,  
Ulica grada Vukovara 284, 10000 Zagreb,  
for the Data protection officer

e-mail:  
zastita\_osobnih\_podataka.hr@generali.com

Telephone: + 385 1 4600 400