



Privacy Notice - Insurance Products and Services

Generali osiguranje d.d. processes your personal data.

The information on the processing and protection of personal data contained in this notice refers to legal relationships with natural and legal persons relating to products and/or services of Generali osiguranje d.d., which is part of the Generali Group.

We care about your privacy and the security of the personal data we collect and process. The purpose of this notice is to provide you with basic information about the processing of your personal data. Please read this privacy notice carefully.

A) General and contact information

1) Data Controller

Data Controller is the natural or legal person who determines the purposes and means of the processing of personal data and is responsible for the lawfulness and security of the processing of personal data.

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Address:

Generali osiguranje d.d.

Slavonska avenija 1b, 10000 Zagreb

for Data Protection Officer

E-mail: zastita_osobnih_podataka.hr@generali.com

3) Personal Data Protection Agency (AZOP)

The Personal Data Protection Agency is an independent supervisory body which monitors lawfulness of personal data processing and the fulfilment of all other rights and obligations in the field of personal data protection in the Republic of Croatia.

2) Data Protection Officer (DPO)

Data Protection Officer is the person you can contact in case of a request to exercise your rights or any other inquiries in relation to the processing of personal data.

Personal Data Protection Agency

Selska cesta 136, 10000 Zagreb

Phone: 00385 (0)1 4609-000

Fax: 00385 (0)1 4609-099

E-mail: azop@azop.hr

Web: www.azop.hr

B) Details of the processing of personal data

1) Purposes of personal data processing

We process personal data for the purpose of **concluding and executing insurance contracts**, i.e., for taking certain actions at your request before concluding an insurance contract, such as making an informative calculation or an insurance offer.

The processing of personal data is necessary for us to be able to execute the insurance contract and other related activities, such as:

- insurance risk assessment,
- determining your insurance needs and requirements,
- activation of electronic communication service (e.g., sending and receiving documentation via e-mail),
- changes in insurance policies,

- payment of insured amounts and processing of claims and reimbursements,
- collection of insurance premiums and other types of owed amounts,
- responding to your questions, objections, complaints, requests and all other forms of inquiries,
- various types of administrative activities, such as bookkeeping, accounting, conducting business analyses and business reporting.

In addition to concluding and executing insurance contracts, we process personal data for **the purpose of complying with applicable legal obligations** prescribed by the provisions of applicable legislation, such as the Civil Obligations Act and the Insurance Act, such as the obligations to combat financial crime, i.e., the fight against money laundering and terrorist financing, the application of international sanctions, the fight against bribery and corruption, the protection of competition, compliance with tax obligations and the submission of personal and other business data to the competent authorities.

We also process personal data **for the purposes of our legitimate interests or the legitimate interests of third parties**, such as:

- detecting and preventing fraud, embezzlement and other misdemeanours or criminal offences,
- establishing, exercising or defending legal claims in judicial, administrative or other legal proceedings,
- managing the insurance portfolio and improving our products and services,
- satisfaction surveys about products or services provided and market research,
- direct marketing to inform you about our insurance products and various benefits.

In some cases, **we process personal data based on your consent** to the processing of personal data, e.g., when participating in prize contests or humanitarian activities. You can give your consent in the form of an explicit statement or a confirmation action by which you give your consent to the processing of personal data (e.g., by clicking on the area provided for this purpose when using the services of the webshop). When requesting consent, we will also inform you about the purposes of processing personal data for which we are requesting consent. Withdrawing or refusing to give consent does not adversely affect the insurance contract or the quality of the products and services we offer you.

2) Categories of personal data

The different categories of personal data we collect primarily depend on the insurance activity we perform and the type of insurance for which you conclude a contract, and generally include the following:

- identification data (e.g., name, surname, personal identification number, health insurance number, gender, date and place of birth, citizenship, membership in a chamber, association, club or other types of association),
- information about the personal identification document (e.g., name and number of the document, country of issuer, period of validity, copy of the document),
- location data (e.g., address of permanent/temporary residence),
- contact information (e.g., telephone number, e-mail address),
- data contained in documents from state registers (e.g., information on kinship, excerpt from the register of births, deaths and marriages),
- financial and related information (e.g., account number, bank card number, loan amount and currency, amount and number of monthly annuities, and other loan information),
- education data (e.g., title, level of education, name of educational institution),
- employment data (e.g., job title, employer name, employment contract data),
- information about the property and/or object of insurance contract (e.g., license plates, chassis number and other vehicle data, location, value, ownership and other information about the property, type, model, mark, flag state and other information about the vessel),
- data on the insurance contract (e.g., insurance policy number, premium amount, insurance duration),
- information about the harmful event or in connection with the claim (e.g., date, time and place of the occurrence of the harmful event, type and amount of damage),
- communication data (e.g., e-mail communications, recordings of telephone calls)
- data processed for the purposes of preventing money laundering and terrorist financing (e.g., country of tax residency, political exposure),
- special categories of personal data (e.g., racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, data on sex life or sexual orientation).

3) Categories of persons whose data we process

Depending on the type of insurance, loss event, claim and other circumstances, we process personal data of:

- policyholders,
- insured persons,
- insurance beneficiaries,
- injured parties,
- claimants,

Depending on the individual circumstances, we also process the personal data of relatives, proxies, guardians and legal representatives of these persons.

4) Data source

We collect personal data directly (when we collect personal data directly from the person to whom it relates) or indirectly (when we collect personal data from other persons or from other sources).

We primarily collect data directly from the policyholder, but depending on the circumstances, we also collect data indirectly (e.g., data on a family member or insured person that we collect from the policyholder, data on injured parties that we collect from claimants, data we collect from other insurance companies, competent authorities, appraisers and other business partners, or data we collect from publicly available sources).

5) How we process data and who has access

We process personal data in physical and digital form, i.e., in the form of paper documentation and using digital systems and applications.

We care about the security of the personal data we process and therefore limit access to data to persons who require the data for performance of the purpose of data processing (e.g., our employees, data processors or joint controllers).

Data Processors are our business partners, i.e., natural or legal persons who process personal data on our behalf and in accordance with our instructions when providing various business services, such as insurance distributors, appraisers, providers of assistance and assistance services, and providers of IT or marketing services.

Joint controllers are data controllers who have jointly determined the purposes and means of processing (e.g., business partners who have jointly determined how and which data will be processed within the framework of their business cooperation). In certain cases, we process personal data as a joint controller within the framework of business cooperation with our business partner, such as:

- concluding a co-insurance contract where together with another insurance company or companies we insure a certain risk,
- cooperation with individual banks with which we have concluded an insurance distribution agreement within which the insurance product is linked to the bank's product.

We do not provide or disclose personal data to third parties unless it is necessary for the conclusion or

performance of an insurance contract, compliance with applicable legal obligations, legitimate interest or for other legitimate reasons, such as the provision of data:

- third parties based on your consent,
- other entities that are members of the Generali Group,
- Croatian Insurance Bureau and other insurance companies,
- insurance or reinsurance undertakings in the case of co-insurance or reinsurance,
- hospitals, pharmacies and other health care facilities.
- Ministry of Internal Affairs, courts or notaries public for the purpose of conducting court or other legal proceedings,
- Ministry of Finance and the Office for the Prevention of Money Laundering,
- public authorities such as the Croatian Financial Services Supervisory Agency or the AZOP.

6) Automated decision-making

Sometimes we process personal data entirely by automated means that produce legal effects for you, such as concluding an insurance contract through a "webshop" where an insurance contract is usually concluded and insurance policy issued without participation of a person which manually processes personal data.

7) Data retention period

The retention period of personal data depends on the purpose for which the data was collected, primarily on the type and duration of the insurance contract, the processing of claims, statute of limitations and the provisions of applicable legislation.

We retain collected personal data for the purpose of concluding an insurance contract for the duration of the insurance contract and for at least 11 years after expiration of the insurance contract.

8) International transfers to third countries or international organisations

We process personal data within the territory of the Republic of Croatia, i.e., the territory of the European Union and the European Economic Area (EU/EEA).

However, in certain cases, we transfer personal data to third countries or international organizations for processing, e.g., for the purpose of reinsurance or for the processing of claims where the loss event occurred on the territory of a third country. In these cases, the transfer of personal data is based on a decision by the European Commission that a third country or international organisation ensures an adequate level of

protection or on the basis of appropriate security measures that we have provided for such transfer.

C) Rights regarding personal data processing

All persons whose data we process have certain rights regarding processing of personal data, which can be exercised at any time by contacting our Data Protection Officer.

You can exercise the following rights regarding data processing.

Right of access - you can contact us at any time to find out if we are processing your data. If we process your data, you have the right to access your data, the right to information about data processing and the right to a copy of the personal data we process.

Right to rectification - you have the right to correct inaccurate and complete incomplete data that we process.

Right to erasure - you have the right to request the deletion of the data we process if there is no longer a lawful basis for further processing.

Right to restriction of processing - you have the right to request the restriction of processing of personal data if one of the following is met:

- a) you contest the accuracy of your personal data for a period that allows us to verify the accuracy of that data,
- b) the processing of the data is unlawful, but you oppose the deletion and instead request the restriction of the processing of that data,
- c) the data is no longer necessary to achieve the purpose for which you provided it, but you are requesting it to establish, exercise and defend legal claims,
- d) you have objected to the processing and request the restriction of processing until the objection is resolved.

Right to data portability - if data processing is based on consent or is carried out by automated means, you

have the right to request the transmission of your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request that we transmit it directly to another data controller where technically feasible.

Right to object - if the data processing is based on a legitimate interest or is carried out by automated means, you have the right to object to such processing. We will not process your personal data after you have objected, unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims. If you have objected to data processing carried out for direct marketing purposes, we will no longer process your data for this purpose.

Right to complain - if you think that we have violated the provisions of the General Data Protection Regulation (GDPR) by processing your personal data, you can file a complaint with our Personal Data Protection Officer, the Personal Data Protection Agency (AZOP) or another supervisory authority in charge of personal data protection in the European Union (EU).

Right to withdraw consent - if data processing is based on consent, you have the right to withdraw consent at any time, however, the withdrawal of consent does not affect the lawfulness of processing based on consent before withdrawal.

The right not to be subject to a decision based solely on automated processing that produces legal effects for you, unless such processing is necessary for the conclusion or performance of a contract with you, if it is permitted by applicable legislation or is based on your consent.