



Poistovňa

Union poisťovňa, a. s.
Karadžičova 10
813 60 Bratislava
IČO: 31322051
DIČ: 2020800353
Spoločnosť zapísaná v obchodnom registri
Okresného súdu Bratislava I, odd. Sa, vl. č. 383/B

Basic information on personal data protection for the data subject

Intended for potential clients, clients (insured, policyholders), indemnity beneficiaries, aggrieved parties from an insured event

1. The purpose of this information is to provide you (**the “data subject”**) an answer to why we process your personal data, how we process it, and what your rights are in relation to the processing of your personal data. **This information applies to you in case you are our potential client, client (insured, policyholder), indemnity beneficiary in the case of death of an insured person, aggrieved party from an insured event.**

2. The **data controller** is Union poisťovňa, a. s., Karadžičova 10, 813 60 Bratislava, Slovak Republic, Corporate ID no.: 31322051, entered in the Commercial Register of Bratislava I District Court, Section: Sa, entry no. 383/B (hereinafter also referred to as “we” or “our company”).

3. Our **data protection officer** is the Legal & Compliance Section Head, the address for delivery of documents is the same address of our registered office, the e-mail address is: dataprotection@union.sk

4. Our company processes your personal data primarily for the purpose of performing insurance and reinsurance activity, though your data is also processed for other purposes – see the attached overview.

Purpose of processing your personal data	Legal basis for processing your personal data
Performance of insurance and reinsurance activities. The performance of insurance activities includes, for example, the fulfilment of our obligations in the framework of precontractual relationships, entering into insurance policies, administration of insurance policies, processing insurance claims, provision of assistance services, documenting our activity.	The legal basis for processing your personal data is Article 6(1)(b) and (c) and (f) of the GDPR Regulation, Act no. 39/2015 Coll. on insurance and on the amendment of certain acts, as amended, and other relevant legal regulations. This means that your consent is not required for processing of your personal data. The provision of personal data not indicated as optional is necessary for concluding an insurance policy, or for providing indemnity from a policy (e.g. insurance indemnity, provision of assistance services), and in the case of their non-provision it is not possible to conclude the insurance policy, or provide indemnity. ¹
Fulfilment of our statutory duties – e.g. bookkeeping, registry administration, providing cooperation to public authorities	The legal basis for processing of your personal data is Article 6(1)(c) of the GDPR Regulation. This means that your consent is not required for processing of your personal data.
Handling of complaints	The legal basis for processing of your personal data is Article 6(1)(b) and (c) of the GDPR Regulation. This means that your consent is not required for processing of your personal data.
Preventing and detecting money laundering and terrorist financing	The legal basis for the processing of your personal data is Article 6(1)(c) of the GDPR Regulation, Act no. 297/2008 Coll. on protection against money laundering and terrorist financing, and on the amendment of certain acts, as amended. This means that your consent is not required for processing of your personal data, since we are required to process your personal data in the scope according to the mentioned law for

¹ The list of personal data processed without consent is in an extent subject to § 78 of the Insurance Act: first name, surname, permanent address, temporary address, birth ID number, nationality, ID card type and number, contact telephone number, fax number and e-mail address and ID card personal data. In cases where other personal data is processed, such as the data concerning health status, such data is processed in the scope necessary for the risk assessment in concluding an insurance policy and for determining the extent of the obligation to provide insurance indemnity.

	the purposes of preventing and detecting money laundering and terrorist financing.
Prevention and detection of anti-social activity (fraud assessment).	The legal basis for processing of your personal data is Article 6(1)(c) and (f) of the GDPR Regulation. We carry out this processing in the interest of preventing and detecting any criminal and other undesirable antisocial activities. This means that your consent is not required for processing of your personal data.
Exercising our claims and defending our rights	The legal basis for the processing of your personal data is Article 6(1)(f) of the GDPR Regulation, in which we perform processing in the interest of proving, exercising and defending our legal claims. This means that your consent is not required for processing of your personal data.
Recording phone calls at our customer call centre	The legal basis for the processing of your personal data is Article 6(1)(f) of the GDPR Regulation in order that we can improve the quality of the service we provide you and that we can prove and defend our legal claims. This means that your consent is not required for processing of your personal data.
Marketing offers – offer of products, including profiling (targeted marketing offer), sending newsletters, competitions	The legal basis for the processing of your personal data is your consent (Article 6(1)(a) of the GDPR Regulation). You can withdraw your granted consent at any time, whereupon any appeal shall not have retrospective effects.
Direct marketing – informing our existing clients about news concerning their insurance policy and our products and services that they have or which are related to such products or services.	The legal basis for the processing of your personal data is Article 6(1)(f) of the GDPR Regulation (legitimate interest); we perform such processing in the interest of improving the quality and individualization of the services we offer you. You have the right to object to such processing at any time.
Satisfaction survey	The legal basis for the processing of your personal data is our legitimate interest (Article 6(1)(f) of the GDPR Regulation) in order that we can evaluate the quality of services provided with the aim of improving them and identifying our clients' needs. You have the right to object to such processing at any time.
Ensuring the security and functionality of web services Evaluating website visitor behaviour and personalising website content (especially cookies, IP addresses).	More information about such processing can be found on our website here: https://www.union.sk/vyuzivanie-cookies

5. We collect your personal data primarily from you, especially in the process of concluding the insurance policy and over the course of the insurance policy duration, e.g. in handling claims arising from an insured event. We may also collect your personal data from other entities, if necessary for fulfilling our obligations, e.g. from an aggrieved party, a healthcare provider, police and public authorities. We may, in accordance with the Insurance Act, also collect your personal data from other insurance companies in the framework of preventing insurance fraud.

6. Recipients of personal data

Your personal data may be provided, in particular, to:

- our sister company Union zdravotná poisťovňa, a.s., corporate ID: 36284831, and our parent company Achmea B.V., The Netherlands, corporate ID: 33235189;
- financial agents in the insurance or reinsurance sector;
- reinsurance companies;
- medical examiners;
- companies acting for and for the benefit of our company in connection with the exercise of rights arising under an insurance policy in relation to a policyholder;



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- companies providing services related to correspondence between our company and data subjects: Direct Marketing a.s., corporate ID: 31377793, Tatra Billing, s.r.o., corporate ID: 35810572, Zelená pošta s.r.o., corporate ID: 49529233;
- companies providing information technology services;
- the company that provides document digitization for our company: NUPSESO, a.s., corporate ID: 36525791,
- the company performing archiving center and registry administration: IRON MOUNTAIN SLOVAKIA, s.r.o., corporate ID: 36232734,
- the company that evaluates service satisfaction surveys: Metrixlab Nederland B.V. Rotterdam, The Netherlands, corporate ID: 59608838,
- our external auditor: PricewaterhouseCoopers Slovensko, s.r.o., corporate ID: 35739347,
- public authorities pursuant to applicable legislation.

If you have an insurance policy concluded for travel insurance and mountain rescue expenses insurance, an insurance policy for insurance of property and liability for damage to natural persons, the personal data stated in the insurance policy may also be provided to:

- the company providing assistance services Eurocross Assistance Czech Republic, s.r.o., corporate ID: 25598180.

If you have an insurance policy concluded for insurance of a motor or trailer vehicle, or an insurance policy on motor third-party liability insurance, the personal data stated in the insurance policy may be provided also to:

- in the case of an insured event, companies we cooperate with in handling insurance claims: TECHCAR Slovakia s.r.o., corporate ID: 36862592, AVUS Internationale Schadensregulierungen J Pscheidl & Dr. Pscheidl GmbH & Co KG, Blumauerstrasse 25/I., A – 4020 Linz, registered in the Register of the Regional Court in Linz under no. FN 22290 f.,
- the company Slovenská kancelária poisťovateľov, corporate ID: 36062235 in accordance with the provision of § 11(3) of Act no. 381/2001 Coll.,
- the company providing assistance services Eurocross Assistance Czech Republic, s.r.o., corporate ID: 25598180,
- a car service centre performing repair of damaged vehicles.

If you have an insurance policy concluded for insurance of oncological illness and the insurance Moje zdravie [My Health], the personal data stated in the insurance policy may be provided also to:

- the company MediGuide International, LLC, and Delaware USA Corporation, 162 Stone Block Row, Greenville, Delaware 19807, United States, which provides validation of the diagnosis and assessment of proposed treatment,
- the local partner of MediGuide International, which arranges communication between the insured, MediGuide International and a foreign clinic chosen by the insured from the offer, that checks the diagnosis and the proposed treatment,
- a specialised clinic chosen by the insured from the offer, and that checks the diagnosis and proposed treatment.

During the life of the insurance relationship, the companies listed above may change, whereupon you can find an updated list of these companies on our website.

7. Retention period for personal data

We keep personal data on our clients during the life of the insurance policy and after its expiry up to the lapsing of the limitation period for exercising rights ensuing from such insurance policy, though at least 15 years from the end of the contractual relationship. In the case that your personal data is associated with an insured event or handling of a complaint, then we process the personal data for 10 years from the time of closing the file.

We process personal data on our potential clients for a period of six months; in certain cases for a period of two years, unless you consent to longer processing.

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If you have granted us consent to use your personal data for marketing purposes, we use this personal data for the period specified in your consent, or until you withdraw your consent. We then keep your personal data for a period of a further five years from the date of their last use for this purpose.

We use your personal data for direct marketing during the life of the insurance policy, or until you object to such processing.

In the case that we engage you in a satisfaction survey, we will process the data collected in the framework of the survey for a period of three months.

8. Your rights as a data subject

If we process personal data about you, you have the following rights toward us:

- 8.1. The right to receive a confirmation on whether we process your personal data and if so, you have the right of access to this personal data together with the information stated in this guidance.
- 8.2. The right that we rectify your incorrect personal data and that we supplement any incomplete personal data on you.
- 8.3. The right to erasure of your personal data, if the data is no longer necessary for the purposes for which it was collected or otherwise processed.
- 8.4. The right to restrict processing of your personal data, if:
 - you contest the accuracy of your personal data, during the period of verifying such data;
 - the processing is unlawful and you object to the erasure of your personal data, and instead you request a restriction of its use;
 - we do not need your personal data for the purposes of processing, but you need them for proving, enforcing or defending claims.
- 8.5. The right to obtain the personal data relating to you and that you have provided to us, and also the right to transfer this data to another controller.
- 8.6. The right to object to the processing of your personal data by us.
- 8.7. The right to file a complaint with the Office for Personal Data Protection, if you believe that the processing of your personal data from our side is in contravention of legal regulations for personal data protection.
- 8.8. The right to file an objection with us and not to be subject to our decision which could produce legal effects for you and a significant impact, if such decision is issued solely on the basis of automated processing of personal data. You have the right to request us to review a decision issued by way of a method other than automated processing, whereupon we are obliged to comply with such request so that our staff will have a decisive role in reviewing the decision. We shall inform you on the manner of reviewing and result of the finding within 30 days of receiving your request.
- 8.9. The right to request proof of identity of the person responsible for collecting personal data.
- 8.10. If your personal data was not collected from you, you have the right to obtain information as to from what source your personal data originate, or information as to whether the data came from publicly accessible sources.

If you do not have full legal capacity, your rights may be exercised by your legal representative. If the data subject is not alive, his/her rights that he/she had under personal data protection law may be exercised by a close person.

You can exercise your rights in one of the following ways:

- a) in writing to the address of our registered office;
- b) at the e-mail address dataprotection@union.sk;
- c) in person verbally in minuted notes, from which it must be clear who exercised the right, what you are claiming and when and who drew up the minutes, his/her signature and your signature; you will receive a copy of the minuted notes;
- d) at the processor, whereupon the processor will then forward your request or the minuted notes to us for handling.



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9. Our company uses **automated tools for processing personal data** for the purpose of evaluating certain personal aspects of data subjects (profiling). Profiling means any form of automated processing of personal data consisting in the use of this personal data for evaluating certain personal aspects concerning a natural person, primarily analysing or predicting aspects of the data subject relating to his/her property, health, personal preferences, interests, reliability, behaviour, location or movement. The personal data of a data subject is thus processed primarily for the purposes of analysing the insurance risk or identifying potential insurance fraud, or for the purposes of protecting against money laundering and terrorist financing. In the case of a decision based solely on automated processing of personal data, including profiling, you have the rights referred to in point 8.8 of this document.

9. Personal data will not be published.

11. Transfer of personal data

Our company presumes that your personal data will be transferred to the above-mentioned recipients of personal data to within the European Union countries, countries that are signatories to the European Economic Area agreement and to Switzerland (to the entities referred to in point 6 of this information). We shall perform transfer of your personal data to third countries only if the European Commission has decided that these countries guarantee an adequate level of protection, or in the case where no such decision exists, then only if the data controller or data processor has provided adequate guarantees and at the same time if enforceable rights and effective legal remedies are available to you.