

GENERAL INFORMATION

UNIQA osiguranje d.d. (hereinafter: Company), having its registered office in Zagreb, Planinska 13 A, Zagreb, NIN: 75665455333, registered in the court register of the Commercial Court in Zagreb under the identification number of the subject of entry 080297140, further to the ruling of the Croatian Financial Services Supervisory Agency, is authorised to perform the activities of life and non-life insurance. In the performance of its registered activity, the Company processes personal data in conformity with all relevant laws and regulations.

Contact

Telephone: 01 6324 200

Telefax: 01 6324 250

Electronic mail: info@uniqa.hr

Web: <http://www.uniqa.hr>

AGENT FOR THE PROTECTION OF PERSONAL DATA

Further to the relevant regulations, the company has appointed the agent for the protection of personal data, whom you may contact should you have any questions regarding the processing of your personal data and your rights relating to the protection of personal data.

Contact

Telephone: 01 6324 200

Telefax: 01 6324 250 with reference NP DPO

Electronic mail: dpo@uniqa.hr

LEGAL GROUNDS AND PURPOSES OF COLLECTING PERSONAL DATA

The company determines the purposes and means of the processing of personal data and, in that sense, it is regarded as the controller of the processing of personal data.

Legal grounds for the processing of data may be divided into the following groups:

- **Taking actions at your request before the insurance contract is concluded**

It is your duty under law at the time the insurance contract is concluded to inform the company about any and all circumstances relevant for risk assessment that you know or that could not remain unknown to you. The conclusion of the insurance contract includes the processing of your data, so that we might:

- make an assessment whether the risk we are about to assume is acceptable for insurance, and under what conditions, and determine the amount of your insurance premium taking into consideration all relevant circumstances;
- process your offer, and draw up and provide you with your insurance policy;
- prepare an informative calculation.

- **Performance of the insurance contract**

Performance of the insurance contract requires the processing of your data in order to realise the rights and obligations of the parties arising from this contract, which includes:

- an assessment whether the insurance contract, and under what conditions, may be amended;
- resolving the claim for damages;
- making a decision on the existence of the right to payment of the insured amount;
- administration of the insurance contract;
- fulfilling your rights from the insurance contract, including collection of the insurance premium and recourse claims;
- ensuring that your data are accurate and up to date.

- **Performance of our legal obligations**

Your data shall be processed, so that we might perform our legal obligations, including, but not limited to:

- determining your needs and requirements before the conclusion of the insurance contract and, in the case of investment insurance products, verifying the appropriateness or suitability of the product for your specific circumstances;
- risk distribution via re-insurance or co-insurance to protect the interests of our clients and to perform the obligations assumed;
- resolving complaints and out-of-court dispute resolution;
- obligations set out in the Act on the Prevention of Money Laundering and Financing of Terrorism;
- obligations set out in tax regulations, such as the Accounting Act,

FATCA and CRS to ensure compulsory automated exchange of information on financial accounts, etc.;

- performing obligations set out with the aim of implementing the supervisory powers of Croatian and European supervisory bodies from within the competence of state authorities (Ministry of the Interior, competent state attorney's office, Tax Administration, etc.) and activities from within the competence of the Croatian Insurance Office;
- legally prescribed obligations for conducting audits.

- **Legitimate interests**

The processing of your data on the basis of the legitimate interests of the company is subject to special rules that enable you to submit an objection at any time, on the basis of your specific situation, to such processing and to the creation of a profile based on such processing. In that case, we shall no longer process your data on the basis of our legitimate interests, unless we prove that there are legitimate grounds for processing that prevail over your interests, rights and freedoms. If there are special rules with respect to your right to an objection, we shall specify them separately.

On the basis of its legitimate interests, the company shall process your data for the following purposes:

- preventing and detecting insurance fraud and fraud and embezzlement in general;

In the case of an objection to the processing of data for this purpose, we hold that the legitimate grounds for protecting the interests of the company, our clients, and the legal order prevail over your interests, rights and freedoms.

- submitting, realising or defending legal claims, regardless whether in court or administrative proceedings or any out-of-court proceedings;

In the case of an objection to the processing of data for this purpose, we hold that the legitimate grounds for protecting the interests of the company and our clients prevail over your interests, rights and freedoms.

- direct marketing that involves profiling and includes the promotion of products that the company offers on the market aimed at the contractual party during the contractual relationship;

In this case, if you object, we shall no longer process your data for this purpose.

- surveying your satisfaction with the service rendered;
- In this case, if you object, we shall no longer process your data for this purpose.*

- segmentation of clients, which involves profiling with the aim of granting additional benefits to clients that do not affect the conclusion or performance of the insurance contract;

In this case, if you object, we shall no longer process your data for this purpose, which may result in your inability to use additional benefits.

- **Legitimate interests of third parties**

The processing of your data shall be conducted for the purpose of preventing insurance fraud and fraud and embezzlement in general, on the basis of the legitimate interests of other insurance companies with which we exchange data for this purpose.

- **Your consent**

Your consent, which you may withdraw at any time, as the legal grounds for the processing of your data shall be used for the purpose of marketing that includes profiling on expiration of the insurance contract. Withdrawal of the consent shall not affect the lawfulness of the processing that was based on your consent before it was withdrawn.

The provision of personal data on the basis of the legal grounds for the taking of actions upon your request before the conclusion of the insurance contract, performance of the insurance contract, performance of our legal obligations, the legitimate interest of preventing and detecting fraud (including the legitimate interest of third parties) is a legal and contractual obligation and a condition required for the conclusion or performance of the contract. If you refuse to provide certain data, we shall not be able to perform our legal or contractual obligations, which will result in the inability to conclude or perform an obligation under the contract.

The provision of personal data on the basis of the legal grounds of the legitimate interest of direct marketing, surveying of your satisfaction, segmentation of clients, and your consent in terms of marketing is not a legal or contractual obligation and a condition required for the conclusion

or performance of the contract. If your refuse to provide certain data, this shall not affect the possibility of concluding or performing the contract.

TYPES OF PERSONAL DATA THAT WE PROCESS AND THE METHOD OF COLLECTING THEM

Personal data that we collect depend on the purpose of processing and the type of the insurance contract that you conclude or intend to conclude, or on the request for the realisation of rights arising from insurance. These are primarily data without which we cannot conclude or perform an insurance contract, including at least:

- basic personal data (name and surname, address of permanent/temporary residence, contact information, NIN, date of birth, sex, identification document if necessary);
- personal data required for risk assessment (education and working experience, working place and data connected with the working place, data on absence from working place, health data, financial data, data on social status and lifestyle, data on receipts and earnings, data on planned travel and travel expenses, data connected with the family);
- data on the subject-matter of insurance (identification number, characteristics, location, etc.);
- data on the harmful event (circumstances concerning its appearance as the result of an event caused by risk covered by insurance);
- data required for taking actions in conformity with our legal obligations (in-depth analysis of the party, accounting, tax reporting, etc.).

We collect personal data via defined functionalities of our information system in the way that is described in the processes of the company and via business documentation (forms, applications, etc.). Depending on the type of processing and the type of the insurance contract, the process of collection may be conducted as follows:

- your statement;
- review of your identification documents or your documentation, and the documents or documentation of the insurance file;
- making a copy of your identification documents or your documentation, and the documents or documentation of the insurance file when it is prescribed by law or our internal rules.

We primarily collect personal data directly from you, during negotiations on the contract, the conclusion of the contract, via forms, telephone, or electronic communication. We may obtain data about you directly from publicly available sources, from third parties, such as your business partners, insurance distributors, state authorities, other insurance companies and associations, appraisers, lawyers or financial institutions.

TO WHOM YOUR PERSONAL DATA WILL BE REVEALED

Your data will be processed exclusively for the purposes stated in this document. In order for such purposes to be achieved, your data will be revealed to the following categories of recipients on a need to know basis:

- bodies of state and public authorities,
- UNIQA Insurance Group AG
- Croatian Insurance Office
- intermediaries in insurance and re-insurance
- companies for insurance and re-insurance
- companies for the collection of claims and financial institutions
- medical institutions and doctors
- experts (lawyers, detectives, medical experts, appraisers, marketing and other experts)
- providers of information, print and delivery services
- providers of the services of verification of sanction lists and lists of politically exposed persons
- providers of the services of processing of claims for reimbursement and assistance (if agreed).

All recipients shall process your data in accordance with the instructions set out in the concluded Agreement on the Processing of Personal Data and in full compliance with the relevant technical and organisational measures to ensure the protection of your rights. Exceptions would be state and public authorities processing the data in accordance with the legislation and cases in which recipients apply special processing rules in accordance with the legislation relating to them and such processing.

WHERE YOUR PERSONAL DATA WILL BE PROCESSED

We shall process your data within the European Economic Area. If it is necessary to transfer your personal data outside this area, such transfer shall proceed only if the European Commission confirms that the third country fulfils a certain level of data protection or if there are adequate protection measures in accordance with the applicable law (eg, compulsory corporate rules, standard contractual clauses).

HOW LONG WE KEEP YOUR PERSONAL DATA

UNIQA osiguranje d.d. keeps your data in a form that enables your identification within the deadlines set out on the basis of the purpose of processing, legislation defining the periods for keeping such data, limitation periods defined in the applicable regulation, and internal by-laws setting out the keeping of deadlines with the aim of protecting the rights and interests of persons with vested interest from the insurance contract or the rights and interests of insurance companies, taking into consideration the

application of the relevant technical and organisational measures for the protection of your rights and freedoms.

RIGHTS YOU HAVE IN RELATION TO YOUR PERSONAL DATA

In the prescribed cases in relation to your data, you may realise the following rights:

- the right to information whether your data are processed and, if so, access to the data and information being processed
- the right to have your data deleted (where applicable)
- the right to a corrigendum and completion of data
- the right to the prescribed processing if, eg, you deny the accuracy of data or the legal grounds for processing until the data are corrected or the legal grounds for processing established
- the right to an objection in the case of processing conducted further to our legitimate interests and the legitimate interests of third parties or on the basis of public interest
- the right to the transferability of data (where applicable)
- the right that a decision based exclusively on automated processing does not relate to you, including the creation of the profile, if it has legal effects which relate to you or which affect you significantly in a similar way (where applicable).

Your rights may be realised by sending a written request to the following e-mail: info@uniqa.hr or to the address of the company at Planinska 13 A, Zagreb, or by submitting a request at any branch office of UNIQA osiguranje d.d.

RIGHT TO SUBMIT AN OBJECTION TO THE SUPERVISORY AUTHORITY

You may submit an objection to the processing of your personal data at any time if you hold that during such processing we violated Croatian or European regulations on the protection of data to the competent supervisory bodies, Croatian Data Protection Agency, ie, in the case of a change of valid regulations to some other authority that will assume its competence and, as of 25 May 2018, to the supervisory body within the EU.

AUTOMATED PROCESSING OF DATA AND PROFILING

Your personal data shall be the subject matter of profiling in the following cases:

- direct marketing
- marketing
- segmentation of clients.

Automated processing and profiling that has legal effects with the aim of concluding an insurance contract shall be used in the following cases:

- **establishing the appropriateness or suitability of insurance investment products**
In conformity with your investment goals, willingness to assume risks and the ability to bear risks, financial situation, and knowledge and experience in the field to which the investment relates, we shall examine which of our investment insurance products is appropriate or suitable just for you, with the aim of determining whether you belong to the target market. In this case, we ensure the right to personal intervention, the right to present one's opinion, and the right to dispute the decision.

- **calculation of the insurance premium in view of previous damages**
If you had damages in the previous insurance period and the conditions of insurance and the applicable price list set out how it affects the premium amount, the premium shall be increased or reduced by the relevant percentage amount.

- **calculation of the insurance premium in view of the location of the subject of insurance**

On the basis of the entry of the location of the insured property in the application, we estimate the extent of certain risks for the onset of the insurance event and thus determine the insurance premium.

- **online purchases**

Data entered on the portal of an Internet store and your choices will be automatically processed and will affect the final insurance contract you are concluding. The foregoing may relate to the matter of insurance (eg, the surface area of the real estate in the case of property insurance) or your selection of the insurer's package (eg, the selection of a package that includes several coverages).

In cases like this, we ensure the right to personal intervention, the right to express one's opinion and the right to dispute the decision.

UPDATING THE INFORMATION

Information on the processing of data is regularly examined and verified in terms of whether it reflects the way in which the company processes personal data. The current version is always available at our website www.uniqa.hr, and in the case of any more relevant changes that affect your rights and freedoms, we shall notify you directly.

Zagreb, 25 May 2018