

INFORMATION ON PROCESSING OF PERSONAL DATA

This information about the processing of personal data is targeted at the clients and potential clients of KOMUNÁLNA poisťovňa, a.s. Vienna Insurance Group and who, for the purposes of this document, consist of policyholders, insured persons and persons against whom KOMUNÁLNA poisťovňa, a.s. Vienna Insurance Group acquired the right for compensation within the meaning of Section 813 of the Civil Code (hereinafter referred to as the "injuring party"). Our company takes proper processing of clients' personal data very seriously. As of 25 May 2018, we have been processing the personal data of our clients in accordance with the Regulation (EU) No. 2016/679 dated 27th April 2016 of the European Parliament and of the Council on the protection of (General Data Protection ("Regulation") and in accordance with the respective Slovak law, namely the Act No. 18/2018 Coll. on bankruptcy and restructuring and on amendments to certain laws.

Please read the information below on the processing of personal data. The purpose of this document is to provide you with a clear overview of why we process your personal data, how we process it, what are your rights with respect to the processing and provide you with other relevant information on the processing of your personal data.

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A. Terms and definitions related to the processing of personal data

Please familiarize yourself with the basic terms and definitions in this document to help you better understand this document:

personal data - any information relating to an identified or identifiable natural person, such as first name, family name, date of birth, birth identification number, telephone number, e-mail address, etc.,

data subject - natural person to whom the personal data relate,

processing of personal data - an operation or a group of operations using personal data for collection, recording, organizing, storage, modification, using, disclosing to third parties or deletion,

Data Controller - a natural or legal person who determines the purpose and means of the processing of personal data;

The Data Controller may appoint an intermediary to process the data

intermediary - a natural or legal person, public authority, agency or other entity processing personal data on behalf of the Data Controller,

purpose - reason why the Data Controller processes

special categories of personal data - sensitive personal data having a specific character, such as health or biometric data enabling identification of a particular person,

legitimate interest - the interest of the Data Controller or other entity that implies the need for the processing of personal data, if such interest prevails over the interests of

profiling - any automated processing of personal data consisting of the use of such personal data to evaluate certain personal aspects of the data subject,

recipient - a natural or legal person, public authority, agency or another body, to which the personal data are disclosed,

product - insurance products and other products on our offer,

service - any services which we offer, e.g. assistance service,

Vienna Insurance Group - an insurance group operating in Austria, Central and Eastern Europe, consisting of approximately 50 companies in 25 countries. It has the highest rating within the Vienna Stock Exchange's main ATX index; shares are also listed in the Prague Stock Exchange. The main shareholder, directly or indirectly, is the Vienna Insurance Group AG Wiener Versicherung Gruppe,

Insurance Act - Act No. 39/2015 Coll. on Insurance and on Amendments to Certain Acts, as amended.

Who is the Data Controller of your personal data

The Data Controller of your personal data is KOMUNÁLNA poisťovňa, a.s. Vienna Insurance Group, with its registered office at: Štefánikova 17, 811 05 Bratislava, Company ID (ICO): 31 595 545, registered in the Commercial Register of the District Court Bratislava I, section: Sa, insert No 3345/B, (hereinafter referred to as the "**Company**"). Therefore, the Company determines the purpose and means of the processing of your personal data.

Contact information for the Company: KOMUNÁLNA poisťovňa, a.s. Vienna Insurance Group, Štefánikova 17, 811 05 Bratislava.

The Company has appointed a responsible person to oversee the protection of personal data in the Company. You can contact the responsible person electronically via e-mail dpo@kpas.sk or in writing at: KOMUNÁLNA poisťovňa, a.s. Vienna Insurance Group,

H. What personal data we process

In particular, the Company processes personal data that is necessary to provide you with products and services, to fulfil its legal obligations and to protect its legitimate interests. The Company mainly processes the following categories of personal data of the clients and potential clients:

- **Basic identification data**

Basic identification data are part of each agreement between you and us, or of any agreement on your behalf. These include, for example, first name and family name, birth identification number, address of residence, other personal data shown on an identification document, including photograph, nationality, and signature.

- **Contact information**

Contact information include, for example, email address, phone number, and postal address.

- **Socio-demographic data**

These include, for example, age, gender, marital status, education, occupation, income and expenses (including loans and credits).

- **Information about products and services**

This information includes information about the Company's products and services that are now or were in your possession (use).

- **Recordings of telephone calls**

These are voice recordings from telephone calls with you, where such recordings were made after you granted us your consent to such recording.

- **Health data**

Health data includes, for example, data on providing healthcare services and data on your physical and mental health.

- **Transaction data**

Transaction data are, for example, information on payments of premium, invested funds, including one-off and regular payments.

D. Sources from which we collect your personal

The Company collects your personal data mostly from you, in particular when concluding an agreement and over the period of duration of an insurance policy. We also collect your personal data from other persons if it is necessary to fulfil our obligations under the insurance policy (e.g. from the injured party, from healthcare providers and public authorities) or if such collection is part of a legal obligation. We verify your personal data through publicly available sources (e.g. business register, trade register, real estate cadastre, etc.).

Below is an overview of the most important other sources and data which we collect from them or which we verify in publicly available sources:

| Source of personal data | Categories of personal data |
|---|--|
| Policyholder | Insured person's data: normal personal data (basic identification data, contact and socio-demographic data) and health data Data on the injuring party, to the necessary extent |
| Insured person | Policyholder's data: normal personal data (basic identification data, contact and socio-demographic data) and health data Data on the injuring party, to the necessary extent |
| Police | Insured person's data: normal personal data (basic identification data) and health data Data on the injuring party, to the necessary extent |
| Health care providers, medical facilities | Insured person's data: normal personal data (basic identification data) and health data |
| Injured party | Insured person's data: normal personal data (basic identification data) and health data |
| Trade register, real estate cadastre, business register | Insured person's data: normal personal data (first name, family name, address, Company ID (IČO)) |
| Register of insurance events | Policyholder data and insured person's data: normal personal data (first name, family name, date when the harm |
| Court executors | Details of the parties to the enforcement procedure |

E. What is the purpose of processing your personal data

With your consent, the Company processes personal data for the following

- If you have given us specific consent to the processing of personal data and, at the same time, you have provided us with contact details for persons who may be interested in using the products and services of our Company, we process your personal data with the aim to provide such data to the persons identified by you and using the identified contact phone numbers.
- If you have given us permission to process personal data for **marketing purposes**, we process your data for the purpose of¹:
 - ✓ **provision of individualized marketing offers** (in particular information about the Company's products and services, promotions and discounts, events and competitions) using e-mail, sms, snail mail deliveries or by telephone,
 - ✓ **conducting market surveys and surveys of satisfaction with the Company's products and services by e-mail, snail mail or by telephone.**

Providing your data and consent is entirely voluntary, however, it is essential for the Company to be able to provide you with customized marketing offers, conduct market and satisfaction surveys.

- to determine the accuracy of information in the insurance policy and to evaluate the insured event, based on your consent we process your personal data concerning the health state of the insured person, by identifying and verifying such data (and subsequent processing of such data) in all health care facilities and with all doctors, as well as by obtaining extracts from medical records and by borrowing medical records;
- disclosure of your personal data, in connection with the insurance policy, to your parent to the following extent: dates of all accidents for which the claim was paid out under the insurance policy; the amount of claims payments under the insurance policy; dates of claims payments under the insurance policy; information (account number/address) to whom the claims payments under the insurance policy were made; health data related to the event for which the claim was paid;
- The Company processes **telephone call recordings in order to improve the quality of services provided**. If you do not wish to be recorded, you can use other communication channels.

The Company processes personal data **without your consent** for the following purposes:

¹ For existing and former clients, we process your personal data for this purpose also in the Company's legitimate interest (see below)

- The Company processes your personal data for the purpose of negotiating an insurance contract, **concluding your agreement, its subsequent administration** (e.g. modifications in the agreement) **and for the purpose of its performance** (e.g. in the event of claims settlement). For this purpose, you provide us with your personal data, mostly by including them in your insurance policy and in the forms used to amend the insurance policy or to request payment of claims under this insurance policy. For this purpose, the provision of your personal data is completely voluntary, although provision of such data is necessary to conclude, administer and to perform an insurance policy by the Company. Without this data, the Company
- In the event of your participation in a competition announced by the Company, the Company processes your personal data to the extent stipulated in the terms of the
- The Company also processes your personal data when **such processing is necessary to meet a legal obligation or is required under special regulations** based on the requirements for the Company defined by such special regulations.

These include, in particular, the following

- ✓ Pursuant to the Insurance Act and Act No. 40/1964 Coll. Civil Code, as amended, The Company processes your personal data for the purpose of your identification as the client, concluding, administration and performance of your agreement, and for the performance of other tasks and obligations. Such obligations include, for example, the Company's obligation to establish and implement an effective risk management system, which the Company also provides through reinsurance schemes.
- ✓ Pursuant to Act No. 431/2002 Coll. on Accounting, as amended, the Company processes your personal data for the purpose of keeping the Company's accounts.
- ✓ Pursuant to Act No. 395/2002 Coll. on archives and registries and on amendments to certain acts, as amended, the Company processes your personal data for the purpose of archiving registry records or archival documents.
- ✓ The Company also processes your personal data for the purpose of fulfilling its legal obligations pursuant to Act No. 307/2014 Coll. on certain measures related to the reporting of criminal behaviour and on amendments to certain acts, as amended, and Act No. 297/2008 Coll. on protection against money laundering and on protection against financing of terrorism and on amendments to certain acts, as amended.

- ✓ The Company also processes your personal data for the purpose of fulfilling its obligations under Act No. 186/2009 Coll. on financial intermediation, counselling and on amendments and supplements to certain acts (e.g. pursuant to § 31 para. 3 of this Act).
- ✓ The Company also processes your personal data for the purpose of fulfilling its obligations under Act No. 233/1995 Coll. Enforcement Code
- The Company processes personal data based on the **legitimate interest of the Company** for the following purposes:
 - ✓ management of client contracts within the Vienna Insurance Group, where the Company's legitimate interest is to ensure internal administration within the Group,
 - ✓ assessment of the Company's risk exposure, where the legitimate interest of the Company is to ensure a functional and safe risk management system through reinsurance schemes;
 - ✓ informing existing clients on the news concerning their insurance policy, products and services of the Company in the clients' possession or use; or which are related to such products or services, where the Company has a legitimate interest in conducting direct marketing for their existing clients;
 - ✓ recovery of the Company legal claims, where the legitimate interest of the company is providing evidence, assertion and defense of legal claims of the Company
 - ✓ In relation to existing clients and former clients - conducting market surveys and surveys of satisfaction with the Company's products and services, by e-mail, snail mail or by telephone
 - ✓ In the case of life insurance policies where the insured event is the death of the insured person (who is also the policyholder), the legitimate interest of the Company is to approach the beneficiary (a person other than the heir of the insured person or a person who is one of several heirs of the insured person) to request approval with the payment of the outstanding insurance premium, which arose on the insurance policy in question and such payment being completed in the form of its offset against the insurance claim. The Company's legitimate interest is the interest in the payment of receivables due from
 - ✓ The Company processes your data based on a legitimate interest of the Company to verify that your name does not appear on the sanction lists issued by the United States

- ✓ The Company processes your data based on the Company's legitimate interest for the purpose of assigning a receivable from you to a third party

F. How to withdraw your consent to the processing of personal data for marketing purposes

You may withdraw your consent to the processing of personal data for marketing purposes at any time. The withdrawal of consent shall not affect the lawfulness of processing based on the consent granted before its withdrawal.

What information should be contained in the withdrawal of consent?

- The withdrawal must clearly indicate who withdraws the consent. Please identify yourself by giving your first name, family name, address, date of birth and telephone number.
- If you deliver your withdrawal to the Company address or if you submit the withdrawal at our branch office, the withdrawal must also include your handwritten signature.

How can you submit your withdrawal of consent?

Withdrawal of consent to the processing of personal data for marketing purposes can be made:

- in writing at any branch office of the Company;
- in writing by sending the withdrawal to the address of the Company stated at the beginning of this document, electronically via the Company's website at www.kpas.sk/stranka/ochrana-osobnych-udajov.

G. Who will receive your personal data

To the maximum extent possible we process your personal data internally within the Company. We only disclose your personal data to third parties when it is necessary for the purpose of processing.

Intermediaries

For some activities, the Company cooperates with external entities which process personal data on behalf of the Company (hereinafter referred to as "**Intermediaries**"). The intermediaries always process personal data on the basis of an agreement concluded between the Company and the Intermediary. Currently, the Company's

- financial agents in the insurance and in the reinsurance sector
- intermediaries of supplementary insurance
- collection companies
- liquidation agents
- archiving and document shredding companies

- Intermediaries of postal and delivery services
- Contract services
- Medical assessors
- Detective agencies
- Translation companies
- IT services companies
- External web service providers
- Assistance service intermediaries
- Consultancy companies
- Advertising agencies
- Direct marketing agencies
- External call centres

Other recipients

- Financial agents in the insurance and reinsurance sector
- Companies of the Vienna Insurance Group
- Slovak Insurers' Bureau
- Slovak Association of Insurers
- reinsurers
- Banks and leasing companies (in the case of releasing blocked payments)
- Other insurance companies (co-insurance, refunds)
- Notifiers pursuant to Act No. 307/2014 Coll. on certain measures related to the reporting of criminal activities and on amendments to certain acts, as amended
- Law firms
- Experts
- Executors
- Social Insurance Company
- Mediators (with your consent)
- Trustees (bankruptcy trustees, restructuring trustees)
- Electronic stock exchanges of wrecked vehicles
- Companies conducting external financial audit
- Parties to which the Company had assigned a claim against you
- Your parents (if a consent was given)

Public authorities

Your personal data may be provided to **public authorities** in the event that such an obligation is imposed by law or such provision is required to fulfil the obligations imposed by law. These include, in particular, the National Bank of Slovakia and other supervisory authorities, courts and law enforcement authorities.

H. Where is your personal data processed

Your personal data is processed primarily in Slovakia and within the European Union. The Company transfers your personal data to countries outside the European Union, including countries where no relevant European Commission decision on adequacy applies (under Article 45 of the Regulation). This is especially the case when you need to use assistance services abroad, or if an insured event occurs abroad, and therefore the transfer of your personal data is necessary to perform your insurance policy (e.g. for the purpose of liquidation of this

insured event). Appropriate guarantees under Article 46 (1) of the Regulation have been accepted for transfers which are not necessary for the performance of the insurance policy into a country where no relevant decision of the European Commission on adequacy (under Article 45 of the Regulation) applies; in the form of standard personal data protection contractual clauses adopted by the European Commission. The text of these standard contractual clauses can be viewed here: www.kpas.sk/stranka/ochrana-

I. How long do we keep your personal data

Your personal data are processed by the Company for the duration of your insurance policy in order **to provide you with products and services and to fulfil its obligations** under the Insurance Act. Upon termination of your insurance policy and settlement of all rights and obligations relating to your insurance relationship, your personal data shall be retained for a period of maximum 10 years. If you have provided us with your personal data for the purpose of concluding an insurance policy and the insurance policy was not concluded, we retain your personal data:

- i. for the purpose of possible conclusion of this insurance policy at a later date, for a period of 60 days from the provision of such data, and
- ii. for the purpose (providing evidence) of the fulfilment of obligations under the Insurance Act, for a period of 3 years.

The period of keeping of your personal data is also determined by special laws, in particular Act no. 40/1964 Coll. Civil Code, as amended, Act No. 431/2002 Coll. on Accounting, as amended, as well as the Act No 297/2008 Coll. on protection against money laundering and on protection against financing of terrorism and on amendments to certain acts, as amended and **registry plan of the Company**.

If you have granted the Company a consent to the processing of personal data for **marketing purposes**, we will process your data for that purpose for the duration of your contractual relationship with the Company, provided that you do not withdraw your consent to the processing of personal data at an earlier date. If you are not a client of the Company, we process your personal data for marketing purposes for a period of one year after you have given your consent, unless you withdraw your consent to the

Your personal data obtained as a result of your consent to the processing of your personal data pertaining to your health, such data obtained through identifying and verifying (and subsequent processing of such data) in all health care facilities providing healthcare and with all doctors, as well as by obtaining extracts from medical records and by borrowing medical records; shall be obtained until such time as you withdraw your consent. However, the withdrawal of your consent does not affect the processing of such data obtained during the period in effect of your consent and the Company shall process such data after the termination of your insurance policy and after the settlement of all rights and obligations relating to your insurance relationship; for a period of

We will process your personal data, based on your consent to the processing of your personal data, in order to disclose your personal data to your parent, in connection with the insurance policy, to the following extent: dates of all accidents for which the claim was paid out under the insurance policy; the amount of claims payments under the insurance policy; dates of claims payments under the insurance policy; information (account number/address) to whom the claims payments under the insurance policy were made; health data related to the event for which the claim was paid; until such time as your consent is withdrawn. However, the withdrawal of your consent does not affect the processing of such data obtained during the period in effect of your consent and the Company shall process such data after the termination of your insurance policy and after the settlement of all rights and obligations relating to your insurance relationship; for a period of maximum 10 years.

We process and maintain your **telephone recordings** for a period of 5 years from the

We maintain, for a period of 10 years, your personal data processed **for the purpose of introducing and implementing an effective risk management system** after the termination of a contractual relationship and the settlement of all contractual rights and

In the case of processing your personal data for the purposes of **providing supportive evidence, applying and defending legal claims of the Company** in disputes, we process your personal data until a valid decision is taken or enforcement of our claims is completed. Subsequently we maintain your personal data being processed for this purpose for a period of 10 days.

In the event of processing your personal data to verify that your name does not show on the sanction lists issued by the United States of America, the Company processes this data 6 months after the termination of the contractual relationship, and payment of

The Company may process your personal data after the aforementioned periods have expired, if further processing of your personal data is necessary to fulfil the legal obligation of the Company, or if it is necessary to prove, assert or defend the Company's legal claims.

The Company applies the principle of minimization which means that upon the expiry of the period through which the Company was entitled to process personal data, the personal data shall be anonymized or deleted from the Company's databases and

J. Profiling and automated decision making

As part of their services, the Company uses profiling, or automated processing, to evaluate certain personal aspects. Automated processing is such processing of personal data using only automatic information systems, such as IT applications, software, electronic calculators and the like.

The Company conducts your profiling to analyse insurance risk (to assess the Company's risk exposure) and to identify potential insurance frauds. The Company also conducts profiling to determine the client's risk rate for the purposes of determining the rate of premium.

The Company wants to provide you with marketing offers that could be of your interest. It is with this objective in mind and upon your consent that we conduct your profiling. Profiling allows us to evaluate your situation, anticipate your needs and prepare the most suitable offer for you.

K. Your rights in connection with the processing of personal

You have the following rights with respect to the processing of your personal

- **Access to personal data**

According to Art. 15 of the Regulation you have the right to: a) obtain confirmation of whether or not the Company is processing your personal data; b) in the event of processing your personal data by the Company, to receive information on personal data processing defined in Art. 15 par. 1 of the Regulation, and c) to receive, upon request, a copy of the personal data processed by the Company.

In the case of unfounded or disproportionate requests, in particular because they are repeated, the Company may charge a reasonable fee for providing a copy of the personal data being processed.

- **Correction of personal data**

According to Art. 16 of the Regulation you have the right to correct your incorrect or incomplete personal data processed by the Company. The Company shall carry out the correction/modification without undue delay, but always takes into account the given technical possibilities.

- **Deletion of personal data**

You have the right to have your personal data deleted without undue delay in the cases referred to in Art. 17 of the Regulations, especially if: a) personal data are no longer necessary for the purposes for which they were obtained or otherwise processed, b) you withdraw your consent to the processing of personal data, c) you object to the processing of personal data for the purposes of legitimate interest of the Company and there are no justified reasons for processing, or you object to processing for direct marketing purposes, or d) the personal data have been processed unlawfully.

- **Restrictions on the processing of personal data**

According to Art. 18 of the Regulation you have the right to have the Company restrict the processing of personal data as long as you object to the accuracy of the personal data, the legality or legitimacy of the processing, or if you object to their processing.

- **Portability of personal data**

If you have provided us with personal data in connection with the agreement or with your consent, and we process it automatically, you have the right to obtain this personal data from us in a structured, commonly used and machine-readable format. If technically possible, we may also transfer your personal information directly to the Data Controller designated by you.

- **Objection to the processing of personal data**

According to Art. 21 you have the right to object to the processing of your personal data, which is carried out for a legitimate interest of the Company. Unless the Company proves that there are necessary legitimate grounds for processing that prevail over your interests, rights and freedoms, or grounds for establishing, asserting or defending legal claims, based on the objections raised the Company will terminate the processing without undue delay.

- **Objection to the processing of personal data for direct marketing purposes**

When the Company processes your personal data for direct marketing purposes based on the Company's legitimate interest, you have the right to object at any time to such processing of your personal data for direct marketing purposes, including profiling to the extent related to such marketing. If you object to processing for direct marketing purposes, the Company shall cease the processing of your personal data for this purpose.

- **Contact the supervisory authority**

If you believe that we have processed personal data in an unauthorized manner, you may file a complaint with the supervisory authority, i.e. the Office for Personal Data Protection of the Slovak Republic.

- **Withdrawal of consent given to the processing of personal data**

Giving consent to the processing of personal data is voluntary, and, therefore, it is up to you whether or not to provide your consent to the extent proposed. You may withdraw your consent to the processing of personal data at any time. The withdrawal of consent shall not affect the lawfulness of processing based on the

The above rights shall be exercised to the extent and under the conditions set out in

L. How can you can learn more and exercise your rights

If you have questions about the processing of your personal data, or if you would like to obtain more information, you may contact us in writing at: KOMUNÁLNA poisťovňa, a.s. Vienna Insurance Group, Štefánikova 17, 811 05 Bratislava. The Company has also appointed a responsible person to oversee the protection of personal data in the Company. You can contact the responsible person via e-mail dpo@kpas.sk or in writing at the above address of the Company.

Details of how you can exercise your rights are published on the Company's website on at www.kpas.sk.

This document will be regularly updated. State of affairs as at 23 December 2019