Basic information on the protection of personal data for the data subject

Intended for potential clients, clients (insured persons, policyholders), persons entitled to receive insurance benefits, and persons affected by an insurance event

1. **Protecting your data is very important to us**
   The purpose of this information is to explain to you which of your personal data we process, why we process it and how, to whom the personal data is provided or made accessible, and what your rights are in connection with the processing of your personal data. The processing is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (hereinafter referred to as the "Regulation").

2. **Who is the Controller Responsible for the Processing of Personal Data?**
   The controller is Union poisťovňa, a. s., Karadžičova 10, 813 60 Bratislava, Slovak Republic, Company ID: 31322051, registered in the Commercial Register of the Bratislava III City Court, Section Sa, Insert No. 383/B (referred to in the text as "we" or "our company"). In the processing of personal data related to marketing, website management, satisfaction surveys, and the customer centre (call centre), our company is a joint controller together with Union zdravotná poisťovňa, a. s., Karadžičova 10, 814 53 Bratislava, Slovak Republic, Company ID: 36284831, registered in the Commercial Register of the Bratislava III City Court, Section Sa, Insert No. 3832/B.

3. **Our Data Protection Officer** is the Senior Director of the Legal and Support Activities Division, who can be contacted at Union poisťovňa, a. s., Karadžičova 10, 813 60 Bratislava or via email at dataprotection@union.sk.

4. **Who is a data subject for the purposes of this information?**
   This information concerns you if you are a data subject whose personal data is processed because you are our potential client, client (insured person, policyholder) or you are a representative of a client, a person entitled to receive an insurance benefit in the event of the insured person's death, an heir of the client, a person affected by an insurance event, or another natural person whose personal data must be processed in the execution of insurance activities.

5. **For what purpose do we process your personal data?**
   We process your personal data only to the extent necessary to fulfil the specific purpose of processing related to our company's activities, based on generally binding legal regulations, performance of the subject of the contract, your consent or legitimate interest. An overview of all purposes, categories of personal data, and legal bases for processing your personal data is provided in the table below:

Purpose of personal data processing *not requiring your consent*, and categories of personal data processed about you	**Legal basis for personal data processing and data retention period *where your consent is not required***
Purpose of processing: Conducting insurance and reinsurance activities. This includes, for example, fulfilling our obligations within pre-contractual relationships, concluding insurance contracts, managing insurance contracts, settling insurance claims, providing assistance services, documenting our activities, and fulfilling tasks under Act No.	***Legal basis:*** - performance of the contract (Article 6(1)(b) of the Regulation), - compliance with our legal obligation (Article 6(1)(c) of the Regulation). ***Retention period:*** for the duration of the insurance contract and also 10 years after the

39/2015 Coll. on Insurance and on the Amendment and Supplementing of Certain Acts, as amended (hereinafter also referred to as the "Insurance Act"). **Categories of personal data** in the performance of insurance and reinsurance activities[1] (see footnote below). Other personal data related to the use of electronic services (e.g. data related to electronic access and actions related to the client and/or partner area, such as IP address)	termination of the contractual relationship. If we assert a claim under the insurance contract or a claim is asserted against us, we may retain personal data longer, until the expiration of the limitation period. If your personal data is related to an insurance claim, we process it for 10 years after the insurance claim file is closed. Personal data of our potential clients is processed for one year (if the sales process on the website is not completed) and for two years (if the sales process on the website is completed and the potential client does not pay the premium).
Purpose of processing: Fulfilment of our statutory obligations under generally binding legal regulations: e.g. accounting, registry management, providing cooperation to public authorities, prevention and detection of money laundering, protection against the financing of terrorism, and implementation of international sanctions. ***Categories of personal data:*** a) common personal data (birth number, name and surname, date of birth, address, gender, email, phone number, insurance data including financial transactions), b) special category (health status), c) other personal data specified in special legal regulations.	***Legal basis:*** compliance with our legal obligation (Article 6(1)(c) of the Regulation). ***Retention period:*** for the necessary period pursuant to the relevant legal regulations; for accounting purposes, 10 years from recording the accounting document; for regular correspondence, 5 years from closing the file; for prevention and detection of money laundering, protection against financing of terrorism, and implementation of international sanctions, 5 years from termination of the contractual relationship with the client or from carrying out an occasional transaction outside of a business relationship, unless a longer period is specified by the Financial Intelligence Unit.
Purpose of processing: complaints handling. ***Categories of personal data:*** a) common personal data (birth number, name and surname, date of birth, address, gender, email, phone number, insurance data including financial transactions), b) special category (medical condition).	***Legal basis:*** - performance of the contract (Article 6(1)(b) of the Regulation), - compliance with our legal obligation (Article 6(1)(c) of the Regulation). ***Retention period:*** 5 years after the case file is closed.

[1] Concluding an insurance contract is voluntary, but you are required under the Insurance Act to provide personal data for this purpose, unless specified as optional—i.e. the provision of data for this purpose is a condition for concluding the insurance contract, and failure to provide such data may result in refusal to enter into the insurance contract on our part. The list of personal data processed without consent is to the extent specified in § 78 of the Insurance Act: name, surname, permanent residence, temporary residence, birth number, date of birth, nationality, type and number of identity document, contact telephone number, fax number, and email address, as well as personal data from the identity document. In cases where additional personal data are processed, such as data relating to health, these are processed to the extent necessary for risk assessment when concluding the insurance contract and for determining the extent of the obligation to provide insurance benefits.

Purpose of processing: prevention and detection of antisocial activities (fraud assessment). ***Categories of personal data:*** a) common personal data (birth number, name and surname, date of birth, address, gender, email, phone number, insurance data including financial transactions), b) special category (e.g. medical condition).	***Legal basis:*** - compliance with our legal obligation (Article 6(1)(c) of the Regulation), - our legitimate interest (Article 6(1)(f) of the Regulation); such processing is conducted in the interest of preventing and detecting criminal or other undesirable socially harmful activity, and you have the right to object to such processing. ***Retention period:*** 10 years after the conclusion of the investigation.
Purpose of processing: Asserting our claims and defending our rights. ***Categories of personal data:*** a) common personal data (birth number, name and surname, date of birth, address, gender, email, phone number, insurance data including financial transactions), b) special category (e.g. medical condition, camera recordings).	***Legal basis:*** our legitimate interest (Article 6(1)(f) of the Regulation), whereby processing is conducted in the interest of establishing, exercising, and defending our legal claims. You have the right to object to such processing at any time. You have the right to object to such processing at any time. ***Retention period:*** 10 years after the case file is closed or until the expiration of the limitation period.
Purpose of processing: Recording telephone calls to our customer centre (call centre). ***Categories of personal data:*** a) common personal data (birth number, name and surname, date of birth, address, gender, email, phone number, insurance data including financial transactions), b) special category (e.g. medical condition).	***Legal basis:*** Our legitimate interest (Article 6(1)(f) of the Regulation), in order to improve the services, we provide to you and to establish and defend our claims. Callers are notified of the recording at the beginning of the call. You have the right to object to such processing at any time. ***Retention period:*** 5 years from the creation of the recording.
Purpose of processing: Direct marketing – informing our existing clients about updates related to their insurance contracts and about our products and services which they have, or which are related to already provided products or services, including profiling. ***Categories of personal data:*** common personal data (name and surname, title, residential address, e-mail, telephone number, insurance data).	***Legal basis:*** Our legitimate interest (Article 6(1)(f) of the Regulation), whereby such processing is conducted in order to inform you, particularly about product updates and offers including targeted marketing. You have the right to object to such processing at any time. ***Retention period:*** for the duration of the insurance contract or until you object to such processing.
Purpose of processing: satisfaction survey. **Category of personal data:** common personal data (name and surname, title, residential address, e-mail, telephone number).	***Legal basis:*** Our legitimate interest (Article 6(1)(f) of the Regulation) to be able to evaluate the quality of the services provided in order to improve them and to identify the needs of our clients. You have the right to object to such processing at any time.

	Retention period: 3 months from the completion of the survey.
Purpose of personal data processing requiring your consent *(excluding necessary cookies)*	**Legal basis for personal data processing and retention period *where your consent is required***
Purpose of processing: Marketing offers – product promotion, sending newsletters and competitions including profiling, where legitimate interest is not used as the legal basis. ***Categories of personal data:*** Common personal data (name and surname, title, address, email, phone number or other data specified in the consent).	***Legal basis:*** Your consent (Article 6(1)(a) of the Regulation); you may withdraw your consent at any time, and such withdrawal shall have no retroactive effect. ***Retention period:*** for the period specified in your consent, or until you withdraw your consent. We then retain your personal data for a further five years after the consent expires.
Purpose of processing: Your personal data will then be retained for an additional five years after the consent expires. Evaluating website visitors' behaviour and personalising website content (based on consent). ***Categories of personal data:*** cookies and IP addresses.	More information about such processing can be found on our website here: https://www.union.sk/vyuzivanie-cookies

6. **How do we obtain personal data?**
   We primarily obtain your personal data from you or through intermediaries (especially financial agents) who are contractually affiliated with us, particularly during the process of concluding an insurance contract and throughout the duration of the insurance contract, for example when handling claims arising from an insurance event. We may also obtain your personal data from other persons where necessary for fulfilling our obligations, such as from the injured party, healthcare providers, the Slovak Bureau of Insurers (in connection with verifying claim history in compulsory motor third-party liability insurance), the police and public authorities, and from relevant registers. In accordance with the Insurance Act, we may also obtain personal data from other insurers for the purpose of client protection and prevention of insurance fraud.

7. **Recipients and categories of recipients of personal data**
   Your personal data may be disclosed or provided to recipients based on generally binding legal regulations, who act as independent controllers and/or joint controllers, or for the purposes specified in section 5 above we may authorise processors to process your personal data on our behalf and according to our instructions. The selected recipients and categories of recipients to whom your personal data may be disclosed are listed in Annex No. 1 Categories of Personal Data Recipients and Selected Recipients and Processors of this document.

8. **Your rights as a data subject**
   If we process your personal data, you have the following rights under the Regulation, unless generally binding legal regulations stipulate otherwise (your rights are set out in Articles 12 to 22 of the Regulation):
   8.1. the right to obtain confirmation as to whether or not your personal data are being processed, and, if so, the right to access such personal data pursuant to Article 15 of the Regulation, along with the information provided in this notice;
   8.2. the right to rectification and completion of your personal data under Article 16 of the Regulation;

8.3. the right to erasure (right to be forgotten) of your personal data if these are no longer necessary for the purposes for which they were collected or otherwise processed under Article 17 of the Regulation;
8.4. the right to restrict the processing of your personal data if one of the conditions under Article 18 of the Regulation is met;
8.5. the right to receive the personal data concerning you, which you have provided to us, and the right to transmit those data to another controller under Article 20 of the Regulation;
8.6. the right to object at any time to the processing of your personal data by us and/or to lodge a complaint. Under Article 21 of the Regulation, you have the right to object if we process your personal data on the basis of legitimate interest, including processing for direct marketing purposes and profiling;
8.7. the right to object to and not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, under Article 22 of the Regulation. You have the right to request a review of such a decision by a method other than automated processing, and we are obliged to comply with such a request by ensuring that our employees play a decisive role in the review. We will inform you of the method of review and the findings within 30 days of receipt of the request;
8.8. the right to request proof of the identity of the person authorised to collect personal data;
8.9. if your personal data was not obtained from you, you have the right to obtain information about the source from which your personal data originates, including whether it comes from publicly accessible sources.

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

a. in writing at our registered office address: Union poisťovňa, a. s., Karadžičova 10, 813 60 Bratislava, Slovak Republic, or in writing via email to dataprotection@union.sk,
b. in person orally for the record, which must clearly indicate who is exercising the right, what is being requested, when and by whom the record was prepared, including their signature and your signature; a copy of the record will be given to you,
c. through an intermediary, who will subsequently forward your request or the record to us for processing.

9. **You have the right to lodge a complaint with the supervisory authority, namely the Office for Personal Data Protection – Úrad na ochranu osobných údajov**
You have the right to lodge a complaint with the Office for Personal Data Protection if you believe that the processing of your personal data by us is in breach of data protection legislation.

10. **Does the processing of your personal data involve automated individual decision-making or profiling?**
The processing of your personal data by our company does not include automated individual decision-making. Our company uses **profiling – automated tools for processing personal data** – for the purpose of evaluating certain aspects of you in the following contexts/sub-purposes:
10.1. profiling related to the purpose of conducting insurance and reinsurance activities for analysing insurance risk during risk underwriting and assessing claims history in pre-contractual relationships;
10.2. profiling related to marketing outreach in the form of targeted marketing offers;
10.3. profiling related to the prevention of insurance fraud for the purposes of anti-money laundering, countering terrorist financing, and implementing international sanctions.
The consequences of profiling may include, for example: refusal to conclude an insurance contract (as part of risk underwriting or fraud prevention), consideration of claims history in determining the terms of your insurance including the premium amount, and sending or not sending a targeted marketing offer.
11. **Personal data shall not be disclosed to the public.**

12. **Transfer of personal data**
Our company predominantly transfers your personal data to recipients in countries of the European Union, countries that are parties to the Agreement on the European Economic Area, and Switzerland. Transfers of your personal data to third countries are only carried out if the European Commission has decided that these countries ensure an adequate level of protection, or, in the absence of such a decision, only if the controller or processor has provided appropriate safeguards and you have enforceable rights and effective legal remedies available, or if additional security measures relating to the transfer of your personal data have been adopted.
As part of certain marketing communications and during data backup, our company also uses major service providers Google, Facebook, and Microsoft, specifically Google LLC, Meta Platforms, Inc., and Microsoft Corporation. These providers are based in the USA, and the transfer of personal data to these entities is conducted based on the European Commission's adequacy decision adopted on 10 July 2023, concerning the EU-US Data Privacy Framework, pursuant to Article 45 of the Regulation. Providers from the USA providers participating in this framework, to whom personal data from the EU may be safely transferred without the need to implement additional data protection safeguards, can be found at: https://www.dataprivacyframework.gov/s/participant-search, where their personal data protection terms are also provided.

13. **Updating basic information on data protection for the data subject**
Our company has the right to update these basic data protection details for the data subject (including Annex No. 1) on an ongoing basis. The current version of this information is always available on the website www.union.sk under the section Personal Data Protection.

Annex No. 1 – Categories of Personal Data Recipients and Selected Recipients and Processors

Your personal data may be provided, in particular, to:
- our sister company Union zdravotná poisťovňa, a. s., Company ID: 36284831, and our parent company Achmea B. V., Netherlands, Company ID: 33235189,
- financial agents in the insurance or reinsurance sector,
- reinsurance companies,
- medical examiners,
- assistance service companies,
- companies we cooperate with for the settlement of insurance claims in the event of an insurance incident,
- companies acting on behalf of and for the benefit of our company in relation to asserting rights arising from the insurance contract against the policyholder,
- companies providing correspondence services between our company and data subjects,
- companies providing IT services,
- a company handling document digitisation for our company,
- a company operating archival and registry management services,
- a company evaluating satisfaction surveys regarding our services,
- our external auditor,
- public authorities in accordance with applicable legal regulations.

If you have concluded a travel insurance contract and a contract covering the costs of Mountain Rescue Service interventions, or a property and liability insurance contract for individuals, the personal data included in the insurance contract may also be provided to:
- the assistance service provider Eurocross Assistance Czech Republic, s.r.o., Company ID: 25598180.

If you have concluded an insurance contract for a motor vehicle or trailer, or a liability insurance contract for damage caused by the operation of a motor vehicle, the personal data specified in the insurance contract may also be provided to:

- the company Slovenská kancelária poisťovateľov, corporate ID: 36062235, in accordance with § 11(3) of Act No. 381/2001 Coll.,
- the assistance service provider Eurocross Assistance Czech Republic, s.r.o., corporate ID: 25598180,
- a car service centres 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, 4550 Linden Hill Road, Ste 103, Wilmington DE 19808, United States of America, which ensures verification of the diagnosed condition and assessment of the proposed treatment,
- the local partner of MediGuide International, who ensures communication between the insured, MediGuide International, and the foreign clinic chosen by the insured from the offered selection, which conducts the verification of the diagnosed condition and proposed treatment,
- the specialised clinic chosen by the insured from the offered selection, which conducts the verification of the diagnosed condition and proposed treatment.

Version effective from 05.06.2025.