

Basic information on personal data protection for data subjects

Intended for potential clients, clients (insured persons, policyholders), persons entitled to receive insurance benefits, injured parties in insurance claims

1. The following information is an explanation for you (the “**data subject**”) of why we process your personal data, how we process it and what rights you have in relation to the processing of your personal data. **This information is relevant to you if you are our potential client, client (insured person, policyholder), a person entitled to receive insurance benefits on the death of an insured person or an injured party in an insurance claim.**
2. The **data controller** is Union poisťovňa, a.s., Karadžičova 10, 813 60 Bratislava, Slovak Republic, ID no.: 31322051, registered in the Companies Register of Bratislava I District Court, section Sa, entry 383/B (“we” or “our company”). In processing personal data for the purposes of marketing, web page administration, satisfaction research and call centre operations, our company is a **joint controller** with Union zdravotná poisťovňa, a.s., Karadžičova 10, 814 53 Bratislava, Slovak Republic, ID no.: 36284831, registered in the Companies Register of Bratislava I District Court, Section Sa entry 3832/B.
3. Our **responsible person** is the director of the legal and compliance division. Correspondence can be sent by post to the address of our registered office or by e-mail to dataprotection@union.sk.
4. Our company processes your personal data mainly for purposes related to insurance and reinsurance services though we also process your personal data for other purposes, which are set out in the following summary:

Purpose for which your personal data is processed	Legal basis for the processing of your personal data
Performance of insurance and reinsurance activities. In providing you with insurance services, we are subject to various obligations in pre-contractual relations, concluding insurance contracts, managing insurance contracts, settling claims, providing assistance services and documenting our activities.	The legal basis for the processing of your personal data is constituted by Article 6(1)(b), (c) and (f) of the GDPR, Act No 39/2015 on insurance and amending certain acts, as amended, and other applicable legislation. This means that we do not require your consent for personal data processing in these matters. Where the non-obligatory nature of personal data provision is not indicated, the data provided in such cases is necessary for the conclusion of an insurance contract or the provision of contractual benefits (e.g., insurance benefit, assistance services) and it is not possible to conclude an insurance contract or provide benefits if the data is not provided. ¹
Compliance with our legal obligations – e.g. keeping accounts, keeping other records, providing cooperation to public authorities.	The legal basis for the processing of your personal data is Article 6(1)(c) of the GDPR.

¹ The list of personal data processed without consent is laid down in Section 78 of the Act on Insurance: forename, surname, address of permanent or temporary residence, birth ID number, date of birth, nationality (citizenship), the type and number of your identity document, your contact phone number, fax number and e-mail address and personal data from your identity document. Other personal data, such as health data, is processed in the scope necessary to assess the risk when concluding an insurance contract and determine the scope of our obligation to pay insurance benefit.



Poistovňa

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	<p>This means that we do not require your consent for personal data processing in these matters.</p>
Complaint handling	<p>The legal basis for the processing of your personal data is Article 6(1)(b) and (c) of the GDPR.</p> <p>This means that we do not require your consent for personal data processing in these matters.</p>
Prevention and detection of money laundering and terrorist financing	<p>The legal basis for the processing of your personal data is constituted by Article 6(1)(c) of the GDPR and Act No 297/2008 on protection against money laundering and protection against terrorist financing, and amending certain acts, as amended.</p> <p>This means that we do not require your consent for such personal data processing because we are obliged to process it in the scope stipulated by the cited act for the purposes of preventing and detecting money laundering and terrorist financing.</p>
Prevention and detection of anti-social activity (fraud assessment)	<p>The legal basis for the processing of your personal data is Article 6(1)(c) and (f) of the GDPR. Such processing is carried out for the prevention and detection of crime or other undesirable anti-social activities.</p> <p>This means that we do not require your consent for personal data processing in these matters.</p>
Enforcing our claims and defending our rights	<p>The legal basis for the processing of your personal data is Article 6(1)(f) of the GDPR because we conduct such processing to prove, assert and defend our legal claims.</p> <p>This means that we do not require your consent for personal data processing in these matters.</p>
Recording of telephone calls to our customer centre (call centre)	<p>The legal basis for the processing of your personal data is Article 6(1)(f) of the GDPR because it enables us to improve the services that we provide to you and to prove and defend our claims.</p> <p>This means that we do not require your consent for personal data processing in these matters.</p>
Marketing offers – the offer of products, the sending of newsletters and competitions, whereas such processing includes profiling	<p>The legal basis for the processing of your personal data is your consent (Article 6(1)(a) of the GDPR). Consent may be withdrawn at any time but does not have retroactive effect.</p>
Direct marketing – providing existing customers up-to-date information on their insurance contracts and other products or services that they have or that are related to such products or services, whereas such processing includes profiling.	<p>The legal basis for the processing of your personal data is Article 6(1)(f) of the GDPR (legitimate interest) because we use such processing to improve and personalise the services that we provide to you. You have the right to object to such processing at any time.</p>



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Satisfaction surveys	The legal basis for the processing of your personal data is our legitimate interest (Article 6(1)(f) of the GDPR) because it enables us to evaluate the quality of the services provided with a view to improving them and identifying the needs of our clients. You have the right to object to such processing at any time.
Ensuring the security and functionality of our web services Tracking the behaviour of visitors to our web sites and personalising their content. (mostly cookies, IP addresses).	Further information on such processing can be found on our website at the address: https://www.union.sk/vyuzivanie-cookies

5. We obtain personal data primarily from you, mainly during the process for concluding the insurance contract and during the term of the insurance contract, e.g., when settling insurance claims. We may also obtain your personal data from other persons if it is necessary for the fulfilment of our obligations, e.g., from health care providers, the police and public authorities. We can also obtain personal data from other insurance companies in the scope permitted by the act on insurance for the purpose of preventing insurance fraud.

6. Personal data recipients

The main recipients to whom we may provide your personal data are:

- our sister company Union zdravotná poisťovňa, a.s., ID no.: 36284831 and our parent company Achmea BV, Netherlands, ID no.: 33235189,
- financial agents in the insurance or reinsurance sector,
- reinsurance companies,
- medical assessor,
- companies that act on behalf of our company in the exercise of rights in relation to policyholders under insurance contracts,
- companies that provide services related to correspondence between our company and data subjects: Direct Marketing a.s., ID no.: 31377793, Tatra Billing, s.r.o., ID no.: 35810572, Zelená pošta s.r.o., ID no.: 49529233,
- companies providing IT services,
- companies that provide document digitisation services for our company: NUPSESO, a.s., ID no.: 36525791,
- companies providing archiving and record-keeping services: IRON MOUNTAIN SLOVAKIA, s.r.o., ID no.: 36232734,
- companies that evaluate surveys on satisfaction with our services: Metrixlab Nederland B.V. Rotterdam, Netherlands, ID no.: 59608838, Trustpilot A/S, Pilestraede 58, Denmark,
- our external auditor,
- public authorities in accordance with applicable legislation.

If you have taken out travel insurance or mountain rescue insurance, property insurance or insurance for liability to natural persons, the personal data entered in your insurance contract may also be provided to:

- the company providing assistance services EuroCross Assistance Czech Republic, s.r.o., ID no.: 25598180.

If you have taken out insurance for a motor vehicle or a trailer, or motor third-party liability insurance, the personal data entered in your insurance contract may also be provided:



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- on occurrence of an insured event, to companies that we cooperate with in settling claims for such events: TECHCAR Slovakia s.r.o., ID no.: 36862592, AVUS Internationale Schadensregulierungen, Linz, Rakúsko, ID no.: FN 22290 f.,
- the company Slovenská kancelária poisťovateľov, ID no.: 36062235 in accordance with the Section 11(3) of Act No. 381/2001,
- the company providing assistance services EuroCross Assistance Czech Republic, s.r.o., ID no.: 25598180,
- repair garages carrying out repair of damaged vehicles.

If you have taken out cancer insurance or “Moje zdravie” health insurance, your personal data as recorded in the insurance contract may also be provided to:

- the company MediGuide International, LLC, 4550 Linden Hill Road, Ste 103, Wilmington DE 19808, USA, which provides services for the verification of diagnoses and the assessment of proposed treatment,
- the local partner of MediGuide International, which handles communication between the insured person, MediGuide International and the foreign clinic that the insured person chooses from the offer list to review the established diagnosis and the proposed treatment,
- the specialised clinic chosen by the insured person from the offer list, which reviews the established diagnosis and the proposed treatment.

If you have an insurance contract with Poštová poisťovňa, a.s., Dvořákovo nábrežie 4, 811 02 Bratislava, 811 02 Bratislava, Slovak Republic, ID no 31405410, registered in the Companies Register of Bratislava I District Court, Section Sa, entry 953/B and/or your personal data are processed under an insurance contract with this insurance company, the personal data in the insurance contract may be provided to other entities in addition to the recipients and/or activities referred to above, namely:

- AIS Software, a.s., Czech Republic, ID no.: 607 445 11, which provides IT services
- TECHCAR, a. s., ID no.: 36862592 which provides cooperation in handling insurance claims, identification and verification of the identity of clients,
- Cromwell, a. s., ID no.: 31353746, which provides printing services, the preparation and sending of correspondence between our company and data subjects.

The companies mentioned above may change during the insurance relationship, and the insurer maintains an up-to-date list of such companies on the company website in a document with the same name as this document in the section on Personal Data Protection.

7. Period for which your personal data is retained

We keep personal data on our clients for the duration of the insurance contract plus 10 years from the end of the contractual relationship. If we exercise a right under the insurance contract or if a right is exercised against us, personal data may be kept longer, until the end of the limitation period. If your personal data relates to the settlement of a claim or the handling of a complaint, it will be processed for 10 years from the closure of the file.

The personal data of potential clients is processed for six months, in some cases for two years, unless you give us consent to process the data for longer.

If you consent to the use of your personal data for marketing purposes, the personal data will be used for the period specified in your consent or until you withdraw your consent. We will then keep your personal data for five years from the last time it is used for such purposes.

We use your personal data for direct marketing during the term of the insurance contract or until your object to such data processing.

If you take part in a satisfaction survey, we will process the data obtained in the survey for three months.

8. Your rights as a data subject

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

- 8.1. The right to obtain confirmation of whether your personal data is being processed and if so, you have the right to obtain access to this personal data together with the information provided in this document.
- 8.2. The right to have your personal data corrected or updated if the personal data is incorrect or incomplete.
- 8.3. The right to deletion (forgetting) of your personal data if it is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
- 8.4. The right to have the processing of your personal data restricted if:
 - you contest the accuracy of your personal data, for the period necessary to verify the data's accuracy,
 - the processing is unlawful and you oppose the erasure of the personal data and wish its use to be restricted instead,
 - we no longer need your personal data for the purposes of the processing but you need them for the establishment, exercise or defence of legal claims.
- 8.5. The right to receive personal data concerning you that you have provided to us and the right to transmit such data to another controller.
- 8.6. The right to object to our processing of your personal data at any time. You also have the right to object if we process your personal data for a legitimate public interest and if we process it for the purposes of direct marketing, whereas such processing includes profiling.
- 8.7. The right to file a complaint with the Office for Personal Data Protection if you believe that our processing of your personal data is in breach of the law on personal data protection.
- 8.8. The right to object and not be subject to a decision that we take based solely on automated processing of personal data if it produces legal effects concerning you or similarly significantly affects you. You have the right to request us to review the issued decision by a method other than automated processing and we are obliged to comply with such a request in such a way that our employees play a decision-making role in the review. We will inform you of the method of review and the results of our findings within 30 days of receiving your request.
- 8.9. The right to require proof of the identity of a person authorised to obtain personal data.
- 8.10. If your personal data is not obtained from you, you have the right to be informed from which source the personal data originates, and if applicable, whether it came from publicly accessible sources.

If you do not have full legal capacity, your rights can be exercised by your legal representative. If the data subject is not alive, their rights under applicable legislation on personal data protection can be exercised by a close person.

You can exercise your rights by one of the following means:

- a) in writing, addressed to our registered office,
- b) in electronic form, by sending e-mail to dataprotection@union.sk,
- c) in person, in spoken form entered in minutes from which it must be clear who exercised the right, what you are claiming and who took the minutes, their signature and your signature; we will give you a copy of the minutes,
- d) via an intermediary, who will then forward your request or the minutes to us for handling.

9. Our company uses **automated tools for the processing of personal data** to evaluate certain personal aspects relating to data subjects (profiling). Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic



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situation, health, personal preferences, interests, reliability, behaviour, location or movements. Data subjects' personal data is processed in this way mainly for the analysis of insurance risk, to identify potential insurance fraud, or for protection against money laundering and terrorist financing. You have the rights set out in point 8.8 hereof in relation to decisions based solely on automated processing of personal data including profiling.

10. Personal data will not be made public.

11. Transfer of personal data

Our company foresees the transfer your personal data to the recipients in European Union Member States, countries that are State Parties to the Agreement on the European Economic Area and Switzerland (the persons listed in point 6 hereof). Your personal data is transferred to third countries only if the European Commission has found that these countries ensure an adequate level of protection or, if no such finding exists, only if the controller or processor has provided appropriate safeguards, and on condition that enforceable data subject rights and effective legal remedies are available to you.

12. Updates to the basic information on personal data protection for data subjects

Our company is entitled to update this basic information on personal data protection for data subjects and the latest version of the information is always available from the website www.union.sk in the section on Personal Data Protection.