



Union zdravotná poisťovňa, a. s.  
Karadžičova 10  
814 53 Bratislava  
IČO: 36284831  
DIČ: 2022152517

Spoločnosť zapísaná v obchodnom registri  
Mestského súdu Bratislava III, odd. Sa, vl. č. 3832/B

## Zdravotná poisťovňa

### Basic information on personal data protection for a data subject *For policyholders and premium payers*

#### 1. Protecting your data is very important to us

The purpose of this information is to explain to you what personal data we process about you, why we process your personal data and how we process it, to whom your personal data is disclosed or made available and what your rights are in relation to 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 and repealing Directive 95/46/EC (the "Regulation").

#### 2. Who is the data controller responsible for the processing of personal data?

The data controller is Union zdravotná poisťovňa, a.s., Karadžičova 10, 814 53 Bratislava, Slovak Republic, Corporate ID: 36 284 831, registered in the Commercial Register of the Municipal Court Bratislava III, section Sa, entry no. 3832/B (hereinafter also referred to as "we" or "our company"). For the processing of personal data in the areas of marketing, website administration, satisfaction surveys and customer service (call centre), our company is a **joint data controller** together with Union poisťovňa, a. s., Karadžičova 10, 813 60 Bratislava, Slovak Republic, Corporate ID: 31322051, registered in the Commercial Register of the Municipal Court Bratislava III, section Sa, file no.: 383/B.

#### 3. Our responsible person is the Senior Director of Legal and Support Activities, who can be contacted at the address Union zdravotná poisťovňa, a. s., Karadžičova 10, 814 53 Bratislava or by e-mail: [dataprotection@union.sk](mailto:dataprotection@union.sk).

#### 4. Who is the data subject for the purposes of this information?

This information applies to you if you are our policyholder, a premium payer, the legal representative and attorney of the policyholder or an attorney of a premium payer. This information applies to you also if you are a user of our mobile app.

#### 5. For what purpose is your personal data processed?

We only process your personal data to the extent necessary to fulfil the relevant processing purpose relating to our company's activities, on the basis of generally binding legal regulations, the performance of the subject matter of the contract, your consent or legitimate interest. An overview of all the purposes, categories of personal data and legal bases for processing your personal data is set out in the table below:

Purpose of the processing of personal data <i>where your consent is not required</i> and the categories of personal data we process about you	Legal basis for processing personal data and retention period <i>where your consent is not required</i>
<b>Purpose of processing:</b> Provision of public health insurance. The provision of public health insurance includes, for example, carrying out activities to ensure the safe and efficient provision of healthcare and health consultancy for you.	<b>Legal basis:</b> Compliance with our legal obligation (Article 6(1)(c) of the Regulation), in particular on the basis of Act No 580/2004 on health insurance, as amended, Act No 581/2004 on health insurance companies and health care supervision, as amended, Act No 576/2004 on healthcare, services connected with the provision of healthcare and amending certain acts, as amended, Act No 577/2004 on the scope of healthcare reimbursed from public health insurance and payments for services connected with the provision of healthcare, as amended, and other applicable legislation.  <b>Retention period:</b> We will retain your personal data for the duration of the public health insurance and



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<b>Categories of personal data</b> in the provision of public health insurance <sup>1</sup> (see footnote below).	also for 15 years from the date of termination of the public health insurance or the provision of health care in the Slovak Republic, or the death of the natural person, or from the date the natural person is declared dead, whichever is earlier. The retention period may be extended if we exercise a right or a right is exercised against us in connection with the exercise of public health insurance, until the expiry of the limitation period. We process personal data on our potential clients for a period of two years; in certain cases for a period of two years unless you consent to longer processing.
<b>Purpose of processing:</b> Performance of our legal obligations under generally applicable law: e.g. bookkeeping, registry management, provision of assistance to public authorities, prevention and detection of money laundering, protection against terrorist financing and implementation of international sanctions.  <b>Category of personal data:</b> a) ordinary personal data, in particular basic identification data and contact data (forename and surname, title, address, e-mail, telephone number and data regarding the status of the representative of a contractual partner, such as job title data), b) other personal data specified in specific legal regulations.	<b>Legal basis:</b> - compliance with our legal obligation (Article 6(1)(c) of the Regulation); These include Act No. 431/2002 Coll. on accounting, as amended, Act No. 395/2002 Coll. on archives and registers and on the amendment of certain acts, as amended, Act No. 297/2008 Coll. on protection against money laundering and terrorist financing and on the amendment of certain acts, as amended.  <b>Retention period:</b> for the period necessary under the relevant legislation; for bookkeeping 10 years from the registration of the relevant accounting document; for ordinary correspondence 5 years from the closure of the file; we store and discard your personal data for this purpose, as for other purposes, we store and discard your personal data in accordance with our records management plan. In the prevention and detection of money laundering, protection against terrorist financing and the implementation of international sanctions, 5 years from the end of the relationship with the client or from the execution of an occasional transaction outside a business relationship, unless the Financial Intelligence Unit specifies a longer period.
<b>Purpose of processing:</b> complaints handling.  <b>Category of personal data:</b> a) ordinary personal data, in particular basic identification data and contact person data (name	<b>Legal basis:</b> compliance with our legal obligation (Article 6(1)(c) of the Regulation).  <b>Retention period:</b> 5 years after closure of the insurance claim file.

<sup>1</sup> Whether you enter into public health insurance with our health insurance company is voluntary, but personal data for this purpose which is not marked as optional is data whose provision to us is mandatory under the relevant legislation, i.e. the provision of data for this purpose is a prerequisite for the creation or change of public health insurance and its non-provision or incomplete provision may result in our refusal to accept an application for public health insurance. The personal data that can be processed without the consent of the data subject in the provision of public health insurance is defined as: forename, surname, birth surname, address of permanent residence, address of temporary residence, birth ID no., date of birth, nationality (citizenship), type and number of identity document, personal data from the identity document, information on the insured person's health condition and information provided to the health insurance company by public authorities for the purposes of the annual settlement of insurance contributions (e.g. tax return, start and end date of study, start and end date of entitlement to benefits or a pension, start and end dates of registration as a jobseeker). If you apply for public health insurance electronically using an electronic (digital) signature, we also process personal data relating to the biometric characteristics of your signature, namely the total length of lines in the signature, the average speed of signing, the total time needed to enter the signature, the number of interruptions or the number of points captured per second.



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and surname, title, address, e-mail, telephone number), b) other personal data of a special category (e.g. relating to health) related to complaints handling.	
<b>Purpose of processing:</b> prevention and detection of antisocial activities (fraud assessment).  <b>Category of personal data:</b> a) ordinary personal data, in particular basic identification data and contact person data (name and surname, title, address, e-mail, telephone number), b) other personal data, which may also be special category data, related to the processing of the background check.	<b>Legal basis:</b> - compliance with our legal obligation (Article 6(1)(c) of the Regulation); - our legitimate interest (Article 6(1)(f) of the Regulation); we carry out such processing in the interests of the prevention and detection of crime or other undesired antisocial activities, and you have the right to object to such processing. <b>Retention period:</b> 10 years after the end of the investigation.
<b>Purpose of processing:</b> exercising our claims and defending our rights.  <b>Category of personal data:</b> a) ordinary personal data, in particular basic identification data and contact person data (name and surname, title, address, e-mail, telephone number), b) other special category personal data (e.g. relating to health) related to the handling of our claims and the defence of our rights.	<b>Legal basis:</b> - compliance with our legal obligation (Article 6(1)(c) of the Regulation); - our legitimate interest (Article 6(1)(f) of the Regulation). We carry out such processing for the purpose of establishing, exercising, and defending our legal claims. You have the right to object to such processing at any time.  <b>Retention period:</b> 10 years from closure of the insurance claim file or until the expiry of the limitation period.
<b>Purpose of processing:</b> recording phone calls to our customer call centre  <b>Category of personal data:</b> a) ordinary personal data, in particular basic identification data and contact person data (name and surname, title, address, e-mail, telephone number), b) other personal information, including personal data of a special category (e.g. relating to health status) related to telephone call handling.	<b>Legal basis:</b> our legitimate interest (Article 6(1)(f) of the Regulation), wherein we perform such processing so that we can improve the services we provide to you and to enable us to prove and defend our claims. You have the right to object to such processing at any time.  <b>Retention period:</b> 5 years from the creation of the recordings.
<b>Purpose of processing:</b> direct marketing – informing our existing clients about news regarding their insurance relationship and about our benefits and services, including profiling.	<b>Legal basis:</b> our legitimate interest (Article 6(1)(f) of the Regulation), wherein we perform such processing for the purpose of informing you in particular about benefits, services and offers, included targeted



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<b>Category of personal data:</b> ordinary personal data (name and surname, title, residential address, e-mail, telephone number).	marketing. You have the right to object to such processing at any time.  <b>Retention period:</b> for the duration of the insurance contract or until you object to such processing.
<b>Purpose of processing:</b> satisfaction survey.  <b>Category of personal data:</b> ordinary personal data (name and surname, title, residential address, e-mail, telephone number).	<b>Legal basis:</b> 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.  <b>Retention period:</b> 3 months from the survey being conducted.
<b>Purpose of the processing of personal data where your consent is required (except for essential cookies)</b>	<b>Legal basis for processing personal data and retention period where your consent is required</b>
<b>Purpose of processing:</b> marketing offers – product offers, newsletters and competitions, including profiling, for which there is no legitimate interest as a legal basis.  <b>Category of personal data:</b> common personal data (name and surname, title, residential address, e-mail, telephone number or other specified in the consent).	<b>Legal basis:</b> your consent (Article 6(1)(a) of the Regulation); you may withdraw your consent at any time, without retroactive effect.  <b>Retention period:</b> 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.
<b>Purpose of processing:</b> ensuring the security and functionality of web services (essential cookies without consent), evaluating website visitor behaviour and personalising website content (consent-based). evaluating website visitor behaviour and personalising website content (consent-based).  <b>Category of personal data:</b> cookies and IP addresses.	More information about such processing can be found on our website here: <a href="https://www.union.sk/vyuzivanie-cookies">https://www.union.sk/vyuzivanie-cookies</a>

### 6. How do we collect personal data?

We collect your personal data primarily from you. We may also obtain your personal data from other persons, where necessary for the performance of our obligations and duties, e.g. from the National Health Information Centre, healthcare providers, other health insurers, the police, and public authorities (e.g. Social Insurance Agency, SR Ministry of Interior).

### 7. Recipients and categories of recipients of personal data

Your personal data may be disclosed or provided to recipients under generally applicable law who have the status of independent controllers and/or joint controllers or, for the purposes set out in point 5 above; we may entrust the processing of your personal data to processors who are authorised to process personal data on our behalf and at our instructions. Your personal data may be provided, in particular, to:

- our sister company Union poisťovňa, a.s., corporate ID: 313220511 and our parent company Achmea B.V., The Netherlands, corporate ID: 33235189;
- healthcare providers,
- to other health insurers,
- Social Insurance Agency,
- to the Financial Administration (tax authorities),





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- Healthcare Supervision Office,
- SR Ministry of the Economy, SR Ministry of Finance,
- National Health Information Centre,
- other public authorities (in particular courts, law enforcement authorities, police force, bailiffs),
- companies acting for and for the benefit of our company in connection with the exercise of rights resulting from public health insurance,
- companies providing services related to correspondence between our company and data subjects,
- companies providing information technology services;
- a company that provides document digitisation for our company;
- a company that prints and distributes insurance cards,
- a company performing archiving centre and registry administration,
- a company that evaluates surveys of satisfaction with our services,
- to our external auditor,

## 8. Your rights as a data subject

If we process personal data about you, you have the following rights in relation to us under the Regulation, unless otherwise provided for by generally applicable law (the Regulation sets out your rights in Articles 12 to 22):

- 8.1. the right to obtain confirmation as to whether your personal data is being processed and, if so, the right to obtain access to that personal data pursuant to Article 15 of the Regulation, together with the information set out in this notice;
- 8.2. the right to rectification and completion of your personal data pursuant to Article 16 of the Regulation;
- 8.3. the right to erasure ("forgetting") of your personal data if they are no longer necessary for the purposes for which they were collected or otherwise processed pursuant to Article 17 of the Regulation;
- 8.4. the right to have us restrict the processing of your personal data where one of the cases under Article 18 of the Regulation is met;
- 8.5. the right to obtain the personal data concerning you that you have provided to us and the right to transfer that data to another controller pursuant to Article 20 of the Regulation;
- 8.6. **the right to object to the processing of your personal data by us and/or to lodge a complaint at any time; you have the right to object under Article 21 of the Regulation if we process your personal data on the basis of a legitimate interest, as well as if we process it for direct marketing purposes, including profiling;**
- 8.7. the right to object to and not to comply with our decision which would have legal effects or significant impact on you, if such decision is based solely on automated processing of personal data pursuant to Article 22 of the Regulation; you have the right to ask us to review the decision made by a method other than automated processing, and we are obliged to comply with such a request, with our staff playing a decisive role in the review of the decision; we will inform you of the manner of the review and the outcome of the finding within 30 days of receipt of the request;
- 8.8. the right to request proof of identity of the person responsible for collecting personal data;
- 8.9. if your personal data has been connected from a source other than you, you have the right to obtain information about the source of your personal data, or information about whether the data comes from publicly available sources.

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

- a) in writing at our registered office: Union zdravotná poisťovňa, a. s., Karadžičova 10, 814 53 Bratislava, Slovak Republic or in writing at the following email address [dataprotection@union.sk](mailto:dataprotection@union.sk);
- b) in person in spoken form in a memorandum, which must show who exercised the right, what you claim, when and who made the memorandum, their signature, and your signature; we will give you a copy of the memorandum;
- c) at an intermediary, who will then forward your request or memorandum to us for handling.



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**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 our processing of your personal data is in contravention of data protection legislation.

**10. Does the processing of your personal data involve automated individual decision-making or profiling?**

10.1. Our company uses profiling – automated personal data processing tools for the purpose of evaluating certain aspects of your personal data for the following purposes/sub-purposes:

10.2 Our company uses profiling related to marketing outreach in the form of targeted marketing offers;

10.3. Entitlement to some benefits (e.g. dental benefit or breath monitor allowance) is the result of automated individual decision-making without human intervention. In the case of a decision based solely on automated processing of personal data, including profiling, you have the rights referred to in point 8.7 of this document.

**11. Personal data shall not be published.**

**12. Transfer of personal data**

Our company mainly transfers your personal data to recipients in countries of the European Union, countries that are party to the Agreement on the European Economic Area and Switzerland. We will transfer 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 absence of such a decision, only if the controller or processor has provided adequate safeguards and if you have enforceable rights and effective legal remedies, or if additional security measures have been taken in relation to the transfer of your personal data.

As part of some marketing communications and data backup, our company also uses major service providers such as Google, Facebook, Microsoft, namely Google LLC, Meta Platforms, Inc., and Microsoft Corporation. These contractors are from the USA and the transfer of personal data to these entities is based on the European Commission's adequacy decision adopted on 10 July 2023, concerning the EU-US Data Privacy Framework under Article 45 of the Regulation. USA contractors participating in this framework and to whom personal data can be securely transferred from the EU without the need to implement additional privacy safeguards can be found at: <https://www.dataprivacyframework.gov/s/participant-search>, listing the respective contractors and their privacy protection policy.

**13. Updating basic information on data protection for the data subject**

Our company has the right to update the following basic data protection information for the data subject from time to time, and the current version of this information is always available on the website [www.union.sk](http://www.union.sk) under the Privacy Policy.