



Zdravotná poisťovňa

Union zdravotná poisťovňa, a. s.
Karadžičova 10
814 53 Bratislava
IČO: 36284831
DIČ: 2022152517
Spoločnosť zapísaná v obchodnom registri
Okresného súdu Bratislava I, odd. Sa, vl. č. 3832/B

Basic information on personal data protection for data subjects
Intended for insured persons and the payers of insurance premiums

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. **The information is relevant to you if you are insured with us, if you pay us insurance premiums, if you are the legal or authorised representative of an insured person or the authorised representative of a person paying insurance premiums.**
2. The **data controller** is 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 (“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 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.
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 public health insurance 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
Provision of public health insurance. The provision of public health insurance includes activities to ensure the safe and efficient delivery of health care with an appropriate level of quality and providing you with advice.	The legal basis for the processing of your personal data is Article 6(1)(c) and (f) of the GDPR, 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. This means that we do not require your consent for personal data processing in these matters. The provision of personal data is obligatory unless the text expressly indicates that it is not obligatory. ¹

¹ The list of personal data that can be processed without the consent of the data subject is defined as follows: 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, contact telephone number, fax number and e-mail address, 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, the start and end dates of registration as a jobseeker).



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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. This means that we do not require your consent for personal data processing in these matters.
Complaint handling	The legal basis for the processing of your personal data is Article 6(1)(c) of the GDPR. This means that we do not require your consent for personal data processing in these matters.
Prevention and detection of money laundering and terrorist financing	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. 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.
Prevention and detection of anti-social activity (fraud assessment)	The legal basis for the processing of your personal data is Article 6(1)(c) and (f) of the GDPR and other applicable legislation, because such processing is carried out for the prevention and detection of crime or other undesirable anti-social activities. This means that we do not require your consent for personal data processing in these matters.
Enforcing our claims and defending our rights	The legal basis for the processing of your personal data is Article 6(1)(c) and (f) of the GDPR because we conduct such processing to prove, assert and defend our legal claims. This means that we do not require your consent for personal data processing in these matters.
Recording of telephone calls to our customer centre (call centre)	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. This means that we do not require your consent for personal data processing in these matters.
Marketing offers – the offer of products, the sending of newsletters and competitions, whereas such processing includes profiling	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.

If you submit an application form 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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Direct marketing – providing existing clients up-to-date information on our services, including our benefit programme for clients, whereas such processing includes profiling	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.
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 your personal data primarily from you. We may also obtain your personal data from other persons when doing so is necessary for our commitments and obligations, e.g., from the National Health Information Centre, health care providers, other health insurance companies, the police and public authorities (e.g., the Social Insurance Agency, the Ministry of Interior of the Slovak Republic).

6. Personal data recipients

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

- our sister company Union poisťovňa, a.s., ID no.: 31322051 and our parent company Achmea BV, Netherlands, ID no.: 33235189,
- health care providers,
- other health insurance companies,
- Social Insurance Agency,
- Financial administration (tax office)
- Health Surveillance Authority
- National Health Information Centre
- Ministry of Health and Ministry of Finance of the Slovak Republic,
- other public authorities,
- companies that act on behalf of our company in the exercise of rights relating to public health insurance,
- 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 print and distribute insurance cards: Any Security Printing Company PLC, Hungary,
- 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,



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- 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.

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 shall store your personal data during the provision of public health insurance and for 15 years from the date of termination of the provision of public health insurance or the provision of health care in the Slovak Republic, or the death of a natural person or the date when a natural person is declared dead, whichever occurs earlier. The storage period can be prolonged if we exercise a right in relation to public health insurance, or if such a right is exercised against us. In which case, storage shall continue to the expiry of the limitation period.

The personal data of potential clients is processed 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 for the duration of the insurance relationship or until you 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



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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 written 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 situation, health, personal preferences, interests, reliability, behaviour, location or movements. The personal data of a data subject is usually processed in this way for the provision of consultation for the data subject, decisions on various claims of data subjects and the recovery of contributions for public health insurance. 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. The personal data will not be made public except in the case of publication in the list of debtors under Sections 25 and 25a of Act No 580/2004 on health insurance, as amended.
11. **Transfer of personal data**
Our company foresees the transfer of 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). Our company will not transfer your personal data to third countries.
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.