

# Principles for the Processing of Personal Data **GDPR**

Dear Sir or Madam,

Slavia pojišťovna a.s., Company ID 60197501, with its registered office at Táborská 940/31, Prague 4, 140 00, registered in the Commercial Register maintained by the Municipal Court in Prague, Section B, Insert 2591 (hereinafter also referred to as 'Slavia' or the 'Insurance Company') hereby informs you that 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 General Data Protection Regulation), which is directly effective also under the law of the Czech Republic, entered into force on 25 May 2018.

Our Insurance Company acceded to the Self-Regulatory Standards of the Czech Insurance Association (ČAP) for the application of the General Data Protection Regulation (the GDPR) in the insurance industry, as amended (hereinafter referred to as the 'ČAP Standards') and processes personal data fully in accordance with these ČAP Standards. The ČAP Standards represent uniform rules for the protection and processing of personal data by member insurance companies.

The processing of personal data is important to our Insurance Company and their protection is our primary responsibility, so we want to provide you with complete and understandable information regarding the purposes and legal titles for processing personal data and your rights in relation to the processing of personal data.

Please read the content of these Principles for the Processing of Personal Data. If anything is unclear to you or if you want to explain some information in more detail after reading the document, please call +420 255 790 111 or send an email to <u>poverenec@slavia-pojistovna.cz</u> or send a letter to Slavia pojišťovna a.s., Táborská 940/31, 140 00 Prague 4.

The current version of these Principles is always published on our website <u>www.slavia-pojistovna.cz/ochrana-osobnich-udaju</u>; the Insurance Company reserves the right to change or modify them at any time, without prior notice.

Slavia pojišťovna a.s.

...Your partner for a happy life

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1. Glossary of terms

We would like to introduce you to the basic terms that will be used in the text:

- **GDPR** 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 General Data Protection Regulation)
- Act on Insurance and Reinsurance Distribution Act No. 170/2018 Sb., on the Distribution of Insurance and Reinsurance, as amended
- Act on Electronic Communications Act No. 127/2005 Sb., on Electronic Communications, as amended
- Act on the processing of personal data Act No. 110/2019 Sb., on the Processing of Personal Data, as amended
- Data subject a natural person to whom personal data relate or whose personal data are processed
- **Personal data** any information relating to an identified or identifiable natural person, such as first name, surname, date of birth, birth certificate number, telephone number, email address, IP address, etc.
- Special categories of personal data personal data that are of a special nature, such as health data or genetic data
- **Processing of personal data** any activity that the controller or processor carries out with personal data, such as collection, storage, use, erasure
- **Profiling** any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to the data subject, such as the need for an individual risk assessment
- **Controller** an entity that determines the purpose and means of processing personal data; for the purposes of these Principles, Slavia pojišťovna a.s. is always the Controller
- Processor an entity that processes personal data for the controller
- **Recipient** a person to whom personal data are disclosed
- Purpose the reason for which the controller or processor processes personal data
- Client a party to the contractual relationship whose personal data are processed by the Insurance Company
- Injured a person whose personal data are processed by the Insurance Company in connection with the settlement of a loss event
- Identification data personal data used to identify the data subject, such as first name, surname, birth certificate number
  or date of birth, address, type and number of personal document, IP address, citizenship, nationality, signature and, for
  natural persons doing business, also company ID, tax ID and registered office
- Contact details personal data intended to contact the data subject, such as telephone number, email address, contact address
- Sociodemographic data data of a statistical nature, such as age, gender, education
- Location data geolocation data, such as a mobile device when you install our application on your mobile device
- **Cookies** data files or other similar technology used to store information on a computer, tablet, phone or other device that the user uses to browse the website or mobile application or to read information from such a device
- **Direct marketing** targeted communication consisting of direct contact between the Insurance Company and the data subject, on the basis of which the insurance offer is made. This includes active telemarketing, etc.
- Insurance insurance products and services

# 2. Identity and contact details of the Controller and the Data Protection Officer

The data controller is Slavia pojišťovna a.s., Company ID: 601 97 501, with its registered office at Prague 4, Táborská 940/31, 140 00, registered in the Commercial Register maintained by the Municipal Court in Prague, Section B, Insert 2591.

You can contact us by calling +420 255 790 111 or sending an email to info@slavia-pojistovna.cz

or a letter to Slavia pojišťovna a.s., Táborská 940/31, 140 00 Prague 4.

Contact details of the Data Protection Officer: email address <u>poverenec@slavia-pojistovna.cz</u>; correspondence address: Slavia pojišťovna a.s., Personal Data Protection Department, Táborská 940/31, 140 00 Prague 4.

## 3. Categories of personal data

In accordance with the principle of minimisation, we only work with relevant personal data that we need for preparing an insurance offer, concluding an insurance contract and providing our services. The processing of these data may also concern other persons if required by the characteristics of individual products, e.g. the employer, or if necessary for the performance of insurance activities, e.g. the injured, external liquidators.

We process the following types of personal data:

- Identifying data
- Contact data

The Insurance Company may use the details of electronic contact for the purposes of disseminating commercial communications pursuant to Act No. 480/2004 Sb., on Certain Information Society Services, related to its own similar products or services. If you do not agree with such use of your electronic contact, you may refuse the sending of such messages in advance by email to poverenec@slavia-pojistovna.cz;

- Sociodemographic data
- Information on the use of products mainly information on what products you use or have used with us, on the basis of which we can recommend you the optimal insurance offer;
- Location data used to recommend contact with the nearest insurance intermediary, our branch, assistance service or our contractual service in the event of a breakdown or loss event;
- Data processed in connection with the performance of the insurance contract and the use of services including, in particular, transaction data regarding the arrangement and use of services, the assignment of a client identifier, payment of insurance premiums, information from recordings of telephone calls or other contact with you or camera recordings;
- Health data including genetic data we process health data for selected products for the purpose of preparing an insurance offer, concluding a contract, settling claims and the resulting payment of benefits;
- **Data on crime** in accordance with Article 10 of the GDPR, i.e. in accordance with the provisions of Act No. 141/1961 Sb., the Criminal Procedure Code, and Act No. 218/2003 Sb., on Juvenile Justice. This is without prejudice to the Insurance Company's obligation to share data pursuant to the provisions of Section 129b of Act No. 277/2009 Sb., on Insurance;
- Data related to the subject of insurance or the insured for example, vehicle registration of the insured vehicle;
- Data on creditworthiness and credibility we process this data with a view to minimizing the risk arising from insurance activities;
- Data to determine the needs and requirements of the client in accordance with the Insurance and Reinsurance Distribution Act;
- Monitoring data e.g. data obtained on the basis of records of meetings, records of telephone calls, records of the use of
  online services, records of communication with clients and browsing the website of the Insurance Company, data on sent
  commercial communications, data from mobile applications;
- Data for underwriting purposes such as profession, education, sports and hobbies;
- **Personal data obtained during the provision of performance and use of services** in particular during the investigation of a loss event and the provision of insurance benefits (e.g. description of the loss event, etc.);
- Information from publicly available registers

## 4. Purposes of the processing of personal data

In accordance with the ČAP Standards, we process your personal data to the appropriate, relevant and limited extent and only for the time necessary to fulfil the following purposes:

- Performance of insurance and reinsurance activities and activities arising therefrom
  - negotiations on the contractual relationship concerning, in addition to the conclusion of the insurance contract itself, the preparation of modelling and proposals;
  - identifying the needs, objectives and requirements of the client; these data are necessary to meet the legal obligation to provide the recommendation to the client so that they can properly decide whether to take out or substantially change the insurance;
  - underwriting and valuation of insurance risk and determination of insurance premiums in the appropriate amount;
  - distribution of insurance risk in the form of arranging reinsurance or co-insurance and transfer of personal data to reinsurance companies;
  - insurance management and termination of the insurance contract;
  - fulfilment of obligations under the insurance contract, investigation of loss events, provision of benefits under insurance contracts and provision of assistance services;
  - preparation of statistics and actuarial studies for the purpose of pricing;
  - risk assessment and management by various methods, including profiling and scoring;
  - verification of the conditions governing the determination of the amount of insurance premiums for motor third party liability insurance at the Czech Insurers' Bureau;

- Compliance with the requirements of supervisory and other state authorities and compliance with legal obligations arising from special legal regulations (in particular Act No. 277/2009 Sb., on Insurance, Act No. 168/1999 Sb., Motor Third Party Liability Insurance, Insurance and Reinsurance Distribution Act, etc.);
- Protection of the Insurance Company's rights and interests (e.g. debt and recourse recovery);
- Prevention and detection of insurance fraud and other infringements;
- Internal administrative needs of the Insurance Company;
- Offering own products and services (direct marketing);
- Addressing potential clients (those interested in insurance);
- Transfer of personal data within the group of companies for internal administrative purposes;
- Evaluation of the quality of services offered;
- Further according to your consent to the processing of personal data.

## 5. Legal basis for the processing of personal data

In accordance with the ČAP Standards and the principle of legality, we process your personal data only on the basis of the following legal grounds:

#### • Processing where your consent is not required

Providing your personal data is voluntary, but necessary for the preparation of the insurance offer, conclusion of the insurance contract, its subsequent management and settlement of a possible loss event. The insurance contract cannot be concluded and the resulting rights and obligations cannot be fulfilled without these data.

- Processing necessary for the performance of a contract or for the implementation of pre-contractual measures
   The processing of personal data necessary for the performance of the insurance contract takes place during the entire
   process of concluding the contract and for the duration of the insurance, in particular in the following situations:
  - negotiations on the conclusion of the insurance contract and the assessment of the insurance risk,
  - conclusion of the insurance contract and its management,
  - recording of telephone calls and electronic communications for the purpose of concluding an insurance contract and fulfilling contractual obligations under it (e.g. calls related to a specific insurance contract or an loss event, complaints about the Insurance Company's procedure in matters related to the concluded insurance contract, calls of potential clients (persons interested in insurance) to receive information before concluding an insurance contract, etc.),
  - investigation of loss events,
  - provision of benefits under the insurance contract.

Please note that when preparing an insurance offer and managing the contract, profiling takes place in order to optimally evaluate insurance risks and determine the amount of insurance premiums. The information provided is the criteria for calculating the premium. In some cases, automated individual decision-making may occur, including profiling, which is necessary for the conclusion or performance of a contract between the data subject and the Insurance Company.

#### - Processing necessary to comply with legal obligations

When conducting insurance business, the Insurance Company must process personal data for the fulfilment of legal obligations imposed on it by Czech or EU law:

- identifying the client's requirements, objectives and needs for the purpose of providing recommendations,
- keeping documents and records of meetings,
- providing cooperation to the Czech National Bank, courts, law enforcement authorities, bailiffs, notaries, insolvency administrators and other public authorities in accordance with applicable law,
- compliance with obligations arising from the application of international sanctions,
- compliance with obligations in the protection of whistleblowers,
- compliance with obligations for motor third party liability insurance, including keeping statutory records of data and related transfer to the Czech Insurers' Bureau,
- mutual information and sharing of information between insurance companies to prevent and detect insurance fraud and other infringements,
- collecting information concerning persons subject to tax obligations in another state and transferring these data to the competent tax authorities,
- fulfilment of legal obligations arising from valid and effective Czech and EU regulations in archiving and file services.
- **Processing necessary for the purposes of the legitimate interests pursued by the Insurance Company or by a third party** The legitimate interest of the Insurance Company or a third party is in particular:
  - processing of personal data of non-contracting parties;
  - The Insurance Company may process personal data of persons who are not a party to the insurance contract, in particular the insured ones, under individual and group insurance, beneficiaries, injured parties and other entities whose personal data are necessary for the performance of insurance activities,
  - protection of the Insurance Company's rights and interests;

The Insurance Company processes personal data to protect its rights and legal claims to the extent necessary in court proceedings or proceedings before out-of-court dispute resolution bodies, in the recovery of insurance premiums due, recourse penalties and the recovery of other claims,

- prevention and detection of insurance fraud and other infringements,
- transfer of personal data to processors,
- making and processing camera recordings at the Insurance Company's registered office and at its branches,
- making and processing electronic communication, including recordings of telephone calls;
- For the purposes of the legitimate interests referred to in the previous bullets, the Insurance Company records telephone calls and processes personal data from these records. Call records are stored and protected in a way that ensures that they are not available to unauthorized persons and the Insurance Company has taken the necessary measures to prevent unauthorized handling of such stored personal data. The Insurance Company may provide records to law enforcement authorities only on the basis of the law and within its limits,
- transfer of personal data within a group of undertakings for internal administrative purposes,
- processing of personal data for audits or internal regulations,
- processing of personal data for the redistribution of risks by reinsurance or co-insurance,
- processing for direct marketing purposes, i.e. informing clients about new insurance products and services, offering products of the Insurance Company the client of which is the data subject.

#### - Processing necessary for the establishment, exercise or defence of legal claims

Where necessary for the establishment, exercise or defence of legal claims, the Insurance Company processes special categories of personal data, in particular data concerning health and genetic data, for the following purposes:

- fulfilment of obligations under the insurance contract, investigation of a loss event and provision of benefits under insurance contracts,
- management and termination of the insurance contract,
- prevention and detection of insurance fraud and other infringements,
- protection of the Insurance Company's rights and interests.

#### • Processing with your consent

Consent to the processing of personal data is required by the Insurance Company only in situations where it is not possible to process personal data on a different legal basis.

- Addressing potential clients (those interested in insurance)

The Insurance Company contacts data subjects who are not clients of the Insurance Company, i.e. persons interested in insurance, through electronic mail on the basis of their prior consent, which was granted directly to the Insurance Company (e.g. a potential client fills in the online form available on the website) or obtained through the referrer (e.g. a potential client gives their consent on a form that the referrer submits to the Insurance Company). Consent may also be given orally.

- Fully automated individual decision-making pursuant to Article 22 of the GDPR, including profiling, unless another legal title applies
- Processing for indirect marketing purposes
  - transferring personal data to third parties for the purpose of sending marketing communications with which the data subject does not have a relevant existing relationship,
  - sending third party marketing communications.
- Processing of special category of personal data for the purposes of:
  - negotiations on the contractual relationship, conclusion of the insurance contract, preparation of modelling and proposals, identification of the client's needs and requirements,
  - underwriting and valuation of insurance risk and determination of insurance premiums.

Your consent is voluntary, but without it you cannot take out insurance for which we need to know health data before entering into the insurance. If you do not consent to the processing of a special category of personal data for selected products, we cannot prepare an insurance offer and conclude an insurance contract with you. After the conclusion of the insurance contract, further processing of personal data is not bound to your consent.

#### - Processing the behaviour of data subjects through cookies

The Insurance Company accesses the user's device and uses cookies in accordance with the requirements set out in the Electronic Communications Act. If personal data are processed through cookies, the Insurance Company also proceeds in accordance with the requirements of the GDPR.

The Insurance Company uses cookies based on the user's consent, except in cases where access to the user's device is necessary for 'technical storage', 'for the purposes of transmitting a communication over an electronic communications network' or 'as strictly necessary in order to provide an information society service explicitly requested by the subscriber or user'.

Strictly necessary cookies, which can be used without the user's consent, include cookies used to remember information between individual pages (e.g. within a multi-step form) and cookies used to ensure the security of data and communication or those containing information about the choices made by the user in relation to the use of cookies. The user is then allowed to consent to the use of statistical and marketing cookies that provide additional functions. The period of using cookies is specified on the website of the Insurance Company in the Cookies Settings section. - Processing of telephone calls to improve the quality of services

You give your consent before starting your own call. If you do not agree to the recording, please use another method of communication.

Your consent is entirely voluntary, but necessary for all the processing described above. You have the right to withdraw your consent to the processing of personal data at any time.

#### The withdrawal of consent must include:

- Name and surname, date of birth, address of residence of the data subject so that we can identify you
- Telephone number and email address
- Specify which consent to the processing of personal data you wish to withdraw
- Date on which you wish to withdraw your consent, your signature

You can withdraw your consent by calling + 420 255 790 111, sending an email to <u>poverenec@slavia-pojistovna.cz</u>, in writing to Slavia pojišťovna a.s., Personal Data Protection Department, Táborská 940/31, 140 00 Prague 4 or in person at any of our branches, a list of which can be found at <u>https://www.slavia-pojistovna.cz/cs/pobocky/</u>. We recommend using the form available online at <u>www.slavia-pojistovna.cz/ochrana-osobnich-udaju</u>.

Please note that the withdrawal of consent does not affect the lawfulness of the processing of your personal data based on the consent given prior to its withdrawal.

## 6. Transfer of personal data to third countries

#### As a rule, the Insurance Company transfers personal data to third countries in the following situations:

- Arranging reinsurance or fulfilling obligations under reinsurance contracts As a rule, the Insurance Company transfers a minimum of personal data or pseudonymised personal data. However, in rare cases, a larger amount of personal data may be transferred, for example, if needed to arrange over-limit reinsurance or if the limit of insurance benefits is exceeded, which must be independently assessed by the reinsurer.
- Provision of assistance services especially in the case of travel insurance or the use of an international assistance provider
- IT services

## 7. Time period for the processing of personal data

#### Performance of insurance activities and activities arising therefrom:

In the case of a potential client, i.e. a person interested in insurance, the Insurance Company processes personal data until the end of the second calendar year from the last communication with such a client if the insurance has not been taken out by that time.

If an insurance contract is concluded, the Insurance Company is obliged to process personal data and keep documents and records related to the insurance mediation at least for the duration of the contractual relationship and 10 years after its termination, unless the Insurance and Reinsurance Distribution Act or other regulations provide for a longer period. Such documents or records include the processing of personal data related to risk underwriting, profiling or scoring.

The Insurance Company will make reasonable efforts to use pseudonymisation or anonymisation of personal data for the purpose of producing statistics and actuarial studies for the purpose of pricing.

• Compliance with the requirements of supervisory and other state authorities and compliance with legal obligations arising from special regulations:

For these purposes, the Insurance Company determines the period for the processing of personal data in accordance with special legal regulations. These personal data also include personal data obtained during the inspection of the client in order to fulfil legal obligations related to measures against the legitimisation of proceeds of crime or tax legislation.

#### • Protection of the Insurance Company's rights and interests (e.g. debt and recourse recovery):

The Insurance Company processes personal data in order to protect its rights and legal claims:

- for two years after the expiry of the limitation period for a possible claim of the Insurance Company or third parties against the Insurance Company arising from an insurance contract, from the recognition of a debt or arising from other contractual or tort obligations or other legal facts (in general, this will be a fifteen-year limitation period, for example);
- for the duration of civil proceedings, administrative proceedings, special legal proceedings or other proceedings related to the financial or other legitimate interest of the Insurance Company and time limits related to the enforcement of the decision;
- for as long as any other legal claims of the Insurance Company, members of the Insurance Company's bodies, their employees, intermediaries, business partners, clients or other third parties can be asserted under the law.
- Internal needs of the Insurance Company, i.e. internal administrative needs of the Insurance Company: The Insurance Company processes personal data based on its internal needs for the entire duration of the contractual relationship and for the duration of possible legal claims arising from it and for a reasonable period of time in order to protect the Insurance Company's legitimate interests.

#### • Prevention and detection of insurance fraud and other infringements:

The Insurance Company processes personal data for the duration of the investigation of insurance fraud or other potential criminal activity, criminal proceedings and time limits related to the enforcement of the decision and for up to two years after the expiry of the limitation period for liability for infringement or possible claims of the Insurance Company or third parties against the Insurance Company under the insurance contract, from the recognition of a debt or resulting from other contractual or tort obligations or other legal facts (in general, this will usually be a limitation period of up to fifteen years).

#### • Offering own services (direct marketing):

If the data subject does not object to such processing, the Insurance Company processes personal data for the duration of the contractual relationship, but no longer than 1 year after its termination.

#### • Reaching out to potential clients:

The Insurance Company may process the personal data of potential clients, i.e. persons interested in insurance, based on consent until its possible withdrawal, unless the consent was granted only for a definite period.

#### • Transfer of personal data within the group of companies for internal administrative purposes:

The Insurance Company processes personal data based on the needs of the group of companies for the entire duration of the contractual relationship and for the duration of possible legal claims arising from it and for a reasonable period of time in order to protect the Insurance Company's or the group's rights and legitimate interests.

#### • Evaluation of the quality of services offered:

The Insurance Company processes personal data regarding the evaluation of the quality of the services offered for the entire duration of the contractual relationship. The Insurance Company will reduce the storage period to a minimum when assessing the quality of the services provided and the use of statistics and will make reasonable efforts to use pseudony-misation or anonymisation for these processing purposes.

## 8. Legitimate interests of the Insurance Company

The legitimate interest of the Insurance Company is:

- Processing of personal data for direct marketing purposes, i.e. offering the company's products to the client which is the data subject. You have the right to object to this processing of personal data at any time. If you choose to object, your personal data will not be further processed for these purposes.
- Acquisition and processing of camera recordings at the Insurance Company's registered office and its branches to
  ensure the safety and protection of premises, property, persons and interests of the Insurance Company, clients and third
  parties.
- Making and processing electronic communication, including recordings of telephone calls
- Protection of the Insurance Company's rights and interests
- Processing of personal data of non-contracting parties
- Transfer of personal data to processors
- Transfer of personal data within the group of companies for internal administrative purposes
- Processing of personal data for audits or internal regulations
- Processing of personal data for the redistribution of risks by reinsurance or co-insurance
- Prevention and detection of insurance fraud and other infringements

## 9. Recipients of personal data

We provide personal data to:

- Entities as required by law, such as courts, law enforcement authorities, the Czech National Bank, etc.
- Other insurance companies for the purpose of preventing and detecting insurance fraud and other unlawful acts in accordance with the Insurance Act
- Other entities if it is necessary for the protection of the Insurance Company's rights and interests
- Processors

## **10. Source of personal data**

We collect your personal data:

- **Directly from you** when preparing an insurance offer, concluding an insurance contract, during the term of the insurance contract or when reporting a loss event
- **Through our business partners** to whom you disclose your data in order to prepare an insurance offer and conclude an insurance contract or when updating data and reporting a loss event
- From other persons if you give your consent, for example from medical institutions if it is necessary for the settlement of a loss event, from the injured persons, public authorities or if it is provided for by law, for example by the Insurance Act
- From publicly available sources, such as the Cadastre of Real Estate, insolvency or other register

## **11. Rights of the data subject**

Under the GDPR, you have the following rights:

#### • The right to be informed

You have the right to be provided with concise, clear, understandable and easily accessible information free of charge by the company.

#### The right of access to personal data

You have the right to request confirmation from the Insurance Company as to whether or not your personal data are processed by us. If we process your personal data, you have the right to the following information about:

- the purpose of the processing
- the categories of personal data concerned
- the recipients of the personal data
- personal data retention period
- the right to request rectification, erasure of personal data, restriction of processing or the right to object to processing
- the right to lodge a complaint with the Office for Personal Data Protection
- sources of personal data
- whether there is automated decision-making and profiling

We will provide you with the first confirmation of this information free of charge, with additional copies for a reasonable fee. Please note that this right does not apply to personal data that could jeopardize criminal investigations, trade secrets or personal data that may adversely affect the rights and freedoms of others.

#### • The right to rectification of personal data

You have the right to request the rectification of your inaccurate personal data or the completion of incomplete personal data. This right does not apply to personal data related to the prevention and investigation of insurance fraud or activities related to the fight against money laundering and financing of terrorism or for other legal reasons, insofar as this is expressly excluded in relation to such data.

#### • The right to erasure

You have the right to have your personal data erased without undue delay if, for example:

- they are no longer necessary for the purposes for which they were processed,
- you withdraw your consent to their processing and there is no other legal ground for it,
- you object to the processing of personal data for a specific purpose and this objection will be successful.

Please note that this cannot be used if the company is authorized to process personal data on the grounds of another legal title or for another purpose.

#### • The right to restrict processing

You have the right to restrict the processing of your personal data, in particular in the following cases:

- if you contest the accuracy of your personal data, for the period of time necessary for us to verify its accuracy,
- the processing is unlawful and you refuse to have them erased,
- the company no longer needs to process your personal data, but you require their processing for the purpose of determining, exercising or defending your legal claims,
- if you have objected to the processing of personal data, until the Insurance Company verifies whether its legitimate reasons outweigh your legitimate reasons.

You will be notified in advance of the lifting of the processing restriction.

#### • The right to portability

You have the right to transfer your data to another controller under the following cumulative conditions:

- these are personal data that you have provided to us, for example in a loss event notification form or a medical report sent to us,
- the exercise of this right will not adversely affect the rights of third parties,
- the processing is based on your consent or on the performance of a contract and takes place automatically.

The company will provide copies of your personal data in a machine-readable format, e.g. .CVS, XML, provided that it is not prevented by any legal or other significant obstacles. Please note that this right does not apply to derived personal data or personal data stored by the company on the basis of titles other than the performance of the contract and the consent of the data subject.

#### The right to object to the processing of personal data

You have the right to object to the processing of personal data processed for the purposes of the legitimate interests of the Insurance Company, including profiling. Despite the objection, the company may process these personal data if it has serious legitimate reasons for their processing or the processing is intended to create, exercise or defend legal claims. You have the right to object to the processing of personal data for direct marketing purposes, including profiling. If you object, we will stop processing your personal data for this purpose.

#### • The right not to be subject to automated decision-making

You have the right not to be subject to any decision based solely on automated processing, including profiling, where such a decision would have legal effects for you or significantly affect you.

This right shall not apply if the decision:

- is necessary to conclude or perform a contract between you and the company,
- is authorised by EU or Member State law,
- is based on your explicit consent.

In the event of a decision based on fully automated processing, including profiling, you have the right to request human intervention by the Insurance Company and challenge the issued decision. If special categories of personal data are used to make a decision, your consent to this processing is required.

To exercise your rights, you can use our contact centre at + 420 255 790 111, send us an email to <u>poverec@slavia-pojistovna.cz</u> or contact us in writing at Slavia pojišťovna a.s., Personal Data Protection Department, Táborská 31, 140 00 Prague 4. You can also visit us in person at any of our branches, a list of which is available at <u>https://www.slavia-pojistovna.cz/cs/pobocky/</u>. We recommend using the form available online at <u>www.slavia-pojistovna.cz/ochrana-osobnich-udaju</u>.

#### If you decide not to use our forms, **your application must include**:

- First name and surname, date of birth, address of residence so that we can identify you
- Telephone number and email address
- Specification of the subject of the application
- Date and your signature

Upon request, the company will provide you with information on the measures taken, without undue delay, no later than one month after receiving the request. This deadline may be extended by up to two months, taking into account the complexity and number of applications. We will inform you in the event of such an extension within one month of receipt of the request, including the necessary reasons for the delay.

Please note that the company provides the requested information in electronic form unless you request otherwise.

The right to file a complaint with the Office for Personal Data Protection

You can contact the supervisory authority with your complaint regarding the processing of personal data at any time: the Office for Personal Data Protection, located at Pplk. Sochora 27, 170 00 Prague 7, phone: + 420 234 665 111, website: <u>www.uoou.cz</u>.

## 12. Access to personal data

Your personal data may be accessed by the controller, its employees and contractual processors with whom we have a contract for the processing of personal data, the subject of which is a set of rules for the protection of personal data, including the obligation of confidentiality, for example, external companies managing our information systems or insurance brokers.

This version of the Principles for the Processing of Personal Data at Slavia pojišťovna a.s. is effective from 1 January 2023.

Slavia pojišťovna a.s.

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