Union poisťovňa, a. s.
Karadžičova 10
813 60 Bratislava
Company ID No.: 31322051
Tax ID No.: 2020800353

Company registered in the
Commercial Register of the
Bratislava III Municipal Court,
Section Sa, File No. 383/B.

Basic Information on Personal Data Protection for Data Subjects

Intended for prospective clients, clients (insured persons and policyholders), persons entitled to receive insurance benefits, and persons who have suffered loss or damage as a result of an insured event

1. Protecting your data is very important to us

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

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

The controller is Union poisťovňa, a. s., Karadžičova 10, 813 60 Bratislava, Slovak Republic, Company ID No.: 31322051, registered in the Commercial Register of the Bratislava III Municipal Court, Section Sa, File No. 383/B (referred to in this text as "we" or "our company").

3. Data Protection Officer

Our Data Protection Officer is the Senior Director of the Legal and Support Activities organisational unit. You may contact the Data Protection Officer at Union poisťovňa, a. s., Karadžičova 10, 813 60 Bratislava or by email at: dataprotection@union.sk.

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

This information applies to you if you are a data subject whose personal data are processed because you are our prospective client, client (insured person or policyholder), a representative of a client, a person entitled to receive insurance benefits in the event of the death of an insured person, an heir of a client, a person who has suffered loss or damage as a result of an insured event, or another natural person whose personal data must be processed in connection with the conduct of insurance business.

5. For what purposes do we process your personal data?

We process your personal data only to the extent necessary to fulfil the relevant processing purpose connected with our company's activities, on the basis of generally binding legislation, performance of a contract, your consent or a legitimate interest. An overview of all purposes, categories of personal data and legal bases for the processing of your personal data is provided in the table below.

Purposes of personal data processing *for which your consent is not required*, and the categories of personal data we process about you	**Legal basis for the processing of personal data and the personal data retention period *where your consent is not required***
Purpose of processing: Conducting insurance and reinsurance business. The conduct of insurance business includes, for example, fulfilling our obligations in pre-contractual relationships, concluding insurance contracts, administering insurance contracts, settling insurance claims, providing assistance services, documenting our activities and performing tasks pursuant to Act No. 39/2015 Coll. on Insurance and on Amendments to Certain Acts, as amended (hereinafter also referred to as the "Insurance Act"), and pursuant to Act No. 381/2001 Coll. on Compulsory Contractual Insurance of Liability for Damage Caused by the	***Legal basis:*** - performance of a contract (Article 6(1)(b) of the Regulation), - compliance with our legal obligation (Article 6(1)(c) of the Regulation). ***Retention period:*** For the duration of the insurance contract and for 10 years following termination of the contractual relationship. If we assert a right arising from an insurance contract, or a right is asserted against us, we may retain personal data for a longer period, namely until the expiry of the applicable limitation period.

Operation of a Motor Vehicle and on Amendments to Certain Acts, as amended. ***Category of personal data:*** Personal data processed in the conduct of insurance and reinsurance business[1] (see the footnote below). Other personal data relating to the use of electronic services (e.g. data relating to electronic access and activities carried out through the client and/or partner portal, such as an IP address).	If your personal data relate to an insured event, we process them for 10 years after the insurance claim file has been closed. We process the personal data of our prospective clients for one year if the sales process on the website is not completed, and for two years if the sales process on the website is completed but the prospective client does not pay the insurance premium.
Purpose of processing: Compliance with our legal obligations under generally binding legislation, e.g. accounting, records management, providing cooperation to public authorities, preventing and detecting money laundering, combating terrorist financing and implementing international sanctions. ***Categories of personal data:*** a) ordinary personal data (personal identification number, first name and surname, date of birth, address of residence, sex, email address, telephone number, insurance data, including financial transactions), b) special categories of personal data (health data), c) other personal data specified in particular legislation.	***Legal basis:*** Compliance with our legal obligation (Article 6(1)(c) of the Regulation). ***Retention period:*** For the period required under the relevant legislation; in the case of accounting records, for 10 years from the date on which the accounting document is entered in the records; in the case of ordinary correspondence, for 5 years after the file is closed; and in the case of the prevention and detection of money laundering, combating terrorist financing and implementing international sanctions, for 5 years following termination of the contractual relationship with the client or completion of an occasional transaction outside a business relationship, unless the Financial Intelligence Unit specifies a longer period.
Purpose of processing: Handling complaints. ***Categories of personal data:*** a) ordinary personal data (personal identification number, first name and surname, date of birth, address of residence, sex, email address, telephone number, insurance data, including financial transactions), b) special categories of personal data (health data).	***Legal basis:*** - performance of a contract (Article 6(1)(b) of the Regulation), - compliance with our legal obligation (Article 6(1)(c) of the Regulation). ***Retention period:*** 5 years after the file is closed.
Purpose of processing: Prevention and detection of unlawful or fraudulent activity (so-called fraud assessment). ***Categories of personal data:*** a) ordinary personal data (personal identification number, first name and surname, date of birth, address of residence, sex, email address, telephone number, insurance data, including financial transactions);	***Legal basis:*** - 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 preventing and detecting criminal activity or other undesirable unlawful activity. You have the right to object to such processing. ***Retention period:*** 10 years after completion of the investigation.

[1] Entering into an insurance contract is voluntary; however, under the Insurance Act, you are required to provide us with the personal data necessary for this purpose unless they are expressly indicated as optional. The provision of such data is therefore a condition for entering into an insurance contract, and failure to provide them may result in our refusal to conclude the insurance contract. The list of personal data processed without consent, to the extent specified in Section 78 of the Insurance Act, comprises: first name, surname, permanent address, temporary address, personal identification number, date of birth, nationality, type and number of identity document, contact telephone number, fax number, email address, and personal data contained in the identity document. Where additional personal data are processed, such as health data, they are processed only to the extent necessary to assess the risk when entering into the insurance contract and to determine the extent of the obligation to provide insurance benefits.

b) special categories of personal data (e.g. health data).	
Purpose of processing: Asserting our claims and defending our rights. ***Categories of personal data:*** a) ordinary personal data (personal identification number, first name and surname, date of birth, address of residence, sex, email address, telephone number, insurance data, including financial transactions), b) special categories of personal data (e.g. health data, CCTV recordings).	***Legal basis:*** Our legitimate interest (Article 6(1)(f) of the Regulation), with such processing being carried out for the purpose of establishing, asserting and defending our legal claims. You have the right to object to such processing at any time. ***Retention period:*** 10 years after the file is closed or until the expiry of the applicable limitation period.
Purpose of processing: Recording telephone calls to our customer centre (call centre). ***Categories of personal data:*** a) ordinary personal data (personal identification number, first name and surname, date of birth, address of residence, sex, email address, telephone number, insurance data, including financial transactions), b) special categories of personal data (e.g. health data).	***Legal basis:*** Our legitimate interest (Article 6(1)(f) of the Regulation), so that we can improve the services we provide to you and establish and defend our claims. Where a call is recorded, the caller is informed of this in advance at the beginning of the call. You have the right to object to such processing at any time. ***Retention period:*** 5 years from the date on which the recording is made.
Purpose of processing: Direct marketing — informing our existing clients about developments relating to their insurance contracts and about our products and services which they already use or which are related to products or services already provided to them, including profiling. ***Category of personal data:*** Ordinary personal data (first name and surname, title, address of residence, email address, telephone number and insurance data).	***Legal basis***: Our legitimate interest (Article 6(1)(f) of the Regulation), with such processing being carried out in order to inform you, in particular, about new products and offers, including targeted marketing. We process your personal data in this manner for the duration of the insurance contract and for one year after the insurance contract has terminated. You have the right to object to such processing at any time. ***Retention period:*** 5 years from the direct marketing activity or from the date on which an objection is lodged.
Purpose of processing: Satisfaction surveys and participation in the testing of digital services and products. ***Category of personal data:*** Ordinary personal data (first name and surname, title, address of residence, email address and telephone number).	***Legal basis:*** Our legitimate interest (Article 6(1)(f) of the Regulation), so that we can assess the quality of the services provided with a view to improving them and identify our clients' needs. For satisfaction surveys, we process your personal data in this manner for the duration of the insurance contract and for three months after the insurance contract has terminated. For participation in the testing of digital services and products, we process your personal data in this manner for the duration of the insurance contract and, in the case of short-term travel insurance, also for three months after the relevant insurance contract has terminated. You have the right to object to such processing at any time.

	Retention period: 5 years from the date of the survey or from the date on which you are contacted for the purposes of testing, or from the date on which an objection is lodged.
Purposes of personal data processing *for which your consent is required (except for strictly necessary cookies)*	**Legal basis for the processing of personal data and the personal data retention period *where your consent is required***
Purpose of processing: Marketing offers — offering products and sending information about new products, news and information about benefits, discounts, products and services, including identifying preferences and profiling, where legitimate interest is not relied upon as the legal basis. ***Category of personal data:*** Ordinary personal data (first name and surname, title, address of residence, email address, telephone number or other data specified in the consent).	***Legal basis:*** Your consent (Article 6(1)(a) of the Regulation). You may withdraw your consent at any time; withdrawal of consent does not have retroactive effect. ***Retention period:*** For the period specified in your consent or until you withdraw your consent. We subsequently retain your personal data for a further five years after the consent ceases to be valid.
Purpose of processing: Ensuring the security and functionality of web services (strictly necessary cookies without consent). Evaluating the behaviour of website visitors and personalising website content (on the basis of consent). ***Category of personal data:*** Cookies and IP addresses.	Further information about such processing is available on our website at: https://www.union.sk/vyuzivanie-cookies

6. How do we obtain personal data?

We obtain your personal data primarily from you or through intermediaries (in particular financial agents) with whom we have a contractual relationship, especially during the process of concluding an insurance contract and throughout the term of the insurance contract, for example when handling claims arising from an insured event. We may also obtain your personal data from other persons where this is necessary for the performance of our obligations, for example from an injured party, a healthcare provider, the Slovak Insurers' Bureau (in connection with verifying claims history under compulsory motor third-party liability insurance), the police, public authorities and relevant registers. In accordance with the Insurance Act, we may also obtain personal data from other insurance companies for the purposes of protecting clients and preventing insurance fraud.

7. Recipients and categories of recipients of personal data

Your personal data may be disclosed or provided, pursuant to generally binding legislation, to recipients acting as independent controllers and/or joint controllers. For the purposes specified in Section 5 above, we may also engage processors to process your personal data. Such processors are authorised to process personal data on our behalf and in accordance with our instructions. Selected recipients and categories of recipients to whom your personal data may be provided are listed in *Annex 1 – Categories of Personal Data Recipients and Selected Recipients and Processors* to this document.

8. Your rights as a data subject

Where we process your personal data, you have the following rights in relation to us under the Regulation, unless generally binding legislation provides otherwise. Your rights are governed by Articles 12 to 22 of the Regulation:

8.1. the right to obtain confirmation as to whether your personal data are being processed and, where this is the case, the right to obtain access to those personal data pursuant to Article 15 of the Regulation, together with the information set out in this notice;
8.2. the right to have your personal data rectified and completed pursuant to Article 16 of the Regulation;
8.3. the right to erasure (the "right to be forgotten") of your personal data where 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 request that we restrict the processing of your personal data where any of the circumstances specified in Article 18 of the Regulation apply;
8.5. the right to receive the personal data concerning you which you have provided to us and the right to transmit those data to another controller pursuant to Article 20 of the Regulation;
8.6. **the right to object at any time to our processing of your personal data and/or to lodge a complaint. You have the right to object pursuant to Article 21 of the Regulation where we process your personal data on the basis of a legitimate interest, as well as where we process them for direct marketing purposes, including profiling**;
8.7. the right to object to and not be subject to a decision made by us which produces legal effects concerning you or similarly significantly affects you, where such a decision is based solely on automated processing of personal data pursuant to Article 22 of the Regulation. You have the right to request that we review such a decision by means other than automated processing. We are required to comply with such a request and ensure that our employees play the decisive role in reviewing the decision. We will inform you of the method of review and its outcome within 30 days of receiving your request;
8.8. the right to request proof of the identity of the person authorised to collect personal data;
8.9. where your personal data have not been obtained from you, the right to obtain information about the source from which your personal data originate, including, where applicable, information as to whether the data originate from publicly accessible sources.

You may exercise your rights in any of the following ways:
a) in writing at the address of our registered office: Union poisťovňa, a. s., Karadžičova 10, 813 60 Bratislava, Slovak Republic, or in writing by email to dataprotection@union.sk;
b) in person, orally for the record, in which case the record must clearly state who exercised the right, what you are requesting, when the record was drawn up and by whom, and must contain the signature of the person who drew up the record and your signature; you will be provided with a copy of the record;
c) through a processor, who will subsequently forward your request or the record to us for processing;
d) by any technical means made available to you, depending on the method by which you gave your consent.

9. You have the right to lodge a complaint with the supervisory authority, i.e. the Office for Personal Data Protection

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 breach of personal data protection legislation.

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

The processing of your personal data by our company does not involve automated individual decision-making. Our company uses **profiling — automated tools for processing personal data for the purpose of evaluating certain personal aspects relating to you** for the following purposes/sub-purposes:

10.1. profiling related to the conduct of insurance and reinsurance business for the purposes of analysing insurance risk when underwriting risks and assessing claims history in pre-contractual relationships and contractual relationships;

10.2. profiling related to marketing communications in the form of targeted marketing offers;

10.3. profiling related to the prevention of insurance fraud for the purposes of preventing money laundering, combating terrorist financing and implementing international sanctions.

Profiling may result, for example, in a refusal to conclude an insurance contract (as part of risk underwriting or fraud prevention), claims history being taken into account when determining the terms and conditions of your insurance, including the amount of the insurance premium, or a targeted marketing offer being sent or not sent to you.

11. Personal data will not be made public.

12. Transfers of personal data

Our company primarily transfers your personal data to recipients in European Union Member States, countries that are parties to the Agreement on the European Economic Area, and Switzerland. We will transfer your personal data to third countries only where the European Commission has decided that such countries ensure an adequate level of protection or, in the absence of such a decision, only where the controller or processor has provided appropriate safeguards and you have enforceable rights and effective legal remedies available to you, or where additional safeguards have been adopted in relation to the transfer of your personal data.

For certain marketing communications and data backup purposes, our company also uses major service providers Google, Facebook and Microsoft, specifically Google LLC, Meta Platforms, Inc. and Microsoft Corporation. These providers are based in the United States, and personal data are transferred to these entities on the basis of the European Commission adequacy decision adopted on 10 July 2023 concerning the EU–US Data Privacy Framework pursuant to Article 45 of the Regulation. US providers participating in this framework, to which personal data may be transferred securely from the EU without the need to introduce additional personal data protection safeguards, can be searched for at: https://www.dataprivacyframework.gov/s/participant-search The relevant providers' privacy policies are also available there.

13. 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 (including Annex 1) on an ongoing basis. The current version of this information is always available on the website www.union.sk in the Personal Data Protection section.

Annex 1 — Categories of Personal Data Recipients and Selected Recipients and Processors

Your personal data may be provided in particular to:

- our parent company Achmea B.V., the Netherlands, Company ID No.: 33235189,
- financial agents in the insurance or reinsurance sector,
- reinsurance companies,
- medical assessors,
- assistance companies,
- in the event of an insured event, companies with which we cooperate in settling insurance claims,
- companies acting for and on behalf of our company in connection with the enforcement of rights against the policyholder arising from the insurance contract,
- companies providing services connected with correspondence between our company and data subjects,
- companies providing information technology services,
- the company providing document digitisation services for our company,
- the company providing archive and records management services,
- the company evaluating satisfaction surveys concerning our services,
- our external auditor,
- public authorities in accordance with applicable legislation.

If you have concluded a travel insurance contract, insurance covering the costs of intervention by the Mountain Rescue Service, or an insurance contract covering property and personal liability, the personal data specified in the insurance contract may also be provided to:

- Eurocross Assistance Czech Republic, s.r.o., Company ID No.: 25598180, which provides assistance services.

If you have concluded an insurance contract covering a motor vehicle or trailer, or a compulsory motor third-party liability insurance contract, the personal data specified in the insurance contract may also be provided to:

- the Slovak Insurers' Bureau, Company ID No.: 36062235, in accordance with Section 11(3) of Act No. 381/2001 Coll.,
- Eurocross Assistance Czech Republic, s.r.o., Company ID No.: 25598180, which provides assistance services,
- vehicle repair shops carrying out repairs to damaged vehicles.

If you have concluded an oncology insurance contract or a Moje zdravie insurance contract, the personal data specified in the insurance contract may also be provided , on the basis of your explicit consent, to:

- MediGuide International, LLC, 4550 Linden Hill Road, Ste 103, Wilmington, DE 19808, United States of America, which arranges verification of the diagnosis and assessment of the proposed treatment,
- MediGuide International's local partner, which facilitates communication between the insured person, MediGuide International and the foreign clinic selected by the insured person from the available options to carry out verification of the diagnosis and proposed treatment,
- the specialised clinic selected by the insured person from the available options, which carries out verification of the diagnosis and proposed treatment.

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