

Personal Data Protection Policy

This Personal Data Protection Policy is binding for any processing of personal data of users of erapo website accessible at www.erapo.sk who are data subjects within the meaning of the provisions of 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 (General Data Protection Regulation) (hereinafter referred to as “Regulation”).

Website Operator processes personal data of a User from the moment of submission of the form needed for the creation of insurance contract proposal and/or from the moment of supplementation of data by Website User when reporting an insured event.

In terms of personal data protection, User is data subject whose personal data are processed in the Operator’s informational systems.

Operator processes the User’s personal data within the scope and in the manner compliant with the Regulation and good manners and only for the defined purposes.

Operator processes personal data of User (data subject) on various legal bases. From the point of view of the Regulation, the Operator is controller, processor or another processor (subcontractor), based on the respective purpose of personal data processing.

Operator processes personal data of User for the period necessary to perform the defined purpose of personal data processing only.

All data provided by User to the Website Operator shall be saved on a secure server. Operator shall ensure the protection of data and personal data of Website Users by exercising procedures pursuant to the security documentation of Operator or that of persons for whom the Operator processes the personal data.

Operator processes personal data for the following purposes:

- a) Conclusion of insurance contracts**
- b) Operator’s marketing communication**
- c) and d) Financial intermediation and performance of statutory duties pursuant to Act No. 186/2009 Coll.**
- e) Advertising and marketing activities for the benefit of third parties**

Ad a) Personal data needed in order to enter into an insurance contract are processed by the Operator for Umbrella Group, s.r.o., company ID: 44 068 000, which is the processor for the operator of the personal data information system, in which these data are processed: Union poisťovňa, a. s., Karadžičova 10, 813 60 Bratislava, Slovak Republic, company ID: 31 322 051, registered in the Commercial

Register maintained by the Bratislava I District Court, Section Sa, File No. 383/B, which is the entity requested by the User to enter into contract with him/her, and for the purposes of entering into this contract.

Operator processes the following personal data in particular:

Name, surname, permanent residence, temporary residence, personal identification number, date of birth, nationality, type and number of identification document, telephone number, fax number, e-mail address and personal data from the identification document.

Legal basis for processing: contract, Regulation and Act No. 39/2015 Coll. and Act No. 186/2009 Coll.

Provision of personal data is needed for the conclusion of contract on financial service and for the provision of the financial intermediation service. If User does not provide his/her personal data, Operator must not provide the financial intermediation service.

Unless specified otherwise by a special regulation, personal data are processed for at least the period of the financial service contract.

Ad b) erapo's marketing

Operator processes personal data of Website users for the purposes of sending information on news and new Website products and services and for marketing activities related to Website products and services. Operator processes personal data of persons who enter into insurance contract through the Website as well as those who do not enter into contract; information on products and services offered by Operator is specified on the Website. Operator's services include:

- Intermediation of job offers in Slovakia and abroad;
- Intermediation of cross-border mobilities, internships, study trips and/or further study possibilities;
- Education, training and intermediation of education and training;
- Intermediation of accommodation in Slovakia or abroad;
- Assistance and consultancy in the area of mobility, accommodation, teaching.

Operator processes the following personal data in particular:

Name, surname, permanent residence, temporary residence, date of birth, nationality, telephone number, e-mail address.

Period of processing: for the duration of Operator's activity.

Legal basis of processing: the Regulation (legitimate interest of Operator pursuant to Art. 6(1)(f) of the Regulation, on the basis of assessment of potential expectation of User that processing for the purpose specified in this paragraph will be performed). Operator's legitimate interest in processing of User's personal data is the utilization of possibility to offer services to the User, which are by their content, character and focus close to services provided to the User when intermediating a conclusion of insurance contracts for Erasmus+ mobility participants. All specified services are related to stays of natural persons outside of the territory of Slovakia in order to carry out professional and study activities.

Ad c) Personal data needed for the purpose of performance of activities of a financial agent pursuant to Act No. 186/2009 Coll.

Operator processes the following personal data in particular:

Name, surname, permanent residence, temporary residence, personal identification number, date of birth, nationality, type and number of identification document, telephone number, fax number, e-mail address and personal data from the identification document.

Period of processing: within the statutory period pursuant to Act No. 186/2009 Coll. (at least 10 years from the validity of the financial service intermediation contract).

Legal basis of processing: the Regulation and a special law (Act No. 186/2009 Coll.)

Provision of personal data is needed for the conclusion of contract on financial service and for the provision of the financial intermediation service. If User does not provide his/her personal data, Operator must not provide the financial intermediation service.

Ad d) Personal data needed for the purpose of performance of activities of a subordinate financial agent pursuant to Act No. 186/2009 Coll.

Operator processes the following personal data in particular:

Name, surname, permanent residence, temporary residence, personal identification number, date of birth, nationality, type and number of identification document, telephone number, fax number, e-mail address and personal data from the identification document.

Period of processing: within the statutory period pursuant to Act No. 186/2009 Coll. (at least 10 years from the validity of the financial service contract).

Personal data processed on the basis of this letter are processed by Operator, as a processor within the meaning of definition in the Regulation, for Umbrella Group, s.r.o., company ID: 44 068 000 which is – according to Act No. 186/2009 Coll. – an

independent financial agent and performs their activities through Operator as a subordinate financial agent.

Legal basis of processing is the Regulation and a special law (Act No. 186/2009 Coll.)

Provision of personal data is needed for the conclusion of contract on financial service and for the provision of the financial intermediation service. If User does not provide his/her personal data, Operator must not provide the financial intermediation service.

Ad e)

Personal data processed on the basis of User's consent for purposes of advertising and marketing communication on goods and services of third parties are processed by Operator as the processor within the meaning of the definition in the Regulation.

List of personal data processed: name, surname, permanent residence, temporary residence, date of birth, nationality, telephone number, e-mail address.

Period of processing: for the duration of Operator's activity.

Legal basis of processing: consent of data subject.

Personal data are provided by Operator's contractual partner. Operator ensures the security of personal data provided to third parties contractually (with third parties).

Withdrawal of consent:

User is entitled to withdraw his/her consent at any time. Such a withdrawal, however, shall not affect the lawfulness of processing based on the consent before its withdrawal.

In order to process personal data, Operator uses intermediaries that carry out various services for Operator (accounting services, analytical registering, IT services, etc.). Intermediaries perform their activities on the basis of intermediary contracts, in compliance with the requirements set out in Article 28 of the Regulation. Persons in intermediaries may be recipients of personal data.

TECHNICAL PERFORMANCE OF SERVICE

To administer their systems that host the personal data, Operator utilizes services of:

ZAYOmedia.com s.r.o., Pečnianska 31, 851 01 Bratislava, company ID: 46 029 095, which is only a provider of technical services, without any possibility to process personal data and without any access to them.

Operator uses hosting services of:

Webglobe – Yegon, s.r.o., Stará Prievozská 2, 821 09 Bratislava, **company ID: 36306444**; this service hosts the Company's webmail as well.

Webmail is used as a tool for processing personal data of users. Operator uses the alias @erapo.sk.

Disregarding the legal basis, purpose and scope of processed personal data:

Operator processes personal data which are correct, complete and updated as necessary with regard to the purpose of processing.

Operator is obliged to intercept any incorrect and incomplete personal data and to correct or complete them without any undue delay; incorrect and incomplete personal data that cannot be corrected or completed so that they are correct and complete shall be clearly marked by Operator and discarded without any undue delay.

INFORMATION FOR USERS

Any User is entitled to be fully informed about any processing of personal data related to him/her. Information are described in descriptions of individual processing (point (a) to (e)). Furthermore, User has the following rights as a data subject:

- Right to request from the controller access to personal data related to him/her in the following manner:

- a) Request confirmation as to whether or not personal data concerning him or her are being processed
- b) Request information on personal data processing in an information system and on procedure of processing and evaluation of operations
- c) Request exact information on source, from which the Operator obtained personal data for processing
- d) Request a list of personal data subject to processing

Operator shall provide User with one copy of the User's personal data being processed.

For any further copies requested by User, Operator may charge a reasonable fee corresponding to the respective administration costs. If User submits his/her request electronically, information shall be provided in a commonly used electronic form, unless requested by the User otherwise.

- Right to have personal data rectified

Without any undue delay, Operator shall rectify (when requested to do so by User) any personal data related to the User and/or completes such personal data on the basis of additional statement by the User.

- Right to have personal data deleted

Operator shall delete the User's personal data without any undue delay when any of the conditions below is met:

- Personal data are no longer needed for the purposes for which they have been collected or otherwise processed;
- User withdraws his/her consent, on the basis of which the processing has been taking place, unless there is any other legal basis for processing;
- User objects the processing on the basis of legitimate interest of Operator, there is no other legal basis for processing; or if User objects to processing on the basis of legitimate interest of Operator for direct marketing purposes;
- Personal data have been processed in violation of law;
- Personal data must be deleted in order to comply with statutory duty resulting from EU legislation or the legislation of the Member State applicable to Operator; Operator shall not delete data when it is possible, expedient and necessary to proceed pursuant to Article 17(3) of the Regulation only.

- Right to restriction of processing

User has the right to request that Operator restricts processing in any of the following cases:

- User has objected to correctness of personal data during a period that allows Operator to verify the correctness of personal data;
- Processing is illegal and User objects to deletion of personal data, requesting restriction of their use instead;
- Operator no longer needs personal data for the purposes of processing, but they are still needed in order to demonstrate, exercise or defend legal claims;
- User has objected to the processing pursuant to Art. 21(1) of the Regulation, pending the verification whether the legitimate grounds of Operator override those of User;
- User who has achieved a restriction in processing shall be notified by Operator before any processing restriction is cancelled.

- Right to object to processing

User has the right to object to personal data processing at any time when the processing is carried out on the basis of a legitimate interest of the Operator:

- Unless there is no other legal basis for processing that overrides legitimate interests of User, Operator shall no longer process personal data (unless their processing is no longer needed to demonstrate, exercise or defend legal interests of the Operator);

- If personal data are processed for purposes of direct marketing, User may object to personal data processing related to him/her at any time for such marketing purposes, including profiling, to the extent it is related to direct marketing.
- If User objects to processing for direct marketing purposes, his/her personal data may not be processed for such purposes any more.

- Right to data portability

User has the right to obtain personal data related to him/her and provided by him/her to Operator, in a structured, commonly used and machine-readable format; User has the right to transmit those data to another controller without hindrance from Operator to which the personal data have been provided, where the processing is based on a consent or contract.

AUTOMATED DECISION-MAKING, INCLUDING PROFILING

Operator performs no automated decision-making, including profiling. Operator does not intend to transfer personal data to third countries.

COMPLAINTS

In connection to the protection of his/her rights pursuant to the Regulation, User may lodge a complaint with the Office for Personal Data Protection.

EXERCISING OF USER'S RIGHTS

User is entitled to exercise his/her rights in respect of Operator by any method allowing to record the exercise of his/her right so that the User's rights may be duly fulfilled.

Operator shall inform User about the proceedings in rights-related requests without any undue delay, in any case no later than within one month after the respective request is delivered. Unless User requests to be notified otherwise and such other method is technically feasible and allows for recording of the content of the information provided, Operator shall inform User in writing.

Operator does not intend to transfer personal data to a third country or international organization.

When the purpose of processing ceases to exist, Operator shall process personal data only if it is necessary for archiving purposes or for other purposes set out by a special legislation or allowed by the Regulation.

In case of any communication need in relation to personal data protection (questions, submissions, requests and objections, any need to exercise rights), please contact us at info@erapo.sk or (in writing) to at our address: Erapo s.r.o., Štúrova 19/3, Bratislava 811 02.

In: Bratislava, Date: 17 September 2019

Erapo s.r.o.