

INFORMATION ON DATA PROCESSING

GENERAL INFORMATION

UNIQA osiguranje d.d. (hereinafter: Company), having its registered office in Zagreb, Planinska 13 A, Zagreb, NIN: 75665455333, LEI: 74780000P058T15YPX93, registered in the court register of the Commercial Court in Zagreb under the identification number of the subject of entry 080297140, further to the ruling of the Croatian Financial Services Supervisory Agency, is authorised to perform the activities of life and non-life insurance. In the performance of its registered activity, the Company processes personal data in conformity with all relevant laws and regulations. The Company is part of the UNIQA Insurance Group AG with headquarters in Vienna, Donaustraße 21, Austria. More information available at the link: <https://www.uniqa.com>.

Contact:

Telephone: 01 6324 200

Electronic mail: info@uniqa.hr

Web: <http://www.uniqa.hr>

DATA PROTECTION OFFICER

Further to the relevant regulations, the company has appointed the Data Protection Officer, whom you may contact should you have any questions regarding the processing of your personal data and your rights relating to the protection of personal data.

Contact

Telephone: 01 6324 200

Electronic mail: dpo@uniqa.hr

LEGAL GROUNDS AND PURPOSES OF COLLECTING PERSONAL DATA

The company determines the purposes and means of the processing of personal data and, in that sense, it is regarded as the controller of the processing of personal data.

Legal grounds for the processing of data may be divided into the following groups:

• Taking actions at your request before the insurance contract is concluded

It is your duty under Insurance Law at the time the insurance contract is concluded to inform the company about any and all circumstances relevant for risk assessment that you know or that could not remain unknown to you. The conclusion of the insurance contract includes the processing of your data, so that we might:

- make an assessment whether the risk we are about to assume is acceptable for insurance, and under what conditions, and determine the amount of your insurance premium taking into consideration all relevant circumstances;
- process your offer, and draw up and provide you with your insurance policy;
- prepare an informative calculation;
- determine/analyze target market affiliation

• Performance of the insurance contract

Performance of the insurance contract requires the processing of your data in order to realize the rights and obligations of the parties arising from this contract, which includes:

- an assessment whether the insurance contract, and under what conditions, may be amended;
- resolving the claim for damages;

- making a decision on the existence of the right to payment of the insured amount;
- administration of the insurance contract and accompanying insurance documentation;
- fulfilling your rights from the insurance contract, including collection of the insurance premium and recourse claims and accompanying tasks of accounting and business reporting;
- approval and collection of loans under life insurance policies
- sending notices about the due date of the insurance premium, notices about the attributed profit, the state of the fund reserve, notices about the expiry of the insurance, changes to the insurance contract
- ensuring that your data is accurate and up to date.

• Performance of our legal obligations

Your data shall be processed, so that we might perform our legal obligations, including, but not limited to:

- determining your needs and requirements before the conclusion of the insurance contract and, in the case of investment insurance products, verifying the appropriateness or suitability of the product for your specific circumstances;
- risk distribution via re-insurance or co-insurance to protect the interests of our clients and to perform the obligations assumed;
- resolving complaints and out-of-court dispute resolution;
- obligations set out in the Act on the Prevention of Money Laundering and Financing of Terrorism;
- obligations set out in tax regulations, such as the Accounting Act, FATCA and CRS to ensure compulsory automated exchange of information on financial accounts, etc.;
- performing obligations set out with the aim of implementing the supervisory powers of Croatian and European supervisory bodies from within the competence of state authorities (Ministry of the Interior, competent state attorney's office, Tax Administration, etc.) and activities from within the competence of the Croatian Insurance Office;
- legally prescribed obligations for conducting audits.

• Legitimate interests

The processing of your data on the basis of the legitimate interests of the Company is subject to special rules that enable you to submit an objection at any time, on the basis of your specific situation, to such processing and to the creation of a profile based on such processing. In that case, we shall no longer process your data on the basis of our legitimate interests, unless we prove that there are legitimate grounds for processing that prevail over your interests, rights and freedoms. If there are special rules with respect to your right to an objection, we shall specify them separately.

On the basis of its legitimate interests, the company shall process your data for the following purposes:

- preventing and detecting insurance fraud and fraud and embezzlement in general;
- submitting, realising or defending legal claims, regardless whether in court or administrative proceedings or any out-of-court proceedings;
- direct marketing that involves profiling and includes the promotion of products that the company offers on the market aimed at the contractual party during the contractual relationship;

In this case, if you object, we shall no longer process your data for this purpose.

- surveying your satisfaction with the service rendered;
- segmentation of clients, which involves profiling with the aim of granting additional benefits to clients that do not affect the conclusion or performance of the insurance contract;
- conducting video surveillance of our business facilities for the purpose of protecting people and property;
- recording of telephone conversations for the purpose of gathering evidence on resolving inquiries and contracting services, protection of persons and property, and education of the Company's employees;
- notifications about debt or subscription or other important facts from the insurance contract (including contacting via e-mail or mobile phone);
- contacting in order to provide customer support;

• Legitimate interests of third parties

The processing of your data shall be conducted for the purpose of preventing insurance fraud and fraud and embezzlement in general, on the basis of the legitimate interests of other insurance companies and business partners with which we exchange data for this purpose.

• Your consent

In some cases, the Company may ask you for special consent for the processing of your data for the purpose indicated on the individual consent. If data processing is based on your consent, you have the right to withdraw it at any time. Withdrawal of the consent shall not affect the lawfulness of the processing that was based on your consent before it was withdrawn.

The provision of personal data on the basis of the legal grounds for the taking of actions upon your request before the conclusion of the insurance contract, performance of the insurance contract, performance of our legal obligations, the legitimate interest of preventing and detecting fraud (including the legitimate interest of third parties) is a legal and contractual obligation and a condition required for the conclusion or performance of the contract. If you refuse to provide certain data, we shall not be able to perform our legal or contractual obligations, which will result in the inability to conclude or perform an obligation under the contract.

The provision of personal data on the basis of the legal grounds of the legitimate interest of direct marketing, surveying of your satisfaction, segmentation of clients, and your consent in terms of marketing is not a legal or contractual obligation and a condition required for the conclusion or performance of the contract. If your refuse to provide certain data, this shall not affect the possibility of concluding or performing the contract.

TYPES OF PERSONAL DATA THAT WE PROCESS AND THE METHOD OF COLLECTING THEM

Personal data that we collect depend on the purpose of processing and the type of the insurance contract that you conclude or intend to conclude, or on the request for the realization of rights arising from insurance, which includes:

- basic personal data (i.e. name and surname, address of permanent/temporary residence, contact information, NIN, MBO (registration number of the insured person), date of birth, sex, copy of identification document if necessary, citizenship);
- personal data required for risk assessment (education and working experience, working place and data connected with the working place, data on absence from working place, health data (including health findings), financial data, data on social status and lifestyle, data on receipts and earnings, data on planned travel and travel expenses, data connected with the family);
- data on the subject-matter of insurance (identification number, characteristics, location, photos, data from the loan agreement, ownership, etc.);
- data on the harmful event (circumstances concerning its appearance as the result of an event caused by risk covered by insurance, data (including photos) from records, findings, opinions

and similar documentation related to the harmful event) or compensation claim (including bank account data, data on the insurance amount, data from the inheritance decision, pension decision, loan amount, tax decision etc.);

- data required for taking actions in conformity with our legal obligations (in-depth analysis of the party, accounting, tax reporting, etc.);
- data necessary to prevent insurance fraud
- special categories of personal data (health data necessary for risk assessment and affecting the conclusion of contracts or necessary for the performance of obligations and exercising rights from insurance contracts, data on membership in trade unions, data on the degree of disability and other sensitive data that are processed in order to obtain certain benefits when concluding an insurance contract)
- data for insurance contract administration, payment, collection, loan approval (including financial data and related data such as a copy of a bank account card without a visible control code)
- data related to the segmentation and profiling of the Company's clients
- data related to inquiries, complaints, objections, customer support requests
- data processed when browsing the Company's pages (e.g. cookies), more information about which can be found on the Company's website under the heading "Terms of Use"

Certain data are necessary for the conclusion or fulfillment of the contract, that is, they are necessary for the fulfillment of the Company's legal obligations, and without them it is not possible to contract and provide insurance services.

We collect personal data via defined functionalities of our information system in the way that is described in the processes of the company and via business documentation (forms, applications, etc.). Depending on the type of processing and the type of the insurance contract, the process of collection may be conducted as follows:

- directly from you or your attorneys, such as lawyers or insurance brokers;
- review of your identification documents or your documentation, and the documents or documentation of the insurance file;
- making a copy of your identification documents or your documentation, and the documents or documentation of the insurance file when it is prescribed by law or our internal rules.

We primarily collect personal data directly from you, during negotiations on the contract conclusion, the conclusion of the contract or contract execution via forms, telephone, or electronic communication. We may obtain data about you directly from publicly available sources, from third parties, such as injured parties, our business partners, your employer, insurance distributors, state authorities, other insurance companies and associations, appraisers, lawyers or financial institutions.

TO WHOM YOUR PERSONAL DATA WILL BE REVEALED

Your data will be processed exclusively for the purposes stated in this document. In order for such purposes to be achieved, your data will be revealed to the following categories of recipients on a need to know basis:

- bodies of state and public authorities (e.g. HANFA, Ombudsperson for Insurance, Tax Administration, Ministry of Finance of the Republic of Croatia, Croatian Insurance Office, judicial authorities),
- UNIQA Insurance Group AG,
- Croatian Insurance Office (HUO),
- Center for Vehicles of Croatia (CVH),
- intermediaries in insurance and re-insurance,
- companies for insurance and re-insurance,
- companies for the collection of claims and financial institutions,
- medical institutions and doctors,
- experts (lawyers, detectives, medical experts, appraisers, marketing and other experts),

- providers of information, print and delivery services,
- providers of the services of verification of sanction lists and lists of politically exposed persons,
- providers of the services of processing of claims for reimbursement and assistance (if agreed),
- recourse debtors (e.g. insured persons, damage victims, damage insurers) in cases of exercise of recourse rights,
- to other business partners (e.g. strategic alliances for the prevention of insurance fraud, leasing companies) and auditing companies.

The transfer of your personal data to recipients shall be conducted following appropriate confidentiality protection measures, and data recipients who are also data processors on behalf of the Company, shall process data exclusively in accordance with our instructions and with the agreement concluded with them.

In certain cases, the Company, together with another data controller, determines the purposes and methods of data processing, such as the case when the Company together with another insurance company co-insures risks from a certain type of insurance and jointly processes your data when fulfilling contractual obligations. As a data subject, you can exercise your rights against each of the joint data controllers individually.

WHERE YOUR PERSONAL DATA WILL BE PROCESSED

We shall process your data within the European Economic Area. If it is necessary to transfer your personal data outside this area, such transfer shall proceed only if the European Commission confirms that the third country fulfils a certain level of data protection or if there are adequate protection measures in accordance with the applicable law (e.g., compulsory corporate rules, standard contractual clauses).

HOW LONG WE KEEP YOUR PERSONAL DATA

The Company shall keep data in a form that enables your identification within the deadlines set out on the basis of the purpose of processing, regulations defining the periods for keeping such data as well as the statute of limitation of claims under particular types of agreements or in cases of indemnification for damage. Data is stored as long as necessary to fulfill the purpose for which it is processed. The Company regulates the retention periods of personal data in more detail in its own internal acts.

SECURITY OF DATA PROCESSING

The Company implements technical and organizational protection measures to ensure an appropriate level of security for the processing of your data.

RIGHTS YOU HAVE IN RELATION TO YOUR PERSONAL DATA

In the prescribed cases in relation to your data, you may realize the following rights:

- the right to information whether your data are processed and, if so, access to the data and information being processed, you have the right to access data and information about the processing, in particular about their purpose of processing, about the type/categories of personal data, about the recipients or categories of recipients and about the expected period in which the personal data will be stored;
- the right to have your data deleted (where applicable) that is, if your personal data are no longer necessary in relation to the purposes for which the Company collected or processed them;
- the right to a corrigendum and completion of data if your data is not accurate, complete and up-to-date;
- the right to the prescribed processing if, e.g., you deny the accuracy of data or the legal grounds for processing until the data are corrected or the legal grounds for processing established;
- the right to an objection in the case of processing conducted further to our legitimate interests and the legitimate interests of third parties or on the basis of public interest;
- the right to the transferability of data (where applicable) that is, you have the right to receive your personal data in a structured

form and in a commonly used and machine-readable format, so that they can transfer the data to another controller, but only in the case when the Company carries out the processing on the basis of consent or contract, i.e. if the processing is carried out by automated means;

- the right that a decision based exclusively on automated processing does not relate to you, including the creation of the profile, if it has legal effects which relate to you or which affect you significantly in a similar way (where applicable).

Your rights may be realized by sending a written request to the following e-mail: info@uniqa.hr or to the address of the company at Planinska 13 A, Zagreb, or by submitting a request at any branch office of UNIQA osiguranje d.d.

You can exercise your rights by sending a request in writing to dpo@uniqa.hr, by filling out an online form on the Company's website www.uniqa.hr available in the "Personal Data Protection" section, or to the Company's address at Planinska 13 A, Zagreb, or by submitting a request in any branch of the Company.

In accordance with the applicable regulations, the Company will respond to your request without undue delay and in any case within one month of receiving the request. If necessary, this deadline can be extended by an additional two months if it is a complex request, and you will be informed about this in a timely manner.

When submitting a complaint, it is possible that the Company will ask you for additional reasonable information for security verification of identity before your request is granted.

RIGHT TO SUBMIT AN OBJECTION TO THE SUPERVISORY AUTHORITY

You may submit an objection to the processing of your personal data at any time if you hold that during such processing we violated Croatian or European regulations on the protection of data to the competent supervisory bodies, Croatian Data Protection Agency as the competent supervisory body for the protection of personal data, www.azop.hr, i.e., in the case of a change of valid regulations to some other authority that will take over its competence in the field of supervision body within the EU.

AUTOMATED DATA PROCESSING AND PROFILING

Your personal data shall be the subject matter of profiling in the following cases:

- direct marketing
- marketing
- segmentation of clients.

Automated processing and profiling that has legal effects with the aim of concluding an insurance contract shall be used in the following cases:

- establishing the appropriateness or suitability of insurance investment products

In conformity with your investment goals, willingness to assume risks and the ability to bear risks, financial situation, and knowledge and experience in the field to which the investment relates, we shall examine which of our investment insurance products is appropriate or suitable just for you, with the aim of determining whether you belong to the target market.

- calculation of the insurance premium in view of previous damages

If you had damages in the previous insurance period and the conditions of insurance and the applicable price list set out how it affects the premium amount, the premium shall be increased or reduced by the relevant percentage amount.

- calculation of the insurance premium in view of the location of the subject of insurance

On the basis of the entry of the location of the insured property in the application, we estimate the extent of certain risks for the onset of the insurance event and thus determine the insurance premium.

- online purchases

Data entered on the portal of an Internet store and your choices will be automatically processed and will affect the final insurance contract you are concluding. The foregoing may relate to the matter of insurance (e.g., the surface area of the real estate in the case of property insurance, vehicle data for informative calculation of automobile liability insurance premium, age for informative calculation of supplementary/additional health insurance premium) or your selection of the insurer's package (eg, the selection of a package that includes several coverages).

In cases like this, we ensure the right to personal intervention, the right to express one's opinion and the right to dispute the decision.

PRESENECE ON SOCIAL NETWORKS

The Company is present in social networks and processes user data for the purpose of communicating with users who are active there or to inform you about our services. The data is used exclusively for the purpose of responding to your inquiry and is not forwarded to third parties. The Company has no influence on the privacy rules of social networks, and in relation to data processing, the Company and social networks are considered joint controllers.

For more detailed information on the form of processing and objection possibilities, the Company refers to the data protection statements, and information provided by the operators of the respective networks.

Social networks:

Instagram: Social network; service provider: Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; website: <https://www.instagram.com>; privacy policy: <https://instagram.com/about/legal/privacy>.

Facebook: Social network; service provider: Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA, website: <https://www.facebook.com>; privacy policy: <https://www.facebook.com/about/privacy>.

YouTube: Social network and video platform; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA; privacy policy: <https://policies.google.com/privacy>.

LinkedIn: Social Network, Service Provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; website: <https://www.linkedin.com>; privacy policy: <https://www.linkedin.com/legal/privacy-policy>.

UPDATING THE INFORMATION

Information on the processing of data is regularly examined and verified in terms of whether it reflects the way in which the company processes personal data. The current version is always available at our website www.uniqa.hr, and in the case of any more relevant changes that affect your rights and freedoms, we shall notify you directly.

Zagreb, 1.7.2024.