

A. Controller

Generali España, S.A. de Seguros y Reaseguros

Registered Address: Calle Orense 2, 28020 Madrid (Spain)

NIF: A28007268

Registration details at the Commercial Registry: Sheet M-54.202.

Contact details of the Data Protection Officer: delegadoprotecciondatos.es@generali.com.

B. Purposes and grounds

Below we describe the various purposes for which your personal data are processed, and the grounds of such processing:

i. Grounds due to performing an insurance contract executed with GENERALI:

- a. To formalise this policy in order to determine the coverage provided under this insurance contract to the Insured and/or Beneficiary.
- b. To manage, maintain and supervise this contractual relationship, including the collection of premium bills and the processing of amendments, supplements and extensions to this policy.
- c. To make communications related to this policy, in order to provide you with information on the current state of your insurance and the tools that GENERALI has made available to you, as part of its management of your contractual relationship and exclusively to facilitate the exercise of your rights pursuant to this policy.
- d. Carry out any verifications and investigations required to determine and where applicable pay compensation to the insured, the beneficiary or the injured party.
- e. To communicate your personal data, and those of the insured, beneficiary or damaged third party, to reinsurance entities, if this is strictly necessary in order to execute a reinsurance contract in the terms foreseen in Article 77 of Insurance Contract Act 50/1980, or the performance of related transactions, to include the completion of statistic or actuarial studies, risk analysis or investigations for its clients, as well as any other activity related to or derived from the reinsurance business.

ii. Grounds in order to fulfil a legal obligation:

- a. To manage the resolution of any complaints and disputes that may arise between policyholders, insureds, beneficiaries, damaged third parties or assigns of any of the foregoing, with GENERALI, pursuant to Article 97 of Act 20/2015, of 14 July, on the arrangement, supervision and solvency of insurance and reinsurance entities.
- b. To communicate information to public authorities, regulators or governmental bodies if this is necessary by law, pursuant to local regulations or due to mandatory obligations.
- c. To keep the accounting books required by the Spanish Commercial Code and other applicable provisions, as well as records of accounts, claims, technical provisions, investments, reinsurance contracts and policies, supplements and cancellations, pursuant to Article 96 of Royal Decree 1060/2015, of 20 November, on the arrangement, supervision and solvency of insurance and reinsurance entities.
- d. Take effective measures to prevent, deter, identify, detect, report and remedy fraudulent conduct relating to insurance in compliance with section 100 of the Organisation, Supervision and Solvency of Insurers and Reinsurers Act 20/2015 of 14 July.
- e. GENERALI will disclose any claims data relating to your insurance and/or your claim to the Fraud Prevention Information System for Miscellaneous Insurance Lines of Business, including the insurance policy taken out

by you or any claim in which you have been involved, and is the joint controller for the processing by this System. Its purpose is preventing and detecting fraud, either by advising the insurer once the policy has been issued or by detecting fraud in claims already made. Likewise, its purpose will be to cooperate with law enforcement agencies by assisting in the investigation of crimes including theft and fraud related to the insured property.

You may exercise your data protection rights by contacting TIREA, Ctra. Las Rozas a El Escorial Km 0,3 Las Rozas 28231 MADRID.

You can find further information on data protection on the UNESPA (www.unespa.es) and TIREA (www.tirea.es) websites.

iii. Grounds based on GENERALI's legitimate interests:

- a. Conduct marketing and/or advertising actions or communications by any means including electronic or equivalent messages relating to products or services similar to those taken out with GENERALI in compliance with section 21(2) of the Information Society Services and Electronic Commerce Act 34/2002 of 11 July. Communications may be made on the basis of profiling carried out by GENERALI to find out which products and services best suit your profile and thus send you personalised offers.
- b. To conduct satisfaction surveys related to the insurance you have taken out and GENERALI's services, in order to evaluate your satisfaction and thus improve any processes and services related to compliance with GENERALI's obligations by virtue of this policy.
- c. Intragroup disclosure: intragroup exchange of information among insurance companies for compliance with supervisory obligations and for administrative purposes.
- d. To prevent potential fraud derived from contracting this insurance, for which any steps that are reasonably necessary may be carried out in order to detect the existence of potentially fraudulent information, or inaccurate, incorrect or inconsistent data.
- e. To check data files on equity and credit solvency, if it is necessary to appraise the economic solvency of the affected party under applicable regulations in the matter.
- f. Disclosure of your personal data on asset and credit solvency to reports relating to compliance or breach of monetary obligations, specifically to the Asnef / Equifax report.

In order to carry out these processing's, GENERALI has performed a balancing exercise between the data subject's fundamental rights and GENERALI's own legitimate interests and has concluded that these rights are not affected. You may request a copy of the conclusions reached by contacting the Data Protection Officer ("DPO") at the address shown at the end of section "A. Data Controller".

You may at any time exercise your right to object to these processing's by any of the means shown in section "G. Data protection rights".

At the same time, you hereby guarantee the veracity of any personal data provided to GENERALI. Furthermore, GENERALI may periodically request that you check and update any of your personal data it may hold.

C. Data addressees

GENERALI may communicate your personal data to insurers, coinsurers and reinsurers and public administrations, as long as these communications are necessary for the performance of this policy and according to its purposes and grounds, described in "B. Purposes and grounds" above.

Likewise, your personal data may also be disclosed, where applicable, to different categories of recipients, including but not limited to, loss adjusters or other similar professionals, vehicle repair shops, lawyers, barristers and Notary Publics, detectives, claimants, medical centres and hospitals, medical evaluators, rehabilitation managers, collective accident managers, pension fund managers, documentation filing managers, salvage companies, insurance adjusters, rebuilders, cause investigators.

During the term of the contractual relationship with the Company, some of the aforementioned recipients are the parties responsible for the processing.

D. Data categories and sources

GENERALI will only process the data strictly necessary to fulfil the purposes described in section “B. Purposes and grounds” above. This includes, but is not limited to, your identification data, contact data, personal characteristics data, financial information data, information data derived from your insurance application, specially protected data (such as health data where needed), browsing data from the GENERALI website or from third parties with which we have an agreement, and any other data as may be required to fulfil the aforementioned purposes.

Without prejudice to any personal data you and/or your insurance broker may have provided, GENERALI will process the personal data taken from common files, sectoral files, equity and credit solvency files and/or public authorities, doctors or health centres and hospitals that have assisted or examined you, according to the purposes and grounds described in “B. Purposes and grounds” above.

Further to the foregoing, GENERALI will process the personal data provided by the aforementioned third parties, under the following categories:

- i. Identification details
- ii. Mailing or electronic addresses
- iii. Economic details
- iv. Health data

E. International transfers

You are hereby informed that GENERALI may hire service providers located outside the European Economic Area. In these cases, the company will demand that such addressees follow the personal data protection measures established in a binding contract, unless the European Commission has determined that the country where the addressee is located provides an adequate level of personal data protection. Clients may obtain a copy of the measures imposed by GENERALI by contacting the Data Protection Representative (“DPR”) at the address indicated at the end of Clause A.

F. Personal data conservation

GENERALI will keep your data for the term of your contractual relationship with us, and once any obligations arising from this relationship have ceased we will keep your data blocked for the periods of retention or limitation set by law. At the end of these periods we will destroy the data.

This includes, but is not limited to, prevention of money laundering and terrorist financing legislation which sets out the obligation to retain data for a period of ten years after the expiry of the period of limitation for actions arising from the contract concluded between the parties.

The criteria that GENERALI uses to establish data maintenance timeframes have been determined according to the requirements established in applicable law, regulations and regulatory guidelines, as well as GENERALI’s operational requirements related to the adequate management of client relations.

G. Data protection rights

You are hereby informed that, further to current legislation, you are entitled to exercise your rights of access, rectification and challenge, and a right of removal, limitation on data processing and data portability, by verifying your identity (with a copy of your Spanish Identity Card (DNI) or its equivalent), at the following address: Generali España, S.A. de Seguros y Reaseguros, Calle Orense 2, 28020 Madrid, or by sending an e-mail to dataprotection.es@generali.com.

GENERALI enables you to exercise the following rights concerning your personal data:

- Access: obtain your personal data processed by GENERALI.
- Rectification: ask for your inaccurate or incomplete data to be rectified.

- Erasure: ask for your data to be erased when among other reasons they are no longer required for the purposes for which they were gathered.
- Restriction of processing: in certain circumstances you can ask us to restrict our processing of your personal data in which case we will only keep them for the purpose of exercising or defending legal claims.
- Objection: in certain circumstances and due to reasons related to your particular situation, you may object to the processing of your data, in which case we will stop processing them unless we show a compelling legitimate interest or for the purpose of exercising or defending legal claims.
- Portability: in certain circumstances, you may obtain your personal data in a structured, commonly used and machine-readable format and transmit those data to another controller when technically feasible.

For more information on your rights, please address the Spanish Data Protection Agency. Should you consider that your rights have been infringed, you are entitled to bring a claim before the Agency, located in calle Jorge Juan 6, 28001, Madrid.

Changes and updates to the privacy policy

Taking into consideration any possible modifications of the applicable privacy laws, the Company may totally or partially update this privacy policy. Any change or update will be reported pursuant to the applicable laws and also by means of publication on the Company's following website: <https://www.generali.es/quienes-somos/privacidad>