

## A. Controller

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### **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.

E-mail: delegadoprotecciondatos.es@generali.com.

## B. Purposes and grounds

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

### **i. Grounds on which to apply pre-contractual measures:**

- a. To manage and evaluate this insurance application, including automated individual decision-making, by appraising and evaluating your personal data in order to decide whether to accept and/or deny your insurance application, pursuant to what is foreseen in Article 22.2.a of General Data Protection Regulation (EU) 2016/679.
- b. To specify your requirements and needs, based on the information provided, as well as objective information on the insurance product requested, in a comprehensive manner, enabling you to make an informed decision, as required by Article 20 of Directive (EU) 2016/97 of the European Parliament and of the Council, of 20 January 2016, on insurance distribution.
- c. To provide you with an IPID (Insurance Product Information Document), on the product you are thinking of taking out, in order to guarantee that you receive any relevant information on such insurance, enabling you to easily make a comparison between various products offered, thereby making an informed decision as to whether or not to purchase the product, in accordance with Article 20 of Directive (EU) 2016/97 of the European Parliament and of the Council, of 20 January 2017, on insurance distribution.

### **ii. Grounds in order to fulfil a legal obligation:**

- a. To verify your identity, and to complete the relevant checks on your economic activity, as foreseen in current Spanish law on the prevention of money laundering.
- b. To evaluate, select and price any risks linked to the insurance contract you have requested, pursuant to Article 10 of Insurance Contract Act 50/1980, of 8 October, and Article 99.1 of Act 20/2015, of 14 July, on the arrangement, supervision and solvency of insurance and reinsurance entities.
- c. Reporting to any public or regulatory authorities or governmental bodies, if this is required by law, local regulations or further to mandatory obligations.

### **iii. Grounds based on GENERALI's legitimate interests:**

- a. 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.
- b. 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.

- c. 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.

#### **iv. Grounds in order to fulfil a public interest mission**

Report the claims rate data relating to your insurance to UNESPA, the Spanish Association of Insurers, which will process the data as the Party Responsible for the Report on fraud prevention in the general insurance class, which includes the insurance policy contracted by you. The purpose of the Report is the prevention and detection of fraud, either by notifying the insurance company once the policy has been issued, or by detecting fraud already committed in losses declared.

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](http://www.unespa.es)) and TIREA ([www.tirea.es](http://www.tirea.es)) websites.

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**

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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. Once this term has finalised they will become the parties responsible for said data, in accordance with the provisions of the specific industrial regulation applicable thereto.

## **D. Data source**

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Without prejudice to any personal data you and/or your insurance broker may have provided, Generali España, S.A. de Seguros y Reaseguros will process the personal data taken from common files, sectoral files, equity and credit solvency files and/or public authorities, 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

Specifically protected personal data are not obtained from third parties.

## **E. International transfers**

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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**

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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.

In particular, Money Laundering Prevention and the Financing of Terrorism legislation- if applicable- imposes an obligation to keep your data over a ten-year term, and commercial regulations establish a six-month conservation period once the actions derived from the parties' contract have lapsed.

## **G. Data protection rights**

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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@generalial.com](mailto:dataprotection.es@generalial.com).

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.generalial.es/quienes-somos/privacidad>