

## 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.

Contact details of the Data Protection Officer: [delegadoprotecciondatos.es@generali.com](mailto: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. Manage and evaluate this application and/or insurance proposal including automated individual decision-making by assessing and evaluating your personal data to decide whether to accept or reject your insurance application in compliance with Article 22(2)a of the General Data Protection Regulation (EU) 2016/679. In this case you have the right to obtain the intervention of a person from GENERALI to assess your situation, express your point of view or lodge a complaint if you are not satisfied.
- 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.
- d. 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 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 and terrorist financing.
- 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.
- 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](http://www.unespa.es)) and TIREA ([www.tirea.es](http://www.tirea.es)) websites

### **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 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.

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**

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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 application and/or insurance proposal 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**

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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, 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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GENERALI will keep the data from any application and/or insurance proposal which does not lead to a contract blocked for the periods of limitation set by law. At the end of these periods we will destroy the data.

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

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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@generali.com](mailto: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>