



Information memorandum

Personal data processing related to claims handling

Proper processing of your personal data is very important to our company and their protection is natural for us. Thus, we would like to give you detailed information about why we process your personal data, which are purposes for your personal data processing, which rights you have in connection with their processing, as well as other information that may be important to you regarding the processing of your personal data.

We would like to assure you that in AXA Assistance we adhere to strict rules that define which employee or department has access to your personal data and which personal data can be processed. Please read below the information we have written about our personal data processing so that this document is as clear and practical as possible for you.

AXA Assistance may update this privacy policy from time to time in response to changing legal, technical, or business developments. When updating this privacy notice, AXA Assistance will take appropriate measures to inform you, consistent with the significance of the changes made. AXA Assistance will obtain your consent to any material changes in this privacy policy if and where this is required by applicable data protection laws. This privacy policy was last updated on September 2nd, 2024.

Information on processing of your personal data

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1. The personal data controller

The personal data controller is the company, which determines the purposes and means of the processing of your personal data. Typically, it is the company, to which you provide your personal data.

The Controller of your personal data is Inter Partner Assistance S.A. with registered seat at Boulevard du Régent 7, 1000, Brussels, Belgium (hereinafter referred to as: “**Insurer**” or “**AXA**”). The Insurer is a part of the international AXA Group.

As part of his insurance activities, the Insurer acts as data controller, i.e. defines how and for what purpose your data will be used.

2. Data protection supervisor

The Insurer uses the services of the data protection supervisor who supervises proper processing of personal data. All necessary specimens of requests and applications concerning personal data protection can be found on the website www.romania.axa/gdpr/.

You can contact us in a manner that best suits your preferences and capabilities:

- by e-mail iodo@axa-assistance.pl,
- using a contact form on the website www.romania.axa/gdpr/,
- by post to the address:
ul. Giełdowa 1, 01-211 Warszawa.

You can contact the data protection supervisor in case of any questions concerning processing of your personal data and to exercise your rights indicated below.

3. The purpose of the processing of personal data

During claims handling process, including providing assistance services, your data may be processed for the purposes of:

- handling claims, including claims value calculation, its classification, and payment – the legal basis for this processing are contract performance as well as fulfilling our legal obligations;
- during the claims handling process we may verify your previous health conditions – the legal basis for this processing are contract performance, fulfilling our legal obligations and if required by legislation, consent, that you might give to us;
- fulfilling the controller's obligations related to reporting duties – the legal basis fulfilling our legal obligations;
- sanction list checks and CRS¹ – the legal basis for data processing is necessary to complete the legal obligation imposed on the controller as a result of the regulations e.g. on compliance with international tax obligations and sanctions and anti-money laundering legislation, and regulations on the automatic exchange of tax information with other countries;
- accounting, tax and billing purposes – the legal basis for data processing is fulfilling the legal obligation of the controller;
- fraud investigation and detection, including counteracting insurance crimes – the legal basis for this processing is the legitimate interest of the controller; the legitimate interest of the controller is to reduce losses arising from the criminal activities of individuals;
- check of multiple insurance, history of claims and agenda of regresses – the legal basis for this processing is the legitimate interest of the controller; the legitimate interest of the controller is to reduce unnecessary costs on claims handling;
- reinsurance of risks – the legal basis for data processing is the necessity of processing to implement the legitimate interest of the controller; the legitimate interest of the controller is to reduce the insurance risk associated with the concluded contract by reinsurance;
- deposition of documentation during their retention period – the legal basis for data processing is our legal obligation and legitimate interest; the legitimate interest of the controller is to keep the documents during the limitation periods in order to be able to prove certain facts e.g. in case of possible litigation;
- in case of motor third party liability insurance, we share data about insured vehicles and possible claims with the Czech Insurers' Bureau – the legal basis for data processing is fulfilling our legal obligation;
- statistical purposes – the legal basis for this processing are fulfilling the legal obligation and legitimate interests of the controller; the legitimate interest of the controller is to evaluate the risk and profitability parameters of the insurance portfolio and to reduce its risks;
- selling car wrecks – the legal basis for this processing is performance of a contract with you.

Should the special categories of your personal data be processed (usually data concerning health), their amount will be always minimal for fulfilling a particular purpose and based on the legal title as the following:

- processing is necessary for the establishment, exercise or defence of legal claims;
- processing is necessary for statistical purposes;
- processing is necessary to protect the vital interests of the data subject;
- consent, that you might give to us.

4. Categories of collected personal data

The following section describes the specific personal data, including examples. We only collect and store your personal data that are necessary for a particular purpose:

– Basic identification data

Your personal data such as the first name and surname, date of birth and identification number. When dealing with a business person we collect the trade name, company ID/IČO and registered office address.

– Contact data

The postal (mailing) address, telephone number and/or electronic mail address are necessary for us to deliver communications to you.

– Special categories of personal data

Processing of personal data for the purpose of uniquely identifying a natural person e.g. data concerning health, are necessary for proper claim evaluation and handling.

– Information concerning your policy

We keep the information about the chosen product and its specification, the estimation of age, the target destination and duration of the contract.

– Information concerning claims

We keep the information about the insurance event and its consequences, people involved in the event, witnesses, police protocols and information contained in them, etc.

– Geolocation data

We may access and process data about the place of an insurance event.

– Other personal data you may supply us in the future or which will be provided to us by the other entities, including the government institutions as Police, etc.

¹ CRS (Common Reporting Standard) – a regulation that provides for the automatic exchange of information in a global format.

5. The recipients or categories of recipients of the personal data

The protection and proper processing of your personal data is a legal obligation for the controller of your personal data. A controller can use processors to process the data. The processor of personal data is a natural or legal person, public authority, agency or other body, which processes personal data on behalf of the controller. In such cases, the protection of your personal data is guaranteed, both contractually and in terms of regulatory law, to the same extent as if the data were processed by controller.

Your personal data may be transferred to:

- insurance and reinsurance companies,
- entities that process personal data on our request, among others IT service providers, entities that process data for the purpose collection of receivables,
- providers of services to settle claims and provide a service, including the provision of assistance or recovery services, under your insurance policy,
- hospitals and medical facilities in case it is necessary to handle a claim,
- insurance intermediaries.

The main recipients of your data by categories are:

– Service providers

Coris Assistance S.R.L.

– IT providers

AXA GROUP OPERATIONS SAS, 81, Mstislav Rostropovitch, 65017, Paris, France

STRATOS.INF.CZ s.r.o.; IČO: 28250222

STRATOS Informativ spol. s r.o.; IČO: 14888840

Sprinx systems a.s.; IČO: 26770211

Mobile Internet s.r.o.; IČO: 29021251

PayU S.A., Poland; NIP: 779-23-08-495

Cebia, spol. s r.o.; IČO: 18628443

Audatex Systems s.r.o.; IČO: 27384110

Such entities process data on the basis of a contract with us and only according to our instructions.

We may share some of your personal data with other companies within the worldwide AXA Group who assist us with certain services, including overnight claims handling, call recordings and sanctions checking. These group entities will act on our behalf, and we remain responsible for how they use your personal data for these purposes.

We may also share your details with other companies within the worldwide AXA Group for the purposes of claims cost management, product improvement, personalization of product offerings and for the prevention and detection of fraud. We may also use the data for statistical purposes. Those companies will not be able to identify any individual data subject from the information we provide them.

We may also disclose your personal data to the following parties:

- Legal authorities or regulatory bodies,
- Parties involved with current or prospective legal proceedings, or assisting us to establish, exercise or defend our legal rights. For example, we may share information with our legal or other professional advisers,
- Other companies from the AXA Group to the extent that you have consented to us doing so, or where we are otherwise required or permitted to do so by law.

6. Transfer of personal data to a third country

Your data may be provided to a third country in a case where this is necessary to perform a specific benefit under the insurance contract you entered to (especially travel insurance).

In general, we only transfer your Personal Data within the European Union or to countries outside the European Union that guarantee an adequate and sufficient level of protection (meaning that your Personal Data benefits from the same level of protection as within the European Union).

In the event your Personal Data is transferred outside the European Union or to a country that is not considered adequate to other entities of the AXA Partners Group or more generally to the AXA Group, we provide guarantees to ensure the security and confidentiality of your Personal Data and regulate these transfers by the Binding Corporate Rules adopted by AXA (available via the following link – https://www-axa-com.cdn.axa-contento-118412.eu/www-axa-com/d686cd35-ea26-41a9-9e2e-a380716c4c40_axa_bcr_202403_va.pdf).

AXA is the first insurance group to have internal corporate rules approved by 16 European authorities for the protection of Personal Data. These rules guarantee an unambiguous and minimum level of protection for your Personal Data by the various companies of the AXA Group worldwide.

7. The period for which the personal data will be stored

Your personal data will be stored until lapsing the time for claims from insurance contracts or until the obligation to store data – resulting from the law – expires, in particular the obligation to store accounting documents on insurance contracts, international tax regulations. Therefore, in some cases, we may need to keep this data for a longer period. In such cases, we will inform you of this retention and you have the right to object.

The retention period of the claims cases is defined as the result of various criteria based on what the claim includes (e.g. a liability risk, or events like annuity, regress or litigation happened on a particular claim). The retention period is additionally increased by a limitation period. This means that retention periods are set differently for individual claims cases. However, the usual length of the retention period is 11 years.

When we handle the personal data, we apply the principle of minimization, which means that at the time when we have the obligation to delete your personal data, your personal data are deleted or anonymized from our databases and information systems. Within AXA Assistance, we have strict internal privacy rules that ensure that we do not keep the data for longer than we are authorized or required.

8. The rights of data subject

In accordance with the applicable data protection regulations, you have the right to:

- **Access to your Personal Data:** you have the right to request access to the Personal Data we process about you, and to obtain a copy of that data;
- **Rectify your Personal Data:** you have the right to ask us to rectify or complete the Personal Data that we process about you that are inaccurate, incomplete, or not up to date;
- **Request the limitation of the processing of your Personal Data:** You have the right to ask us to limit the processing of your Personal Data in the following cases:
 - Your data is inaccurate and require to be corrected or updated,
 - You would rather restrict the processing than delete your data,
 - Your data is no longer necessary to achieve the purpose of processing but still required for the constatation, exercise or defense of your legal rights,
 - You priorly opposed to the processing activity, if applicable;

This means that the Data Controller may simply keep your data but may not process or use it in any other way.

- **Request the deletion of your Personal Data:** you have the right to ask us to delete your Personal Data;
- **Right to portability of your Personal Data:** you have the right to receive the Personal Data you have provided to us in a suitable format and have the right to transfer that data to another data controller without us interfering.

Please refer to the contact details mentioned in the section No. 2 to exercise your rights or obtain more information.

You have the right to raise concerns about how your Personal Data is being processed with a competent supervisory authority, in the Member State of your habitual residence, place of work or place where you think an alleged infringement to your rights occurred. In Romania, the data protection authority is the Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal, B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, București.

Please note that there are certain limitations and exceptions applicable to the exercise of your rights, depending on the circumstances.

For any additional information, we invite you to visit the Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal website (<https://www.dataprotection.ro/>).

9. Whether the provision of personal data is a statutory or contractual

Providing personal data is not obligatory, but without providing personal data it is not possible to perform the insurance contract and handle claims.

10. The existence of automated decision-making

Performing the claims handling procedures, we do not use any kind of automated decision-making of profiling.

11. From which source the personal data originate

During the claims handlings procedures, personal data may be obtained from the various legal sources, as other insurance companies, police, witnesses, etc.

During the fraud prevention procedures, personal data may be obtained from various sources may be processed. Disclosing these sources would involve a disproportionate effort and is likely to render impossible or seriously impair the achievement of the objectives of that processing.