



Privacy Notice

with a view to compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council on General Data Protection

To enforce the principle of transparency, the Insurance Company intends to inform its Clients of its data processing procedures and its compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council on General Data Protection ("GDPR"). At the same time, to provide for comprehensive legal coverage, the Insurance Company **also publishes detailed documents relating to data processing on its website**, as well as at its **Customer Service** (which documents are also available in the insurance intermediary offices of tied insurance intermediaries).

The contact details of insurance intermediary offices are available on the website of the Insurance Company. Pursuant to Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information ("Info Act") and the GDPR, taking into account the provisions of Act LXXXVIII of 2014 on the Business of Insurance ("Insurance Act"), the Insurance Company provides the following information to **natural person** data subjects (Policyholders, Insured Persons, Beneficiaries, other Customers under the Insurance Act, hereinafter referred to collectively as the "Data Subject").

1. Name and contact details of the Data Controller, his representative, and the Data Protection Officer:

- **Data Controller: UNIQA Biztosító Zrt.**
- The name and contact details of the representative of the Data Controller and the Data Protection Officer are available on the website of the Insurance Company and displayed at the Customer Service. This information is also available to our customers in the insurance intermediary offices of the tied insurance intermediaries.

2. Recipients of the data transfer:

- **Data Processors:** On behalf of the Insurance Company, persons performing outsourced activities in connection with insurance contracts (Data Processors) at any time may act as data processors, who may access the data. In terms of the categories of recipients, such Data Processors are as follows:
 - domestic reinsurers and reinsurers located in a Member State that is a party to the Agreement on the European Economic Area,
 - electronic data-processing service providers,
 - IT (system maintenance, operation) service providers,
 - information security and software development service providers,
 - claims adjuster and expert claim assessor service providers,
 - private investigators involved in claims adjustment,
 - forensic medical experts involved in risk assessment and claims adjustment,
 - lawyers, law firms and collection agencies involved in claims adjustment and premium collection,
 - asset managers and printing house service providers.
- The current list of entities providing data processing for the Insurance Company is available on the Insurance Company's website.
- If, due to the nature of the product, it is indispensable for the performance of the service set out in the contract, the Insurance Company may, for the purpose of the performance of the contract, transmit the personal data of the Data Subject to a third country so that the Data Subject

may receive health care services or use other services abroad. In any event, the Insurance Company transfers the personal data of the Data Subject to its partner operating in the country of the service used by the Data Subject. If indispensable for the performance of the service, the Insurance Company may transfer data to third countries to the following scope of recipients:

- reinsurers,
- health service institutions,
- providers of health services,
- investigating authorities, prosecution services and courts.

3. Access to insurance secrets:

The Insurance Company is entitled to process the data of its Customers qualifying as insurance secrets. Provisions governing the processing of insurance secrets are set out in Sections 135 to 146 of the Insurance Act, which is available on the freely accessible website operating as an electronic public service specified by the Government of Hungary (currently: <http://njt.hu/>).

4. Your rights as a Data Subject

It is important for us that you are aware of your rights as a Data Subject as provided for in the data protection regulations. To this end, below we provide a non-exclusive list of your data protection rights as regards your data entrusted to us.

4.1. Right of access by the Data Subject

You are entitled to receive, at any time, sufficient information at our contact points about whether your personal data are being processed and if yes, you have the right to access your personal data stored by us, to request copies of such and to request information about the way we process your personal data.

4.2. Right to rectification

You have the right to have the Insurance Company, at your request, rectify or correct incorrect data without delay or to request the completion of incomplete data.

4.3. Right to erasure ('right to be forgotten')

You may request that we erase - without delay - certain personal data of yours that we store if:

- We no longer need the data in question;
- You withdraw your consent to the processing of certain data;
- You object to the processing of personal data;
- They need to be erased to comply with some legislative obligation;
- You are concerned about the legal basis of our processing of your data.

4.4. Right to restriction of processing

- If you have any question or concern about the processing, appropriateness or legality of our processing of your personal data, you may request the restriction of certain data processing activities. You may request restriction where we no longer need your data but you, as Data Subject, need them to submit, enforce or defend some legal claim of yours. You may also request such a restriction if you question the legal basis of data processing based on legitimate interest.
- During such a restriction, no data processing may be performed; data may only be stored. You will be informed by the Insurance Company of the release of the restriction in advance.

4.5. Right to data portability

You may request at any time that the Insurance Company make available your personal data, based on your consent or the legal basis of the contract, in a structured, commonly used and machine-readable format. Furthermore, you are entitled to transfer such data to another data controller without any hindrance by the Insurance Company.

If it is technically feasible, at your request the Insurance Company will directly transfer your personal data.

4.6. Right to withdraw consent

- If you consented to the use, processing or sharing of your personal data, you may at any time withdraw such consent if the data concerned are not required for the provision of the service.
- Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the Data Subject objects to processing for direct marketing purposes, the personal data may no longer be processed for such purposes. You may at any time withdraw your consent to direct marketing enquirers through a letter sent to the above postal address or to the lemondom@uniqa.hu e-mail address. Please state your name and partner code in the notification of withdrawal.

4.7. Legal remedies

- If you consider that your rights under the effective data protection regulations have been violated, you have the right to submit a complaint to the National Authority for Data Protection and Freedom of Information. **Contact details of the Nemzeti Adatvédelmi és Információszabadság Hatóság (The Hungarian National Authority for Data Protection and Freedom of Information):** Website: <http://naih.hu/>; Address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c; Postal address: H-1530 Budapest, P.O.BOX: 5.; Telephone: +36-1-391-1400; Fax: +36-1-391-1410; E-mail: ugyfelszolgalat@naih.hu
- In the event of unlawful data processing, civil proceedings may be initiated against the Insurance Company. Such proceedings may be filed at the court with competence at your residence, at your discretion.

5. Contact information of the Insurance Company for data processing matters

You may exercise your rights stated above through a letter sent to the email address adatvedelem@uniqa.hu or a letter to the postal address of **UNIQA Biztosító Zrt., H-1134 Budapest, Róbert Károly krt. 70–74.**

6. Unilateral amendment of this Notice The Insurance Company has the right to unilaterally amend the provisions set out in the section "*Data Processing, Data Protection*" above. The Insurance Company shall inform the Data Subjects on the working day directly preceding its entry into force at the latest, **through documents displayed at its customer centre and also by disclosing the amended provisions on its website. Data Subjects may also obtain information about the contents of the amendment in the insurance intermediary offices of the tied insurance intermediaries.**

The Insurance Company processes the personal data of the Data Subject for the purposes, on the grounds and for the duration specified below:

| Description and purpose of data processing | Legal basis of data processing | Scope of data processed | Period of storage of data |
|---|--|--|---|
| Communication of direct marketing enquiries. | GDPR Article 6(1)(a) – Consent of the Data Subject. | Name, postal address, email address and telephone number of the Data Subject. | Until the consent to data processing is revoked. |
| Data Processing relating to non-finalised offers. The object of data processing is to conclude the contracting process and enter into a contract. | GDPR Article 6(1)(a) – Consent of the Data Subject. | Personal data submitted by the Data Subject for the conclusion of the contract and completion of forms, personal data generated in the course of the performance of the insurance contract. Health data supplied by the Insured Person or acquired from third parties pursuant to the authorisation given by the Insured Person for the purposes of establishing health risks relevant for the performance of the insurance contract. The Insurance Company processes exclusively the data concerning the health of the Insured Person that is essential for the performance of the insurance contract (“Health data processing”). | |
| Assessment of insurance risks. | GDPR Article 6(1)(b) – Data processing necessary for the conclusion and performance of an insurance contract. | | |
| Rejection of the offer for an insurance contract. | | | |
| Satisfaction of obligations specified in the FATCA regulation (e.g. data transfer). | GDPR Article 6(1)(c) – processing necessary for compliance with a legal obligation, to which the Insurance Company is subject. The legal obligation arises from the FATCA regulations, including Act XIX of 2014 on the Promulgation of the Agreement between the Government of Hungary and the Government of the United States of America to Improve International Tax Compliance and to Implement the FATCA Regulation, and on the Amendment of Certain Related Acts. | | During the term of the insurance contract and after the termination of the insurance relationship, the Insurance Company processes data until the expiry of claims deadlines in the event of a claim against the Insurance Company. |
| Compliance with obligations set out in the CRS regulation (e.g. establishment of residence for tax purposes). | GDPR Article 6(1)(c) – processing necessary for compliance with a legal obligation, to which the Insurance Company is subject. The legal obligation arises from the CRS regulations, including inter alia Act CXC of 2015 on the Promulgation of Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information as well as Act XXXVII of 2013 on International Administrative Cooperation in Matters of Taxation and Other Compulsory Payments. | | |
| Compliance with the obligations of the Insurance Company relating to the prevention of money laundering (e.g. the KYC measures). | GDPR Article 6(1)(c) – processing necessary for compliance with a legal obligation, to which the Insurance Company is subject. The legal obligation arises from the insurance relationship and from Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing. | | |
| Performance of the Insurance Company's obligations relating to the provision of services (e.g. payments). | GDPR Article 6(1)(c) – processing necessary for compliance with a legal obligation, to which the Insurance Company is subject. The legal obligation arises from the insurance relationship and from Act CL of 2017 on the Rules of Taxation. | Tax identification code of the Data Subject. | |
| Conclusion of the insurance contract. | GDPR Article 6(1)(b) – Data processing necessary for the conclusion and performance of an insurance contract. | | During the term of the insurance contract |
| Amendment of the insurance contract. | | | |
| Maintenance of the insurance contract | | | |
| Assessment of the claim for insurance benefits. | GDPR Article 6(1)(b) – Data processing necessary for the conclusion and performance of an insurance contract. | Personal data submitted by the Data Subject for the conclusion of the contract and completion of forms, personal data generated in the course of the performance of the insurance contract. If necessary for the performance of the data processing purpose concerned, health data processing. | During the term of the insurance contract and after the termination of the insurance relationship, the Insurance Company processes data until the expiry of claims deadlines in the event of a claim against the Insurance. |
| Performance of the insurance contract, including the provision of insurance benefits. | | | |
| Assessment of the claims of the Data Subject arising from the insurance contract. | | | |
| Submission of defense against legal claims arising from insurance contracts. | | | |
| Enforcement of the claims against the Insurance Company arising from insurance contracts. | GDPR Article 6(1)(c) – processing necessary for compliance with a legal obligation, to which the Insurance Company is subject. The legal obligation originates from the insurance contract and the Insurance Act, as well as Act V of 2013 on the Civil Code. | | |
| Response to requests from courts or authorities relating to the insurance contractual relationship. | GDPR Article 6(1)(c) – processing necessary for compliance with a legal obligation, to which the Insurance Company is subject. The legal obligation originates from the insurance contract, the Insurance Act, Act V of 2013 on the Civil Code and sectoral legislation applicable to the area of law concerned. | | |
| Termination of the insurance contract. | GDPR Article 6(1)(b) – Data processing necessary for the conclusion and performance of an insurance contract. | | |
| Compliance with the obligation of safeguarding accounting records. | GDPR Article 6(1)(c) – obligation of the Insurance Company to safeguard accounting records pursuant to Section 169 of Act C of 2000 on Accounting (“Accounting Act”). | Personal Data in the accounting records. | Pursuant to Section 169 of the Accounting Act, for 8 years. |

The Data Subject may withdraw his consent to the processing of personal data at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

The legal basis of the processing of the health data of the Data Subject is the written consent of the Data Subject.