

Information for customers on use of their data and their rights

Dear Customer, in accordance with Arts. 13 and 14 of the General Data Protection Regulation (EU) 679/2016 (hereinafter the "Regulation"), we inform you that, in order to provide you with insurance products and/or services requested by or envisaged for you we need to collect and use certain data relating to you.

WHAT DATA DO WE COLLECT?

Our Company will use your personal data (such as, name, surname, residence address, date and place of birth, occupation, landline and mobile phone numbers and e-mail address, bank details, claims with other insurance companies, information on socio-economic data as income, ownership of registered real estate and movable assets, information on your possible business activity, information on creditworthiness) that you or others⁽¹⁾ give us; the data may also include specific categories of personal data⁽²⁾, which are indispensable for the provision to you of the aforementioned insurance services and/or products.

WHY WE ASK FOR YOUR PERSONAL DATA?

Our Company will use your data for purposes strictly related to the insurance activity, such as, among other things, (i) the provision of contractual services and insurance services requested by you and the execution of the related regulatory, administrative and accounting obligations, (ii) the performance of activities of fraud prevention and control, (iii) the possible exercise and defence of judicial rights, as well as (iv) the performance of data analysis and processing (excluding particular ones) for tariff and statistical purposes, according to parameters of product, policy characteristics and information on claims, commercial and credit information (relating to your reliability and punctuality in payments).

In relation to the purposes referred to in point (i), the processing of your data is necessary both for the execution of the pre-contractual activities requested by you (including issuing an estimate and quantification of the premium), as well as for the completion and execution of the insurance contract⁽³⁾, both for fulfilment of the related legal and regulatory obligations in the insurance field, including the provisions issued by public entities such as the Judicial Authority or the Supervisory Authorities⁽⁴⁾. The processing of your data is also necessary for the pursuit, by our Company, by other Companies of the Group and by the third-party recipients within the insurance chain (see note 7), of legitimate interests related to the performance of the activities related to the purposes referred to in points (ii), (iii) and (iv).

We will process your personal data falling within specific categories of personal data (for example, relating to your state of health) only after having obtained your explicit consent⁽⁵⁾.

The provision of your data for the aforementioned purposes is therefore necessary for the stipulation of the policy and to provide you with the services requested; in certain cases it is mandatory by contract or by law. Therefore, failure to provide the necessary and/or mandatory data for the aforementioned purposes could prevent completion of the contract or the provision of the contractual services requested by you. On the other hand, the release of certain additional data relating to your contact details, indicated as optional, may be useful to facilitate the sending of notices and service communications, but does not affect the services requested. We would also inform you that some of the personal data you provide (name, surname, policy number, e-mail address) will be processed by our Company to identify you and send you communications concerning the methods of access to the personal area reserved for you to make use of certain dedicated services. This data may be used, in the case of technical assistance, for the management of problems relating to the access or consultation of the said area. In the absence of these data, we will not be able to properly provide you with the services requested.

WHO DO WE COMMUNICATE YOUR DATA TO?

Your data will not be subject to disclosure and may be known only by authorised personnel of our Company's departments responsible for providing insurance products and services relating to you and by trusted third parties to whom we confide some technical or organisational tasks. These parties act as data processors on our behalf⁽⁶⁾.

Your data may be disclosed to other companies of the Unipol Group⁽⁷⁾ for internal administrative purposes and for the pursuit of legitimate interests related to the performance of activities related to the purposes referred to in points (ii), (iii) and (iv) above. For specific fraud prevention and assessment needs, the data may also be communicated to insurance companies not belonging to the Group, where it is indispensable for the pursuit by our Company and/or the latter of legitimate interests related to such needs or in any case for the conduct of defensive investigations and the judicial protection of rights in the criminal sphere.

Your personal data may be also communicated to public and private parties outwith our Company that are involved in the provision of insurance services relating to you or for operations necessary for the fulfilment of the obligations related to insurance activities⁽⁸⁾ (see also note 4).

HOW DO WE PROCESS AND HOW LONG DO WE STORE YOUR DATA?

Your personal data will be processed using appropriate methods and procedures, including computerised and electronic, preserved by appropriate organisational, technical and security measures and stored for the duration of the insurance contract and, at the end of it, for the time required by law concerning the conservation of documents for administrative, accounting, tax, contractual and insurance purposes (as a rule, 10 years), as well as in the case of disputes, for the period of prescription of the related rights.

WHAT ARE YOUR RIGHTS?

Privacy legislation (arts. 15-22 of the Regulation) grants you the right to access your data at any time, as well as to request rectification of or additions to the data if inexact or incomplete, erasure of the data or restriction of processing thereof if there are valid reasons for doing so, or to object to the processing thereof for reasons attributable to your specific situation; you also have the right to data portability, where the data has been processed by an automated system for the provision of the contractual services requested by you, within the limits of the provisions of the Regulation (art. 20), as well as the right to withdraw your consent given for the purposes of processing that require it (such as the use of health data), without prejudice to the lawfulness of the processing carried out up to the time of revocation.

The controller of your data is SIAT Società Italiana di Assicurazioni e Riassicurazioni p.A. (www.siat-assicurazioni.it) with offices in Via V Dicembre, 3 - 16121 Genoa. The data protection officer remains at your disposal should you have any questions or require further information: you may contact him at the premises of SIAT Società Italiana di Assicurazioni e Riassicurazioni p.A. by email at privacy.siat@unipol.it, not only to exercise your rights, but also to be informed of the updated list of categories of data recipients as per Note (8).

The foregoing is without prejudice to your right to submit a complaint to the Italian Data Protection Authority (Italy's data privacy watchdog), where deemed necessary for the protection of your personal data and your rights in relation thereto.

Notes

- 1) For example, holders of insurance policies whereby you are insured or a beneficiary, or any co-obligors; other insurance operators (such as insurance intermediaries, insurance companies, etc.), from which data relating to policies or claims can also be acquired for fraud prevention purposes; associations (e.g. ANIA) and insurance industry consortia, other databases and other public parties; parties from which we request commercial and credit information to satisfy your requests (e.g. the issue or renewal of insurance cover, payment of a claim, etc.) - in particular through third-party companies that manage Credit Information Systems (Sistemi di Informazioni Creditizie - SIC) related to requests and financing relationships, in which banks and financial companies participate.
- 2) They are data likely to reveal not only a person's state of health, but also their religious or philosophical beliefs, political opinions or trade union membership. In certain specific cases, where strictly necessary for the purposes authorised by Law and the reasons indicated above, the Company may also collect and process data relating to any criminal convictions or criminal offences.
- 3) For example, in order to prepare or execute insurance contracts (comprising those implementing supplementary pension schemes, as well as membership of individual or collective pension schemes set up by the Company), for the collection of premiums, the payment of claims or the payment for or provision of other services; for reinsurance and co-insurance; for the fulfilment of other specific contractual obligations; for the prevention and identification, jointly with the other Group companies, of insurance fraud and the related legal action; for the constitution, exercise and defence of the insurer's rights; for the analysis of new insurance markets; for operations and internal control; for statistical and tariff activities.
- 4) For the fulfilment of specific legal requirements, such as (i) instructions issued by IVASS, CONSOB, COVIP, Bank of Italy, AGCM or the Data Protection Authority, (ii) matters concerning tax assessments, (iii) for requirements concerning the identification, conservation and adequate verification of the customer and the conduct of due diligence thereon and for the reporting of suspicious transactions in accordance with anti-money laundering and counteraction of financing of terrorism legislation (Legislative Decree 231/07), (iv) for regulations implementing a centralised computer archive kept by Consap on behalf of the Ministry of Economy and Finance (in its capacity as data controller) for the purpose of the prevention of fraud and identity theft, as well as other databases for which the communication of data is mandatory. The complete list is available from our head office or the data protection officer.
- 5) Possible processing of such data remains, where indispensable for the conduct of defensive investigations and for the judicial protection of criminal rights with respect to unlawful and fraudulent behaviour.
- 6) For example, IT and telematic or storage service providers; service providers entrusted with the management, settlement and payment of claims; companies supporting operations including postal service companies; audit and consulting firms; providers of business information in connection with financial risks; fraud verification service providers; and debt recovery companies.
- 7) Unipol Group, the parent company of which is Unipol Group S.p.A. The companies belonging to Unipol Group to which the data may be communicated are, for example, Linear S.p.A., Unisalute S.p.A. etc. For further information, please see the list of Group companies available on Unipol Gruppo S.p.A.'s website www.unipol.it.
- 8) Specifically, your data may be communicated and/or processed by parties that form part of the so-called "insurance chain", in Italy and, where necessary for the provision of services requested (for example, warranty assistance), in European Union countries or in countries outwith the EU, such as: other insurers; co-insurers and reinsurers; insurance and reinsurance intermediaries and insurance contract acquisition channels; banks; securities brokerage firms; asset management companies; depositary banks for pension funds, fiduciary doctors, appraisers, car repair shops and lawyers; private investigators; settlement service companies; clinics or affiliated health facilities (the complete list is available from our head office or the data protection officer). Any transfer of your personal data to parties established outside the European Union shall, however, take place in compliance with the limits and requirements of European legislation, of Regulation (EU) 679/2016 and of instructions issued by the Data Protection Authority.