

## Information for the interested party on use of their data and their rights

Dear Madam/Sir,

in accordance with Art. 13 of the General Data Protection Regulation (EU) 679/2016 (hereinafter the "Regulation"), we inform you that the Company of our Group against which the request for liquidation of the claim is presented, must collect and use some of your personal data, in order to assess the same claim and provide you with the related insurance and settlement services. The Companies of the Unipol Group have entrusted the relevant claims management and settlement service<sup>(1)</sup> to UnipolSai Assicurazioni S.p.A., as responsible for the processing of personal data<sup>(2)</sup>, through which this information is provided.

### WHAT DATA DO WE COLLECT?

These are personal data (such as, name, surname, residence address, date and place of birth, occupation, phone number and e-mail address) that you or others<sup>(3)</sup> give us, in addition to any other data already acquired by the Company at the time of activating the policy, as well as data relating to the claim concerning you<sup>(4)</sup>; the data may also include specific categories of personal data<sup>(5)</sup> (for example, relating to your state of health), if indispensable to assess any damage suffered, as well as for the provision to you of the aforementioned insurance services. Provision of these data is essential for these purposes<sup>(6)</sup>; in certain cases, it is mandatorily required by current law on insurance and by instructions issued by bodies such as judicial authorities, other authorities or supervisory authorities<sup>(7)</sup>; in the absence of such data, we will not be able to provide you with all of these services. The optional provision of certain further data relating to your contact details may also help to facilitate the sending of service-related notices and communications.

### WHY DO WE ASK FOR YOUR PERSONAL DATA?

Your data will be used by our Company for purposes strictly related to insurance activities, such as, *inter alia*, (i) the provision of insurance services provided for you in case of claim 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) tariff and statistical analyses (for these purposes, data, excluding particular ones, may be processed according to parameters of product, policy characteristics and information on claims)<sup>(8)</sup>; where necessary, for the aforementioned purposes, your data may also be acquired and used by other companies in our Group<sup>(9)</sup>. Processing for the purposes set out in points (ii), (iii) and (iv) above is necessary for the pursuit of the legitimate interests of our Company and of other Group Companies for the conduct of the activities indicated above.

Your personal data may be communicated to public and private parties within and outwith our Company that are involved in the provision of insurance services relating to you<sup>(10)</sup> or for operations necessary for the fulfilment of the obligations related to insurance/settlement activities<sup>(7)</sup>, also taking into account, where not required by law, the legitimate interests of our Company and of these parties to perform these services and operations in relation to the claim that concerns you. 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. For the purposes of managing and settling the claim, 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<sup>(11)</sup>.

### HOW DO WE PROCESS YOUR DATA?

Your personal data will not be disclosed to others, they will be processed by employing appropriate means and procedures, including IT and computerised systems, and may become known solely to persons duly authorised by the Company to provide insurance services relating to you and by trusted third parties to which we entrust certain duties of a technical or organisational nature and which operate as data supervisors on our behalf<sup>(12)</sup>. Your personal data will be stored in full accordance with the security measures laid down by personal data protection regulations for the duration of the insurance contract and, after the expiry thereof, for the period prescribed by regulations concerning the storage of documents for administrative, accounting, tax, contractual and insurance purposes (normally 10 years)<sup>(13)</sup>.

### 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 rectify and/or add to the data if inexact or incomplete, to obtain 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 can also ask for portability of the data that you have provided, where the data have been processed by an automated system for the provision of the contractual services requested by you or with your consent, within the limits 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 references of the Group insurance company involved in your claim as data controller are provided below:

- UnipolSai Assicurazioni S.p.A. - Via Stalingrado 45 - 40128 Bologna (BO) [www.unipolsai.it](http://www.unipolsai.it) e-mail: [privacy@unipolsai.it](mailto:privacy@unipolsai.it)
- Compagnia Assicuratrice Linear S.p.A. - Via Larga 8 - 40138 Bologna (BO) [www.linear.it](http://www.linear.it) e-mail: [privacy@linear.it](mailto:privacy@linear.it)
- SIAT Società Italiana Assicurazioni e Riassicurazioni S.p.A. - Via V Dicembre, 3 - 16121 Genoa (GE) [www.siat-assicurazioni.com](http://www.siat-assicurazioni.com) e-mail: [privacy.siat@unipol.it](mailto:privacy.siat@unipol.it)
- Incontra Assicurazioni S.p.A. - Corso di Porta Vigentina 9 - 20122 Milano (MI) [www.incontraassicurazioni.it](http://www.incontraassicurazioni.it) e-mail: [privacy.incontraassicurazioni@unipol.it](mailto:privacy.incontraassicurazioni@unipol.it)

The data protection officer remains at your disposal should you have any questions or require further information: you can contact him at the above-mentioned address of the insurance company involved in your claim, not only to exercise your rights, but also to be informed of the updated list of categories of data recipients<sup>(10)</sup>. 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) With the exception of SIAT Società Italiana Assicurazioni e Riassicurazioni S.p.A. only for claims relating to insurance coverage for hulls and cargo.
- 2) The insurance companies also process data through SIAT Società Italiana Assicurazioni e Riassicurazioni S.p.A. (in the event of a claim relating to insurance coverage for marine hulls and cargo).
- 3) 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 and claims can also be acquired for fraud prevention purposes; associations (e.g. ANIA) and insurance industry consortia; other public parties.
- 4) If the vehicle involved in the claim is equipped with a satellite device, as indicated in the information contained in the vehicle itself, the Company will also process the data recorded by this device to reconstruct the dynamics of the accident and determine eventual responsibilities, above all data relating to the GPS position of the vehicle that identify the mileage driven during the time period (e.g. days), type of road (e.g. urban, extra-urban roads, motorways), time of day (e.g. day or night time), territory (e.g. province, municipality), ignition time, breakdowns and malfunctions and data relating to vehicle speeds/ accelerations/ decelerations beyond certain thresholds.
- 5) These are data that reveal not only one's state of health, but also one's racial or ethnic origin, religious or philosophical beliefs, political opinions and trade union membership, as well as genetic or biometric data for the unique identification of a natural person. In certain specific cases, where strictly necessary for the purposes authorised by law (like fraud prevention) and the reasons indicated above, the Company may also collect and process data relating to any criminal convictions or criminal offences.
- 6) For example, in order to prepare the payment of claims or the payment for or provision of other services; for recovery of the vehicle or organising first aid; for the fulfilment of other specific contractual obligations; for the prevention and identification of insurance fraud and the related legal action together with the other Group companies; for the constitution, exercise and defence of the insurer's rights; for operations and internal control; for statistical and tariff activities.
- 7) 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 with related communications to the Tax Authorities, (iii) for requirements concerning the identification and registration of the customer and adequate 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) supplying information to 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, (v) supply information to other databases for which the communication of data is mandatory, such as the Central Accident Records Office and the SITA ATRC Database on Risk Certificates managed by ANIA. The complete list is available from our head office or the data protection officer.
- 8) For these purposes, if the vehicle used is equipped with a Unibox device, the Company will process the data of the same vehicle in aggregate form by distance travelled, type of routes and driving style and it will not be possible to identify it.
- 9) Unipol Group, the parent company of which is Unipol Group S.p.A. For further information, please see the list of Group companies available on Unipol Gruppo S.p.A.'s website [www.unipol.it](http://www.unipol.it).
- 10) In particular, your data may be communicated and/or processed by the company in charge of processing your claim, by companies of the Unipol Group (the complete list of Unipol Group companies is visible on the Unipol Gruppo S.p.A. website [www.unipol.it](http://www.unipol.it)) and by parties that are part of the so-called "insurance chain", in Italy and possibly, where necessary for the provision of the services requested (for example in the context of assistance guarantee), in countries of the European Union or even outside the EU, such as: other insurers; co-insurers and reinsurers; insurance and reinsurance intermediaries and insurance contract acquisition channels; banks; fiduciary doctors; appraisers; lawyers; private investigators; car repair shops; settlement service companies; clinics or affiliated health facilities; as well as entities and bodies, including those forming part of the insurance industry of a public or associative nature for the fulfilment of legal and regulatory obligations (such as CONSAP); other databases for which the communication of data is mandatory, such as the Central Accident Records Office (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.
- 11) Processing of such data remains, where indispensable for specific needs linked to the conduct of defensive investigations and for the judicial protection of criminal rights with respect to unlawful or fraudulent behaviour.
- 12) 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; debt recovery companies; other parties or other databases for which the communication of data is mandatory.
- 13) With reference to the data collected through the satellite device, it should be noted that in the event of a claim or anomalous event, the precise data relating to the GPS position and accelerometers relating to such claim or anomalous event will be kept by the Company for a period of 2 years and, in the event of a claim for compensation received by the Company, for a longer period that may be necessary to handle the settlement procedure and related processes. The data in aggregate form by mileage travelled, type of routes and driving style will instead be kept for a period of [3] years from collection. Once these terms have expired, the data will be automatically deleted.

