

Helvetia Global Solutions Ltd, registered in the Principality of Liechtenstein under the number FL-0002.191.766-9, based in Vaduz (FL-9490) at Aeulestrasse 60, as a personal data administrator, has prepared the present Notification relating personal data protection for the purposes of informing on scope of collection, use, transfer and processing of some personal data allowing for identification of persons (hereinafter referred to as "Personal data").

The present notification (hereinafter referred to as "Notification") on Personal data protection defines types of Personal data processed by Insurer in relation to conclusion of insurance agreement and purposes of its processing. In some cases, Insurer can transfer Personal data to third parties. The present Notification clarifies on third parties/recipients of data (or their categories), which the Insurer can transfer Your Personal data to, purposes of such transfer and security measures taken in order to protect Your Personal data.

Scope of Personal data collected by Insurer

Insurer can collect / gather Personal data in accordance with the scope defined in Policy / Certificate in relation to conclusion of the insurance agreement.

Purposes of using and processing Personal data by Insurer

In order to enable execution of insurer's business actions as well as performance by Insurer of provisions resulting from insurance agreement, Insurer is entitled to use and process above mentioned personal data in scope essential for below actions and for following purposes:

- a) conclusion and execution of insurance agreement;
- b) creation and presentation of Insurer's full product offer;
- c) performance of analysis and statistical researches by Insurer.

Legal basis for processing of Personal data by Insurer

Collection/gathering, processing and using of Personal data by Insurer is based on the following legal basis:

- a) based on art. 6 lt. 1 b) of Regulation of European Parliament and EU Council 2016/679 dated 27th April 2016 on natural persons' protection relating to processing of personal data and on free flow of such data and repeal of directive 95/46/WE ("RODO") as essential to execute insurance agreement;
- b) based on art. 6 lt. 6 c) RODO as essential to perform legal duties incumbent upon Insurer, i.e. assessment of insurance risk based on art. 41 of insurance and reinsurance activity law;
- c) based on art. 6 lt. 6 c) RODO as essential for the purposes resulting from legally justified interests performed by Insurer, which should be understood as:
 - internal administration purposes of Insurer,
 - marketing and sales purposes related to development of products and preparation of offers to customers.

Implications of not indicating Personal data

Provision of Personal data is required under Art. 41 of Insurance and Reinsurance activity law. Failure to provide Personal data will disable conclusion and execution of insurance agreement.

Circumstances under which a Personal data can be transferred to a third parties:

Insurer can transfer Personal data to the following third parties for purposes relating to execution of provisions of insurance agreement:

- a) Companies or persons, which Insurer has cooperation agreement concluded with for due performance of insurance agreement ("Data processing Parties"). Unless is it essential for Purposes relating to performance of insurance agreement, which has been indicated above, Data processing Parties can be entitled to perform procedures relating to sales system's administration, generation of policies, authorization of claims and other activities for and on behalf of Insurer. Such Parties, based on agreements concluded by them, shall be required to comply with certain security, technical and organizational measures, in order to protect Personal data as well process these data only in accordance with the instructions provided by Insurer. Insurer transfers Personal data to the following Data processing Parties:
 - managing the Insurance Company Helvetia Global Solutions Ltd, registered in the Principality of Liechtenstein under the number FL-0002.191.766-9, based in Vaduz (FL-9490) at Aeulestrasse 60;
 - Representative of Insurer – WAGAS S.A. with its registered office in Warsaw, performing Claims Handling Centre for and on behalf of Insurer;
 - Insurance agents
- b) Supervising authorities, relevant authorities and third parties. As it is essential for execution of Purposes relating to performance of insurance agreements, which have been described above and fulfilment of duties imposed by law, Personal data can be transferred to supervising authorities, courts and other relevant authorities (e.g. tax authorities and law enforcement authorities), independent external advisors (e.g. auditors) or providers of services.

Security measures used by Insurer in order to protect Your Personal data

To protect Your Personal data, Insurer undertakes to use relevant security measures both in terms of technical and organizational measures.

Personal data retention period by Insurer

Insurer will process Personal data via electronic means, information and in paper form. Personal data will be retained by Insurer and/or Data processing parties, only in scope necessary to perform our duties and only during the time essential for achievement of purposes, for which these data are collected and in accordance with required period of retaining insurance documentation (i.e. during the period defined within art. 819 § 1 in relation to art. 819 § 3 of Civil Code law in relation to art. 29 of insurance and reinsurance activity law, dated 11th September, 2015).

Rights You have in relation to Personal data protection

You have many rights relating to Personal data protection. In accordance with the acting law on data protection, You have right to lodge a complaint to a relevant supervising authority (i.e. Inspector General for the Protection of Personal Data or authority being its successor).

In addition, You have right to:

- a) Demand access to Personal data: person, data subject, is entitled to receive from Insurer confirmation, whether personal data him/her concerning are processed, and if that is the case, is entitled to gain access to these data. Access to information means among others obtaining information – on purposes of processing, personal data relevant categories, and on recipients or relevant categories of recipients, whom Personal data was or will be disclosed. However, right to access can be limited due to justified interest of third parties. On Your request, Insurer will provide You with copy of Personal data subject to processing, relating to You. For any further copies, which You will demand for, Insurer can collect fee in reasonable amount resulting from administration costs.
- b) Correct data: You have right to correct Personal data, which relate to you, and which are incorrect. Subject to purposes of processing, You have right to demand to supplement incomplete Personal data, including via submission of additional statement.
- c) Delete data ("right to be forgotten"): You have right to demand, if circumstances foreseen by law have incurred, for immediate deletion of Your Personal data, and Insurer is obliged to delete such Personal data without undue delay.
- d) Limit processing of Your Personal data: In such case, Insurer, on Your demand, will point to such Data and its processing can be limited only to certain purposes. Due to the fact, that Insurer processes and uses Your Personal data in order to execute provisions resulting from insurance agreement which binds Insurer with You in the first place, Insurer can point to existence of important legally justified basis for processing, overriding to interests, rights and freedom of person, whom data relate to, unless such processing is related to marketing activities.
- e) Move data: under certain conditions, You have a right to receive Personal data relating to You in structured, commonly used format available in machine readable form, which has been supplied to Insurer, and You have a right to transfer these Personal data to other entity without any obstacles from Insurer's side.
- f) Object: in certain circumstances, You have a right to file objection at any time – due to reasons relating to Your special situation – in terms of processing Personal data relating to You, and Insurer can be obliged to stop processing such Personal data.

Contact

In case of any questions relating to the present Notification or performance of rights in terms of privacy, please contact Insurer via WAGAS S.A., 515 Rydygiera Street, 01-793 Warsaw, Poland, by phone: 22 860 04 80 or email: personaldata@wagas.eu

We hereby inform about possibility of updating Notification periodically in accordance with the acting law (e.g. if we implement new systems or processes, involving using personal data) and in such case we will be informing You in due course on implemented changes.