

**Legal Information to subjects of Personal Data in accordance with the E.U. General Data Protection Regulation n° 2016/679 and the Greek Legislation**

**Aegean Insurance S.A.**, hereinafter referred to as “**Aegean or Company**”, is the Tax & Special Claims Representative of the foreign insurance company Accredited Insurance (Europe) Limited. **Aegean** acts as Data Controller of all personal data required on behalf of the insurance company and processed in its normal course of business for existing and/or prospective clients, claimants, and users, all hereinafter referred to as “user”, of all Company’s electronic/web services.

As a reminder, **Aegean** respects privacy and ensures that all personal data processed is done with confidentiality and in accordance with applicable laws on data Privacy.

Aegean is likely to collect the following personal data in its normal course of business:

**1. What information does Aegean collect?**

**Personal Data:**

- Name
- Last Name
- ID Number
- Number of V.A.T.
- Date of Birth
- Place of Birth

**Contact Data:**

- Mail Address
- Home Address
- e-mail Address
- Phone Number
- Fax Number

**Insurance Policy Data:**

Required information (documents) for the issuance of an insurance policy through risk-based (underwriting) rules (e.g. Road Behaviour, Claims History, Profession/Occupation, Medical History e.tc.).

**Payment Data:**

- Bank account
- Debit/Credit card details, either for the payment of premiums or other financial obligations to Aegean

**Claims Data:**

Required information for claim handling, including all supporting documents on the basis of contractual requirement for assessing and closing a claim file.

**Other Data:**

Personal information published in the internet, social media or other public databases.

## **2. What is the purpose of your personal data processing?**

The data you provide will be mainly used by Aegean for the following purposes:

Specifically:

- Ensuring the fulfilment of Aegean's contractual obligations of managing your account and/or in the event of a claim.
- Meeting any compliance, legal or regulatory obligations, in accordance with Greek and European Law.
- The support, promotion, and execution of your requests as a user of our electronic services.
- For the management of the insurance policy throughout its duration as well after its expiry, including the assessment and settlement of the insurance indemnity in the event of the risk occurrence or of a complaint.

## **3. What is the legal ground of the data processing?**

The legal ground of the data processing is the performance (pre-contractual measures), the conclusion, and the execution of the terms of the insurance contract.

The processing takes place with your written consent after special information in case of processing special categories of personal data.

The legal ground of the data processing is the company's compliance to obligations arising by the applicable legal and regulatory framework.

The legal ground of the data processing is the legitimate interests of the company.

## **4. Where is your personal data collected from?**

Personal data is obtained from your insurance application and the supporting documents submitted, your details passed on in the event of a claim, your claim compensation and the supporting documents disclosed, through any methods, including direct interactions, calls, oral and/or written, electronically, affiliate Road Assistance-Interamerican, through third bodies, i.e., associated insurance intermediaries and brokers, lawyers and/or any party authorized by you.

**Aegean** collects your personal data and sensitive personal data as part of providing services to you. Aegean may search and collect data from selected third parties i.e. experts, car repair shops, lawyers, insurance intermediaries, Public Authorities, as well as hospitals and medical diagnostic centers with your consent.

## **5. How long is your personal data retained?**

Information submitted for the issuance of an insurance policy, is retained for a period of twenty (20) years after the ending of the client/insurer relationship.

In the event of filing a claim, Aegean will process your personal information until settlement and will be stored electronically for a period of fifteen (15) years, from the date of initiating the claim.

In the event of ongoing court proceedings, which concern you directly or indirectly, the retention may be extended till the court ruling.

In the event that you contact the company through its electronic services, and you have not concluded an insurance policy or have not a claim, we will keep your personal data for one (1) year from the relevant communication. Quotation data received is stored on the database for a period of fifteen (15) days.

## 6. What are your rights relating to the processing of your personal data?

### **The Right of Access:**

This enables you to receive information on how your personal data is processed and a copy of the personal data we hold about you.

**The Right to Rectification:** This enables you to have a request correction of your personal data we hold about you if it is inaccurate, incomplete and/or out of date.

**The Right to Erasure:** This enables you have your personal data deleted or removed where there is no compelling reason for its continued processing. i.e. other than claims handling and compensation and legal grounds.

**The Right to Data Portability:** This enables you to have your personal data transferred to a third party.

**The Right to Restriction:** This enables you to request suspension of processing your personal data in case of wanting to:

- establish the accuracy of the data hold
- establish where the data is used
- establish unlawful use or processing

Nevertheless, if agreed to restrict data processing with any of the above requests, the insurance policy may be terminated, where this conflicts with your contractual obligations.

**The Right of Objection:** This enables you to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority, including profiling, direct marketing and/or processing for purposes of historical research and statistics. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Nevertheless, if agreed to object data processing with any of the above requests, the insurance policy may be terminated, where this conflicts with your contractual obligations.

## 7. How can you exercise your rights?

You will not have to pay a fee to exercise any of your rights. If you want to access your personal information, rectify, erase, transfer, restrict or object to processing of your personal data, you may send your request by mail or email to the appointed Data Protection Officer (DPO).

Upon receipt, the Company will take all necessary and reasonable measures to meet your requests within thirty (30) days, and if this is not feasible, you will be informed of the extent necessary and to the extent permitted by applicable legislation, which may not exceed the sixty (60) days.

The Company, acting as the Data Processor of your personal data, is obliged to notify the Supervisory Authority without undue delay, and at the latest within 72 hours, if a data breach occurs, and it is likely that the breach poses a risk to the individual's rights and freedoms.

**8. Where is your personal data transmitted?**

- Your personal data is shared with Accredited Insurance (Europe) Limited, in the context of the special and claims representation by Aegean Insurance S.A. in Greece, for the above stated purposes.
- Your personal data is shared with all Company's departments (i.e. Underwriting, Accounting, Claims, Legal and Technical) as part of risk assessment and regular reporting activities on company performance.
- Your personal data may be disclosed with third parties, non-legal and/or legal entities (i.e. experts, investigators, road assistance affiliates, car and glass breakage repair shops, hospitals or medical diagnostic centers, postage services, call centers, file digitization and scanning services, doctors, lawyers and/or other consultants of any nature).

In such case, your personal data passed to third parties will be processed as part of the Company's regular activities on company performance.

All third-party service providers act as data processors and are required to take appropriate security measures and operate on behalf of the Data Controller.

- Your personal data will be shared with the Hellenic Information Center.
- Your personal data may be passed to other insurers and reinsurers on any legitimate interest.
- Your personal data will be shared with the Statistical Service of the Association of Greek Insurance Companies (Y.S.A.E.), for the purposes of detailed statistical monitoring of the motor insurance industry, facilitating risk assessment by insurance undertakings, preventing and combating insurance fraud and serving the operation and implementation of the Amicable Settlement Agreement.
- Your personal data may be pass to any Supervisory/Regulatory Authority.
- Your personal data may be shared, in any case of need to comply with any legal and mandatory obligation (i.e. lawyers, bailiffs, judicial and prosecuting authorities, public prosecutors, public (government) services and officials or other Supervisory/Regulatory Authority).

**9. Shall your personal information be processed for commercial/marketing purposes?**

The Company shall not process your personal data for commercial and/or marketing purposes. In any other case, of using your personal information for marketing purposes, Aegean will get your express opt-in consent, the event of such processing, you will be informed and asked for your written consent, retaining always the right to oppose to this processing.

**10. How is your personal information kept secure?**

The Company has put in place appropriate security measures (Personal Data Protection Procedures and Policies) and technical measures (Access Control System, Information Security Management System/Technology Protection Measures, Document Shredders) to ensure security of your personal data. This processing is always carried out in accordance with the applicable European Laws on Data Privacy.

**11. How shall you make a request and/or complaint about this?**

You have the right to make a complaint at any time, including any requests to exercise your legal rights, to the appointed **Data Protection Officer**.

**Contact Details:**

**Telephone:** +30 216 4004 132

**e-mail:** [dpo@aegeaninsurance.gr](mailto:dpo@aegeaninsurance.gr)

If you are not satisfied with our response, you have the right to complain to the applicable Supervisory Authority, [www.dpa.gr](http://www.dpa.gr).

**Please find below, the consent form for processing your personal information required for issuance and validation of your insurance policy:**

<b>CONSENT FOR PROCESSING PERSONAL DATA</b>	
I, the insured, declare that:	
<ul style="list-style-type: none"> <li>• I have been informed of the processing of my personal information by <b>Aegean Insurance S.A.</b></li> <li>• I have been informed of my rights and the personal information that is retained.</li> </ul>	
<ul style="list-style-type: none"> <li>• I expressly give my consent to the Company to process the following:               <ol style="list-style-type: none"> <li>1. All personal information required for the proposal and issuance of the insurance policy and any additional data included special category data passed to the Company, related to the insurance policy and any contractual agreement on the part of Aegean, in its normal course of business.</li> <li>2. All personal information and retain in electronic and/or other means.</li> </ol> </li> </ul>	
<ul style="list-style-type: none"> <li>• I am aware for the purpose of processing my personal data and the significance and the envisaged consequences of not giving my consent, resulting to termination of the insurance policy.</li> </ul>	
Date	The declarant (Full Name & Signature)
___/___/___	_____