



# INFORMATION MEMORANDUM PERSONAL DATA PROCESSING RELATED TO THE INSURANCE POLICY

Proper processing of your personal data is very important to us and their protection is natural for us. Thus, we would like to give you detailed information about why we process your personal data, which are purposes for your personal data processing, which rights you have in connection with their processing, as well as other information that may be important to you regarding the processing of your personal data.

We would like to assure you that in AXA Assistance we adhere to strict rules that define which employee or department has access to your personal data and which personal data can be processed. Please read below the information we have written about our personal data processing so that this document is as clear and practical as possible for you.

## INFORMATION ON PROCESSING OF YOUR PERSONAL DATA

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## 1. PERSONAL DATA CONTROLLER

The personal data controller is the company, which determines the purposes and means of the processing of your personal data. Typically, it is the company, to which you provide your personal data. In this situation, INTER PARTNER ASSISTANCE S.A., with registered office in Brussels, operating in Poland through Inter Partner Assistance S.A. Branch in Poland with registered office in Warsaw, ul. Prosta 68; 00 – 838 Warszawa member of AXA group, is, as the insurance company, the controller of your personal data.

## 2. DATA PROTECTION OFFICER

AXA Assistance also has Data Protection Officer (DPO), who oversees the proper processing of personal data for the controller.

Please find all the necessary templates for your possible inquiries or requests on our web page, specially dedicated to personal data protection [www.axaassistance.pl/iodo](http://www.axaassistance.pl/iodo)

You can contact us via different means according to your preferences and possibilities:

- via e-mail: [iodo@axa-assistance.pl](mailto:iodo@axa-assistance.pl)
- contact form under [www.axa-assistance.pl](http://www.axa-assistance.pl)

You may contact the Data Protection Officer with any queries relating to the processing of your data by us, and to exercise your data protection rights described below.

### 3. PURPOSE OF PERSONAL DATA PROCESSING

In connection with your policy, your data may be processed for the purposes of:

- conclusion and performance of the insurance policy, including insurance risk assessment – the legal basis for processing is the necessity of processing data for the conclusion and performance of the insurance policy;
- insurance risk assessment in an automated way as part of profiling before the conclusion of the insurance policy – the legal basis for processing is a fulfilling the legal obligation of the controller;
- fulfilling the controller's obligations related to reporting duties, the legal basis for this processing are legal obligation that arise from different law in force that we are obliged to follow;
- sanction list checks and CRS – the legal basis for data processing is necessary to complete the legal obligation imposed on the controller as a result of the legal regulations e.g. on compliance with international tax obligations and sanctions and anti-money laundering legislation, and regulations on the automatic exchange of tax information with other countries;
- pursuing claims related to your insurance policy – the legal basis for data processing is insurance policy performance as well as fulfilling the rights and duties and other legal obligations of the controller;
- during the claims handling process we may verify your health conditions – the legal basis for this processing are insurance policy performance, fulfilling our legal obligations and if required by legislation, consent, that you might give to us;
- fraud investigation and detection, including counteracting insurance crimes – the legal basis for data processing is indispensable processing for the legitimate interest of the controller; the legitimate interest of the controller is to reduce losses arising from the criminal activities of individuals;
- reinsurance of risks – the legal basis for data processing is the necessity of processing to implement the legitimate interest of the controller; legitimate interest of the controller is to reduce the insurance risk associated with the reinsurance contract concluded between the insurance company and the reinsurance company;
- deposition of documentation during their retention period – the legal basis for data processing is our legal obligation and legitimate interest; the legitimate interest of the controller is to keep the documents during the limitation periods in order to be able to prove certain facts e.g. in case of possible litigation;
- statistical purposes – the legal basis for this processing are fulfilling the legal obligation and legitimate interests of the controller; the legitimate interest of the controller is to evaluate the risk and profitability parameters of the insurance portfolio and to reduce its risks as well as to evaluate the efficiency of distribution channels and optimize sales strategy.

Should the special categories of your personal data be processed (usually data concerning health condition), their amount and scope will be always the least possible for fulfilling a particular purpose and based on the legal title as the following:

- processing is necessary for determining or fulfilling insurance claims, in particular claims for insurance benefits;
- processing is necessary for statistical purposes;
- processing is necessary to protect the vital interests of the data subject;
- consent, that you might give to us.

### 4. PERSONAL DATA CATEGORIES

The following section describes the specific personal data, including examples. We only collect and store your personal data that are necessary for a particular purpose:

- **Basic identification data**  
Your personal data such as the first name and surname, date of birth and identification number. When dealing with a businessperson we collect the trade name, company ID and registered office (seat) address.
- **Contact data**  
The postal (mailing) address, telephone number and/or electronic mail address are necessary for us to deliver communications to you.
- **Information concerning your policy**  
We keep the information about the chosen product and its content or about all supplementary insurance, the estimation of age, the target destination and duration of the insurance policy.
- **Information concerning claims**  
We process information about the insurance event and the results of its investigation of insured events, data of people involved in the event, witnesses, police protocols and information contained in them, geolocation data regarding the place where the loss event occurred, etc.
- **Other personal data you may supply us during the insurance**  
These may be data provided during the conclusion of the insurance policy, claims handling of your insurance event, data from telephone call records or other interactions between you and us, and other data we process to fulfil our legal obligations or to our legitimate interests

### 5. RECIPIENTS

The protection and proper processing of your personal data is a legal obligation for the controller of your personal data. The same requirements are applied to joint controllers of your personal data. Controller or joint controllers can use other subject, so called processor, which on the basis of public authority, agency or other body, processes personal data on behalf of the controller.

In such cases, the protection of your personal data is guaranteed, both contractually and in terms of regulatory law, to the same extent as if the data were processed by AXA Assistance. Processors process your personal data under a special agreement on the processing of personal data that we have concluded and according to our instructions.

Your personal data may be transferred to:

- insurance and reinsurance companies,
- entities that process personal data on our request, among others IT service providers, entities that process data for the purpose collection of receivables or insurance agents,
- providers of services to settle claims and provide a service depending on your insurance.

The main recipients of your data by categories are:

- **Services providers, in particular assistance and claims handling services**
  - AXA ASSISTANCE CZ, s.r.o.; ID: 25695215
  - MediSky International spółka z ograniczoną odpowiedzialnością, ID: 0000628122
  - Inter Partner Assistance Polska SA
- **IT providers**
  - AXA Technology Services SAS, Francie; RCS Nanterre 399 214 287
  - STRATOS.INF.CZ s.r.o.; ID: 28250222
  - STRATOS Informatic spol. s r.o.; ID: 14888840
  - Sprinx systems a.s.; ID: 26770211
  - PayU S.A., Polsko; NIP: 779-23-08-495

We may share some of your personal data with other companies within the worldwide AXA Group who assist us with certain services, including claims handling 24 hours per day, 7 days per week or with call recordings and sanctions checking. These group entities will act on our behalf, and we remain responsible for how they use your personal data for these purposes.

We may also share your details with other companies within the worldwide AXA Group for the purposes of claims cost management, product improvement, personalization of product offerings and for the prevention and detection of fraud. We may also use the data for statistical purposes.

Those companies will not be able to identify any individual data subject from the information we provide them, not even you. We may also disclose your personal data to the following parties:

- legal authorities or regulatory bodies,
- parties involved with current or prospective legal proceedings, or assisting us to establish, exercise or defend our legal rights. For example, we may share information with our legal or other professional advisers,
- other companies from the AXA Group to the extent that you have consented to us doing so, or where we are otherwise required or permitted to do so by law.

## 6. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY

Your data may be transferred to a third country in a case where this is necessary to carry out the insurance benefit under the insurance policy you entered to (especially travel insurance).

When a transfer out of the European Economic Area and Switzerland is involved, we will ensure appropriate measures are put in place to safeguard your data.

In cases where we could be led to transfer your data to a location outside the European Economic Area, we will ensure your data is given a similar level of protection to that required by GDPR and Polish data protection law.

Transfer of personal data in such cases shall be based on:

- binding corporate rules,
- standard data protection clauses adopted by the European Commission,
- standard contractual clauses accepted by the supervisory body,
- approved code of conduct,
- approved certification mechanism,
- adequacy decision (countries with the adequate level of personal data protection).

We can also transfer your personal data in specific situation allowed by law such as the transfer is necessary for the performance of insurance policy and when the transfer is necessary in order to protect your vital interests or vital interest of insured persons, especially in travel insurance when we act to protect health or life of the insureds.

## 7. STORAGE PERIOD

Your personal data will be stored until lapsing the time for claims from insurance policy or until the obligation to store data resulting from the law – expires, in particular the obligation to store accounting documents and international tax regulations.

Your personal data provided under the insurance will be stored for 6 years after the termination of such insurance.

The retention period of the claims cases is defined as the result of various criteria based on what the claim includes (e.g. a liability risk, or events like annuity, regress or litigation happened on a particular claim). The retention period set as mentioned above is additionally increased by a limitation period. This means that retention periods are set differently for individual claims cases.

The retention period of the other documentation is defined based on the respective law requirements, including limitation period, in particular e.g. tax and accounting law.

When we handle the personal data, we apply the principle of minimization, which means that at the time when we have the obligation to delete your personal data, your personal data are deleted or anonymized from our databases and information systems. Within AXA Assistance, we have strict internal privacy rules that ensure that we do not keep the data for longer than we are authorized or required.

## 8. RIGHTS OF DATA SUBJECT

You are entitled to demand from us access to your personal data, to amend it, to erase it, or to limit its processing and transfer.

In the case where your data are processed on the basis of your consent granted – you are entitled to withdraw it at any time your consent for the processing of data in that scope for which the consent had been given, without affecting the lawfulness of processing based on consent before its withdrawal.

Irrespective of the rights referred to above, you are entitled to object to the processing of your personal data:

- for the purposes of direct marketing;
- where the processing is necessary to perform a task fulfilled in the public interest, or as part of exercising public authority entrusted to the data controller;
- where the processing is necessary for purposes stemming from legally justified interests being carried out by the data controller or a third party. You are entitled to lodge a complaint with a supervisory authority – the Inspector General for the Protection of Personal Data.

Please find all the necessary templates for your possible inquiries or requests on our web page, specially dedicated to personal data protection [www.axa-assistance.pl/iodo](http://www.axa-assistance.pl/iodo).

## 9. PROVISION OF PERSONAL DATA

Providing personal data in connection with the concluded insurance policy is not obligatory but is necessary to conclude and performance of the insurance policy and to assess the insurance risk – without providing personal data is not possible to conclude an insurance policy.

## 10. AUTOMATED DECISION-MAKING

The information that you stated during the conclusion of the insurance policy shall be subject to automated processing in the AXA Assistance systems, for the purpose of assessment of insurance risk.

You have the right to object to such automated processing. However, if you do so, you will not be able to negotiate the insurance and such an objection will be considered as a withdrawal of your application for insurance policy conclusion. In addition, we will apply analysis and profiling with aim to customize the offer of our services to your needs in case we process your data for the direct marketing purposes.

## 11. SOURCES OF PERSONAL DATA

During the claims handlings procedures, personal data may be obtained from the various sources, as other insurance companies, police, witnesses, Guarantee Insurance Fund (Ubezpieczeniowy Fundusz Gwarancyjny), etc.

During the fraud prevention procedures, personal data may be obtained from various sources. Disclosing these sources would involve a disproportionate effort and is likely to render impossible or seriously impair the achievement of the objectives of that processing.