

LEGAL NOTICE CONCERNING THE PROTECTION OF PERSONAL DATA

Zavarovalnica Sava, zavarovalna družba, d.d. in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR), has adopted **Privacy policy**, which provides all information on the processing of personal data of natural persons. The full document is available on the insurance company's website <https://www.zav-sava.si/sl-si/pravna-obvestila/>, and a summary of the content of the policy is provided below in this notice, submitted upon first contact with you.

1. Controller of the personal data with the data protection officer:

Controlled by: ZAVAROVALNICA SAVA, zavarovalna družba, d.d., Cankarjeva ulica 3, Maribor

Contact information:

- Free phone number: 08 19 20
- Main phone number: 02 23 32 100
- <https://www.zav-sava.si/sl-si/pravna-obvestila/>
- e-mail address: info@zav-sava.si

Data Protection Officer (DPO):

Individuals to whom personal data relate may contact the Data Protection Officer on all issues related to the processing of their personal data and the exercise of their rights under the applicable regulations governing the protection of personal data. Contact information:

- Free phone number: 08 19 20
- e-mail address: info@zav-sava.si

2. Purposes and legal bases of the processing of personal data

a) concluding and executing insurance contracts: Zavarovalnica Sava processes personal data of insurers and insured parties within the framework and for the purpose of performing contracts, also for the purpose of concluding contracts, in the negotiation phase, after receiving an offer or request from an individual. The pre-contractual phase also includes automated decision-making on the basis of profiles, which is intended to assess an individual's credit rating or his suitability for inclusion in insurance from the point of view of the probability of realization of insurance risks. Such an assessment is necessary at this stage, and in the event that the individual is not satisfied with the decision taken in an automated manner (e.g. when the insurance company refuses to conclude the contract or offers different conditions), they may submit an oral or written request for clarification to an insurance agent or a written request for clarification by e-mail to: info@zav-sava.si. In this case, the authorized body or professional service of the insurance company shall consider the arguments of the individual and make the final decision on concluding a contract with him.

b) legal basis: Zavarovalnica Sava processes personal data of individuals also on the basis of:

- Insurance Act (ZZavar-1), also for the purpose of recovery of outstanding liabilities under insurance contracts, enforcement of claims as well as other rights and obligations, including the investigation of suspicious cases of unduly paid compensations or insurance benefits;
- The Prevention of Money Laundering and Terrorist Financing Act (ZPPDFT-1) for the purpose of providing personal data of individuals who fall under the obligation to report to the Office of the Republic of Slovenia for Money Laundering Prevention and Terrorist Financing;
- international treaties, such as implementation of the FATCA agreement (Foreign Account Tax Compliance Act) and the Common Reporting Standard (CRS) for the automatic exchange of information regarding financial accounts in tax matters, for the purpose of the transfer of personal data of taxpayers to the Financial Administration of the Republic of Slovenia;
- other EU regulations and national legislation, which in certain cases require Zavarovalnica Sava to provide personal data of individuals to state bodies and other controllers in order to fulfil their legal obligations or competencies.

c) statement of consent: in certain cases, Zavarovalnica Sava asks its policyholders and other individuals to give their consent to the processing of their personal data for the purpose of direct marketing, including the notification of customized offers. In these cases, the processing of personal data takes place in the context of the individual's permitted scope of personal data, purpose and agreed channels of communication, until such consent is revoked. Only a person over the age of 15 can give valid consent to the processing of personal data, otherwise their parents or guardians must consent to the processing of the child's personal data.

d) legitimate interest: the legitimate interest of the insurance company as a processor of personal data represents the legal basis for processing, if it does not prevail over the interests and fundamental rights and freedoms of the data subject. On the basis of a careful assessment, the insurance company takes into account the individual's reasonable expectations regarding the processing of personal data, especially with regard to his relationship with the insurance company (e.g. preparing the insurance agent for a sales interview and reviewing previously concluded insurances). On the basis of a legitimate interest, Zavarovalnica Sava processes personal data of certain categories of individuals, e.g. for the purpose of:

- detection and prevention of fraud and other irregular activities;
- technical maintenance of websites and services as well as ensuring the operation of information systems, network security and information;
- performing analyses of personal data for business risk management and actuarial compliance;
- statistical processing intended for the preparation of reports to the company's management;
- preparation of offers with prior profiling and use of a narrow set of personal data that are not specific types of personal data;
- customer opinion survey and monitoring their satisfaction;
- customer relationship management;
- informing clients about the possibility of renewal or continuation of individual insurances;
- implementation of video surveillance at individual locations of the company;
- enforcement and recovery of outstanding claims.

e) processing of cookies: for the purposes of monitoring, analysing, maintaining, developing and improving the functionality of the website and marketing, the server automatically collects the following data: IP address; URL address of the website through which you came to our website; basic parameters of the browser, operating system and device; the address visited on our websites; date and time of a visit to the website. For these purposes, Zavarovalnica Sava uses cookies on its website. Cookies are user data that a web browser stores on a computer or other electronic device for further use. This is information that is stored on an individual's computer when visiting a particular website and is used to enhance your user experience and improve the functioning when visiting the same page again; however, it is not possible to identify a specific individual. Cookies can be stored, restricted or disabled by each user. You can learn more about cookies at: <https://www.zav-sava.si/sl-si/pravna-obvestila/piskotki/>.

3. Users of personal data and possible transfer to third countries

In addition to Zavarovalnica Sava (its employees), personal data is processed by our processors, such as insurance agencies and insurance intermediaries, companies that provide technical support to the insurance company in the processing of personal data (e.g. application developers, call centres) and processors hired by the insurance company to provide the services needed to perform insurance contracts (e.g. vehicle services). In some places, we act as joint controllers of personal data (e.g. in some health insurances) with our contractual partners in accordance with the provisions of the GDPR, as together we determine the purposes and conditions of the processing of your personal data.

In individual cases, the insurance company is also obliged to provide personal data to certain external users who demonstrate an appropriate legal basis for this (e.g. national authorities who need your personal data in the context of formal procedures).

In the processing of personal data, Zavarovalnica Sava may also entrust individual activities to processors and controllers outside the territory of the Member States of the European Union and the European Economic Area (EEA) for the purposes of fulfilling obligations under concluded insurance contracts, guaranteeing that the same level of protection of personal data will be ensured, as if the processing was carried out by itself, and all the requirements of the regulations relating to the transfer of personal data to third countries will be respected.

4. Individual rights

If you have any questions regarding this policy or the processing of your personal data, please contact us by writing to us at: Zavarovalnica Sava d.d., Cankarjeva ulica 3, 2000 Maribor (mention the reference "for DPO") or by e-mail: gdpr@zav-sava.si, or do so by phone at 080 19 20. Upon your request, we will notify you in writing and in accordance with regulations.

In order to ensure fair and transparent processing of personal data, the individual whose personal data are processed may, under additional legal conditions:

- request access to their personal data and obtain information,
- be able to have inaccurate personal data rectified, or completed if it is incomplete,
- request blocking or restricting the processing or deletion of personal data ("right to be forgotten"),
- oppose the processing of data relating to them; and
- require the transmission of the data.

An individual can withdraw consent for the processing of their personal data (for one or more specific purposes) by written request at any time permanently or temporarily, in whole or in part. Similarly, they can express their will concerning the channels through which the notification takes place. Withdrawal of consent shall not affect the lawfulness of the processing carried out on the basis of the consent until its withdrawal.

An individual also has the right to lodge a complaint with the Information Commissioner of the Republic of Slovenia if they consider that their personal data are stored or otherwise processed in contravention of applicable regulations governing the protection of personal data.

5. Retention of personal data

Zavarovalnica Sava shall process personal data only to the extent necessary to achieve the purposes of processing and as long as this is necessary to attain the objective pursued, and if obtained on the basis of consent, for the purpose for which consent was given, only until revoked.

Zavarovalnica Sava keeps personal data processed on the basis of applicable legislation for another ten years from the expiry of the last insured policy taken out or the completion of the processing of the last insurance case. The same applies to the processing of this data in companies to which personal data have been transferred for the same purpose. Other personal data shall be kept until the fulfilment of the purpose for which they were collected or within the limitation periods for obligations that could arise from the processing of such personal data.