

## PRIVACY NOTICE

**Allianz Hrvatska d.d.**, Heinzelova 70, Zagreb, PIN: 23759810849, member of Allianz Group, is an accredited Croatian insurance company licenced to conclude and perform life and non-life insurance contracts, pursuant to a decision of the Croatian Financial Services Supervisory Agency (HANFA). In performing its activities, Allianz Hrvatska d.d. collects and processes personal data of beneficiaries of its services, thereby observing all applicable laws and regulations and taking into account the accuracy, integrity and security of this data. The insurance business is a business of significant public interest.

**Protecting your security is our priority. Please read this information carefully!**

### 1. Who is the personal data controller?

**Allianz Hrvatska d.d.** is the data controller of your personal data as stipulated by law and personal data protection regulations. As the personal data controller, Allianz Hrvatska d.d. determines the purposes and means of personal data processing and is responsible for storing and using personal data in paper or electronic form.

Contact details of the data controller:

- Allianz Hrvatska d.d., Contact Centre, Heinzelova 70, Zagreb
- phone number: 072 100 001
- e-mail: [osiguranje@allianz.hr](mailto:osiguranje@allianz.hr)

### Personal Data Protection Officer

Pursuant to relevant regulations, Allianz Hrvatska d.d. designated a Personal Data Protection Officer, whom you may contact in case you have any questions concerning the processing of your personal data or the exercise of your personal data protection rights.

Contact details of the data protection officer

- Allianz Hrvatska d.d., Heinzelova 70, Zagreb
- e-mail: [dpo@allianz.hr](mailto:dpo@allianz.hr)

### 2. What types of personal data do we collect?

The personal data we collect depend on the type of insurance contract you are concluding, intend to conclude or on the request for the exercise of insurance rights. First and foremost, this entails data that we absolutely require in order to conclude an insurance contract with you, and include at least your personal data (name and surname, address, contact details, PIN, date of birth, sex and an identification document, if necessary).

We also need some data so that we could communicate with you more easily and on time during our business relationship and forward you essential or interesting information relating to that relationship or to your rights and/or obligations arising out of that relationship (phone number; e-mail address etc.). We will request certain data in order to meet our commitments pursuant to the insurance contract, others in order to meet our legal commitments, while some data will be requested by virtue of our legitimate interest.

Depending on the reason why we require them, the types of personal data we collect are the following:

- basic personal data
- education and work experience data
- data on planned journeys and travel expenses
- data related to family, social status and lifestyle
- data regarding your workplace and related to work
- data related to health and workplace absences
- financial data
- identity checks and in-depth analyses
- data on the property being insured
- other data and public documents.

### 3. How will we collect and use your personal data?

Personal data is primarily collected directly from you, during contract negotiations or upon concluding the contract, claim damages or complaints. We consider that we receive information directly from you when you submit it through your proxy, such as lawyer or insurance broker. We may also collect your data when you during registration or activation of some of our online services, mobile services and/or applications (e.g. mDoktor). If you are not our contractor or direct customer of our services, we may also obtain data about you from the policyholder. Your data may also be collected from publicly available sources and documents from third parties such as our business partners, insurance distributors, government bodies, other insurance companies and associations, assessors, attorneys or financial institutions

The purpose of collecting personal data is explained below.

### 4. Why do we require your personal data?

As an insurance company, we collect personal data primarily for the purpose of concluding and performing insurance contracts, pursuant to the acts that regulate the insurance business and relations under civil law. Besides this, we collect them in order to meet our legal commitments and/or on the basis of our legitimate interest, while, in case of specific purposes, we will additionally seek your explicit consent.

We collect personal data for the purpose of concluding an insurance contract from you as the policy holder as early as the negotiations stage in order to assess your needs and demands or to determine whether specific products are appropriate or suitable for you, taking into account the specific circumstances of your situation. During the contractual relationship, we collect personal data to execute the rights and obligations arising from the insurance contract, whether you are the policy holder, insured party, beneficiary or damaged third party.

It is your duty to provide us with accurate and true data we need for the purpose of concluding the contract and that are relevant for risk assessment, while it is our obligation to take further care regarding their accuracy and collect only the amount of data that is actually required for the purpose of processing.

The personal data we collect and process for the purpose of **concluding and performing insurance contracts** are used for the following purposes:

- making informative calculations of the insurance premium;
- verifying your needs and demands before concluding an insurance contract or verifying whether investment insurance products are appropriate or suitable for you, in accordance with the regulations on insurance distribution;
- processing the offer in terms of assessing the acceptability of the risk we will be adopting through the insurance (underwriting), the conditions thereof and determining the insurance premium amount;
- assessing whether the insurance contract can be amended during the contractual relationship and under what conditions;
- resolving a claim for damage or exercising our rights from the insurance contract, including recovering the recourse, debts or the insurance premium;
- administration concerning the insurance contract and ensuring that your data are accurate and up-to-date.

We perform our insurance business in accordance with principles and regulations on good professional practice. For this reason, we collect and process some data in order to **meet our legal obligations**, *inter alia*.

- obligations pursuant to the Accountancy Act, the Revenue, Income Tax and Surtax Report, the Act on the Prevention of Money Laundering and Terrorist Financing, the Foreign Account Tax Compliance Act and the Common Reporting Standard for obligatory automatic exchange of information on financial accounts, the obligations to follow international restrictive measures;
- resolving complaints and objections related to concluding and performing insurance contracts and
- the obligation to distribute risks through re-insurance and co-insurance or other legal commitments.

If you withdraw any of data that we require for concluding or performing an insurance contract or meeting our legal obligations, we will be unable to meet our legal or contractual obligations or conclude a contract with you.

We consider some types of personal data processing our **legitimate interest**. However, such processing is subject to special rules that enable you to object to the processing or profiling based on it at any moment. In such a case, we will no longer process your data on the basis of legitimate interest, unless we can prove that there are compelling and legitimate reasons for processing that go beyond your interests, rights and freedoms. We consider the following to be our legitimate interest:

- contacting you via e-mail and/or mobile phone to communicate with you in easiest and most simple way facts and information that are relevant for our business relationship and/or information that may influence your rights and/or obligations arising out of that relationship (e.g. existence of debt or overpayment.);
- promotion of insurance products we offer at the market and benefits from the existing insurance contracts; surveying the satisfaction with the service provided and
- preventing and discovering misappropriation or insurance fraud.

**Pursuant to the Insurance Act, we will acknowledge the legitimate interest of third parties** when exchanging data with other insurance companies for the purpose of discovering or preventing misappropriation or insurance fraud.

### Consent

We will request your consent for some types of personal data processing. In such a case, we will notify you in advance of the reasons for such processing and request your consent.

For instance, we will require your **consent** in the following cases:

- for marketing purposes, when you are not our client or are no longer our client, in order to stay in touch and occasionally keep you informed about our offers, products and services that you want or would match your requirements and needs.

You can withdraw your consent at any moment and we will stop such processing immediately. However consent withdrawal does not affect the legality of processing prior to the withdrawal.

You can withdraw your consent by contacting us on phone number 072 100 001; via web portal [moj.allianz.hr](http://moj.allianz.hr); in any of our offices or by sending completed form that you can find at [www.allianz.hr](http://www.allianz.hr) via e-mail address: [osiguranje@allianz.hr](mailto:osiguranje@allianz.hr).

### 5. Automated processing of personal data, including profiling

If we intend to calculate the amount of your insurance premium by means of **automated processing of your personal data**, the insurance distributor will notify you of this when concluding the insurance contract and enable you to express your viewpoint on such a decision or object to it.

Automated data processing is used when we estimate the amount of risk of an insured case arising based on your personal data, for instance the location of your property, and determine your insurance premium in this manner. This might put you in a position to obtain a more favourable insurance offer or familiarise yourself with the facts that point to the existence of additional risks on your side that affect the premium amount.

We also use automated data processing with online insurance contracting – web shop. There you will also be able to obtain information on how personal data you entered affect the premium calculation.

In any case, we will explain the logic behind automated processing, and if you wish so, you will be able to talk to some of our employees.

### 6. Who will have access to your personal data?

We make sure that your data is processed solely in the manner that is in accordance with the purpose for which they were collected as described in Section 4 above. If this is necessary for the purpose concerned, the following persons will have access to your data:

- insurance distributors;
- re-insurance and co-insurance providers for the purpose of assuming excess risk;
- other companies members of Allianz Group;
- other insurance companies for the purpose of preventing fraud or meeting commitments pursuant to international agreements and conventions;
- government authorities in accordance with the legal commitments of Allianz Hrvatska d.d. (the Croatian Financial Services Supervisory Agency – HANFA, the ombudsperson competent for insurance, the Croatian Insurance

Bureau, the Ministry of Finance of the Republic of Croatia, the Tax Authority, Croatian Bureau of Statistics, judicial and other government authorities) or audit companies;

- financial institutions (banks, leasing companies) and payment institutions;
- companies providing IT solutions, assistance services, damage claim processing services;
- healthcare institutions;
- lawyers, technical consultants and experts, such as medical court experts, assessors, servicers;
- companies providing printing, delivery or storage services or destruction of business documents;
- market research agencies, marketing and other business partners.

Data processors that process personal data on behalf of Allianz, shall process personal data exclusively in compliance with the instructions provided by Allianz Hrvatska d.d. and the contract concluded with us.

## 7. Where will my data be processed?

Your personal data may be processed within or outside the European Economic Area (EEA) by the data processor as listed in Section 6 above, whose responsibility and obligation is to protect the personal data and guard their confidentiality as defined in the contractual relationship and in accordance with all technical and organisational protection measures and legal acts regulating data protection.

Your personal data will not be accessible to anyone not authorised by Allianz Hrvatska d.d.

Every transfer of your personal data outside the EEA for the purpose of processing by a member company of Allianz Group will be conducted in accordance with the adopted Allianz Binding Corporate Rules (**Allianz BCR**), which establish proper protection of personal data and which are legally binding for all member companies of Allianz Group.

Allianz BCR and the list of all companies within the Allianz Group compliant with and bound by Allianz BCR are available at [https://www.allianz.hr/hr\\_HR/privatni-korisnici/o-nama/zastita-prava.html#potpisnici-allianz-korporativnih-pravila](https://www.allianz.hr/hr_HR/privatni-korisnici/o-nama/zastita-prava.html#potpisnici-allianz-korporativnih-pravila). You can object to the processing and transfer of personal data pursuant to Allianz BCR by sending an e-mail complaint to [privacy@allianz.com](mailto:privacy@allianz.com).

When Allianz Binding Corporate Rules are not applicable to the transfer of data, we will take all personal data protection measures when transferring data outside the European Economic Area, just like we do within the EEA. You can find out more about the protection measures we apply (e.g. standard contractual clauses) by contacting us as described in Section 12 below.

## 8. What are my rights in relation to my personal data?

When provided for in the regulations, you are entitled to the following:

- **the right of access** to the personal data concerning you, the information on the origin of personal data, reasons for processing, information on the data controller, data processor and recipients to which your data was revealed or will be revealed;
- **the right to withdraw your consent** at any moment, if your data is processed with your consent;
- **the right to amend or complement** your personal data in order to maintain their accuracy at all times;
- **the right to delete** your personal data when they are no longer required for the purposes referred to above;
- **the right to restrict the processing** of personal data under certain circumstances, for instance, when you object to the accuracy of personal data, until we verify their accuracy;
- **the right to remove** your personal data in a structured form and transfer them to another insurance provider;
- **the right to object to automated processing** of personal data so that a decision that has been reached exclusively by automated processing does not apply to you and
- **the right to lodge a complaint to Allianz Hrvatska d.d. or a competent government authority.**

You can exercise your rights by means of a form available at [https://www.allianz.hr/hr\\_HR/privatni-korisnici/stete-i-info/pronadite-dokument.html#dokumenti-obrosci](https://www.allianz.hr/hr_HR/privatni-korisnici/stete-i-info/pronadite-dokument.html#dokumenti-obrosci) or as described in Section 12 below.

When communicating with you and dealing with your request, we will undertake every reasonable effort to verify your identity and prevent unauthorised disclosure of personal data.

## 9. How can I object to the processing of my personal data?

Under certain conditions, when legally possible, you have the right to object to the processing of personal data or request that the processing be discontinued, for instance when the purpose of processing is our legitimate interest or direct marketing. As soon as we receive your request for discontinuing the processing, we will stop processing your personal data, unless the processing is permitted pursuant to the relevant legal and other acts. You can exercise this right as described in Section 12 below.

#### **10. Right to appeal to a competent authority**

You can lodge an appeal against the processing of your personal data also to the Croatian Personal Data Protection Agency, Selska cesta 13, Zagreb, 00385 (0)1 4609 000, [azop@azop.hr](mailto:azop@azop.hr), [www.azop.hr](http://www.azop.hr), as the competent authority or to another European Supervisory Authority competent for protection of personal data.

#### **11. For how long will we keep your personal data?**

Your data will be kept for as long as is necessary in order to achieve the purpose for which they were collected. The criterion based on which we determine the period for which your data will be kept is the purpose of collecting, duration of the insurance contract, statute of limitation for claims as prescribed by law or a specific provision of another act that obliges us to keep certain data for a particular time period. Periods for keeping personal data are specified in more detail in our internal acts.

#### **12. How can you get in touch with us?**

In case you have any questions regarding the use of your personal data, you can contact us by phone, e-mail or post in the following manner:

- phone number 072 100 001
- e-mail: [dpo@allianz.hr](mailto:dpo@allianz.hr), [osiguranje@allianz.hr](mailto:osiguranje@allianz.hr)
- in writing to the address: Allianz Hrvatska d.d., Contact Centre, Heinzelova 70, Zagreb
- through forms available at: [https://www.allianz.hr/hr\\_HR/privatni-korisnici/stete-i-info/pronadite-dokument.html#dokumenti-obraci](https://www.allianz.hr/hr_HR/privatni-korisnici/stete-i-info/pronadite-dokument.html#dokumenti-obraci)

#### **13. How often do we update this Information on the Use of Personal Data?**

The Information on Data Processing is updated regularly, and the latest version is always available at our website [https://www.allianz.hr/hr\\_HR/privatni-korisnici/stete-i-info/pronadite-dokument.html#dokumenti-ostalo-ioop](https://www.allianz.hr/hr_HR/privatni-korisnici/stete-i-info/pronadite-dokument.html#dokumenti-ostalo-ioop). In case significant changes that affect you occur, you will be notified directly.

This information was last updated on: 1<sup>st</sup> of July 2021