PROTECTION OF YOUR PERSONAL DATA

The principles and standards of personal data protection described in this document pertain to the products and services of the CROATIA osiguranje d.d. and LAQO brands.

We, CROATIA osiguranje d.d., Vatroslava Jagića 33, Zagreb, are the controller in the process of personal data processing. This means we protect your personal data and your privacy. We collect and process data lawfully and transparently, solely for the purposes for which such data are necessary. We always ensure that your data are secure, accurate, complete and up to date.

01. WE PROCESS DATA FOR SEVERAL REASONS

1.1. Why do we process your personal data?

Taking steps at the Policyholder's request prior to contract conclusion (Article 6(1)(b) of the General Data Protection Regulation).

Your data allow us to perform a risk assessment, define the terms and conditions of insurance and the insurance premium, and prepare an indicative calculation or insurance proposal.

Exercise of our mutual rights and performance of our mutual obligations under the contract (Article 6(1)(b) of the General Data Protection Regulation).

In order to be able to perform such obligations and exercise such rights, we need your data for:

- **administration of the insurance contract and processing of insurance documents;**
- **granting loans and collecting loan repayment amounts based on life insurance policies;**
- **collection of due insurance premium and other receivables;**
- **keeping accounts of collected premiums and losses;**
- **performing activities in connection with accounting and financial reporting, underwriting and reinsurance and coinsurance;**
- **processing and settling insurance claims; and**
- **responding to your questions, complaints, objections or any other requests for the exercise of your rights.**

In the event you decide to register for and take part in our benefits programs, we need to process your data to allow you to participate in such programs. We do this in accordance with the general terms and conditions of the program.

We also process your data if you have submitted a request for:

- **conclusion of contract via our web shop;**
- **registration and login to the customer portal on our website;**
- **registration and login to the Moja Croatia and LAQO mobile apps**
- **After you accept the general terms and conditions of using the portal or apps, you become a party to the contractual arrangement.**

Performance of our obligations in compliance with Croatian and EU regulations (Article 6(1)(c) of the General Data Protection Regulation)

According to the applicable legislation, we are required to take certain steps, such as the evaluation of your requirements and demands prior to the conclusion of an insurance contract, our duty to pay compensation for loss under liability insurance contracts, and performing due diligence investigations in the context of anti-money laundering and terrorist financing.

In addition, according to FATCA and CRS regulations, we need to exchange personal data with institutions responsible for ensuring financial security. We may also collect and process your data as a result of obligations arising under other regulations or international arrangements where these affect contract performance. In short, there are Croatian and EU regulations that we are required to observe, depending on the purpose of data processing.

Performing certain activities necessary to provide credit intermediation services.

Pursuing our legitimate interests or interests of third parties. (Article 6(1)(f) of the General Data Protection Regulation)

We perform a balance assessment (legitimate interest test) for each instance of processing based on our legitimate interest to ensure that our interest do not override your interests, rights and freedoms.

Based on such legitimate interest, we may process your data for the purpose of:

- **preventing and detecting insurance fraud as well as fraud or embezzlement in general;**
- **video surveillance of business facilities and visitor identification for the purpose of protecting persons and property;**
- **recording telephone conversations for the purpose of collecting information necessary for responding to queries, selling our products and arranging services, protecting persons and property and training our staff;**
- **managing our clients' portfolios with certain financial institutions and leasing companies;**
- **establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure;**
- **giving notices of debts and overpaid amounts, enforcement of premium and other debts, and conducting administrative and court proceedings;**
- **activating electronic business communication services (sending business-related documents by e-mail);**
- **conducting internal analyses and business reporting based on specific purposes of the processing;**
- **contacting visitors of our website in order to help them with their remote purchase transactions;**
- **providing information about important facts pertaining to insurance contracts or in order to provide customer support;**
- **conducting direct marketing and market research to:**
  - **notify you, as the Policyholder, based on profiling, of: 1) the fact that your insurance contract is about to expire; and 2) being able to offer you new products;**
  - **contact you, as the Policyholder, for the purposes of conducting customer satisfaction and opinion surveys;**
  - **contact you, as the Policyholder, in connection with a benefits program;**
  - **conduct surveys that serve as bases for profiling policyholders for the purposes of direct marketing, improving marketing communication or personalizing customer support;**
  - **contact former policyholders and other individuals and offer them new products;**
  - **offer you, as a benefits program user, relevant products and services within the framework of a particular loyalty program.**

To be able to contact you, we need your address, phone number and e-mail address. Every message we send includes an option of opting out of the mailing list. If you unsubscribe, you will no longer receive marketing-related information via the electronic communication channel you have opted out of (SMS, messaging service or e-mail).

You may at any time object to personal data processing for of direct marketing or market research purposes. You can do this via our customer support services or customer portals Moja Croatia and LAQO.

Please bear in mind that we register your complaints separately for the CROATIA osiguranje brand and the LAQO brand.

Data processing based on your consent. (Article 6(1)(a) of the General Data Protection Regulation)

In certain cases, we may request your consent to process of your personal data. In such cases, we will inform you of the purposes for which we intend to process your data based on your consent.

Where processing is based on consent, you have the right to withdraw your consent at any time. This shall not affect the lawfulness of processing performed based on such consent prior to its withdrawal. Regardless of whether or not you give us your consent for a certain purpose, our mutual rights and obligations defined in the insurance contract remain unaffected.

Your withdrawal or refusal to give consent for specific data processing activities will in no case have an adverse impact on your consumer rights or the level or quality of the services we provide to you.

Data processing using artificial intelligence (AI) tools and systems

For the purpose of providing our services in a more efficient, quicker and effective way, we may also process your personal data using tools and systems based on artificial intelligence (AI). For example, we may use such tools to help us in specific business processes, including the detection and prevention of insurance fraud, insurance claim processing and settlement, segmentation of customers and personalization of offers and providing customer support, including virtual assistants, chatbots and support in the handling of queries, complaints or requests.

Each time you communicate directly with a virtual assistant, chatbot or any other AI system, you will be specifically informed thereof at the beginning of the interaction.

We process data using AI tools on the same legal grounds and for the same purposes as those specified in this document (performance of contract, compliance with a legal obligation, our legitimate interest or your consent). When using AI tools, we implement appropriate technical and organizational security measures and ensure that such data are accurate, secure and minimized.

In most cases, AI tools are used to help employees process claims, analyze data or provide customer support, whereas final decisions that produce legal effects or similarly significantly affect a natural person are taken by an authorized person, save where automated decision-making is specifically permitted under the applicable regulations.

Where processing only includes automated decision-making, including profiling, which produces legal effects or similarly significantly affects you, we will not take such decisions unless we are permitted to take them under the applicable regulations (e.g. if necessary to enter into or perform a contract, required under the applicable legislation or based on your explicit consent) and will use appropriate safeguards. Where automated decision-making is used, you have the right to request further information about the logic underlying such processing and its potential effects on you, as well as the right to human intervention, the right to express your view, and the right to challenge such decisions.

02. TYPES OF DATA WE PROCESS

Depending on the purpose and legal basis, we process different personal data:

- **general personal data:** name, OIB (*Personal Id No.*), MBO (*Insurance No.*), temporary/permanent residence address, contact details, date of birth, sex, nationality;
- **information about the subject of insurance:** identification numbers, designation of characteristics, description, specification, location and other indirect information about the subject of insurance (depending on its type), health information, social status and lifestyle information, profession and income information, information about planned trips, family information, information concerning earnings, loans and bank cards, information about assets and associated photographs. We process such data for the purposes of risk assessment, defining the terms and conditions of insurance and insurance premium, drafting proposals and monitoring insurance product;
- **information about loss events and claims (depending on the type of insurance):** copies of identity documents and other documents, information about the subject of insurance, information about the circumstances surrounding the occurrence of the insured event, information about participants in the loss event, health information concerning the loss event;
- **copies of identity documents and other documents issued by competent public authorities**
- **information required for the administration of the insurance contract, making and receiving payments and lending;**
- **information necessary for insurance fraud prevention;**
- **special categories of personal data.**
- **We process health information because it is necessary for risk assessment and because it affects contract conclusion, but also because it is necessary for the performance of the obligations arising from that contract and for the exercise of rights upon the occurrence of an insured event. We also process information on memberships in trade unions if that information is required for entering into and performing contracts.**
- **financial and related information:** we process it for the purpose of making payments and collecting insurance premium, recourse payments and other receivables;
- **information required to take steps to comply with the insurer's legal obligations, including:** anti-money laundering, customer due diligence, accounting, bookkeeping and tax obligations;
- **information concerning customer segmentation and profiling and information obtained by research;**
- **information concerning debt enforcement, execution, administrative and court proceedings and settlements;**
- **information concerning your complaints, queries, objections and customer support requests, audio records of customer support services and insurance sales, and information used to control access to our facilities and for video surveillance purposes;**
- **information concerning the implementation of our benefits and loyalty programs, prize games and prize contests;**
- **information concerning the provision of digital services and use of the customer portal and mobile apps;**
- **information concerning sponsorships, donations and public information of our products;**
- **information concerning direct marketing tailored to your profile;**
- **data collected while you browse our website:** we use cookies with different functions on our website – further information is available in the Cookies Policy section of our website.

We need certain data to be able to enter into and perform our contract with you and to comply with our legal obligations. If you fail to provide such data to us, we will not be able to enter into contract with you and provide the required service.

03. WE COLLECT, USE AND SAFEGUARD DATA IN COMPLIANCE WITH EUROPEAN STANDARDS

We may collect your data directly (in a situation where we request data from you) or indirectly (where data are received from third parties).

3.1. From which sources do we collect data?

We do not necessarily obtain the data we process directly from you. This is referred to as indirect data collection.

In this case, depending on the purpose of data processing, we may also obtain data from: policyholders (e.g. if the policyholder is not also the insured), insureds, beneficiaries, injured parties (persons who incur losses) and other participants in loss events, parties responsible for losses, household members within the Spektar Loyalty Program, other insurance companies, various associations, competent institutions, publicly available sources, claim adjusters or other business partners.

3.2. Who has access to your data?

We are committed to safeguarding your personal data in compliance with the highest applicable standards, which means that we will not communicate them or make them available to any third parties.

This will not be done unless is necessary for the purpose of entering into and performing insurance contracts, exercising the Insurer's legal rights following the occurrence of an insured event or compliance with our legal obligations, or where legitimate interest exists or you gave given your consent. It may also be done if:

- **you have given your explicit written consent to the communication of certain confidential data for a specific purpose or to a specific party;**
- **such data are required by the Ministry of the Interior, by the competent State Attorney's Office or by any other public authorities for the performance tasks within their respective remits;**
- **such data are required by another reinsurance or insurance company for the reinsurance or insurance purposes;**
- **such data are required by a court or a notary public, and the presentation of such data has been requested in writing;**

- **such data are required in situations defined in the Anti-Money Laundering and Terrorism Financing Act, the Compulsory Transport Insurance Act, the Insurance Act or any other applicable legislation under which we are required to process data;**
- **such data are required by an entity within CROATIA osiguranje Group;**
- **such data are required by health institutions or pharmacies;**
- **such data are required by a roadside assistance provider (where such services have been arranged);**
- **such data are required by mail delivery companies, e.g., Hrvatska pošta or Lider Express;**
- **such data are required by financial institutions, leasing companies or payment card schemes for the purpose of collecting payments for our services;**
- **such data are required by the Croatian Insurance Bureau or other insurance companies;**
- **such data are required by lawyers, court expert witnesses, external appraisers or medical reviewers; or**
- **such data are required by other business partners or auditing companies.**

By becoming a registered member of a household within the Spektar Benefits Program, all members of the same household have access to the personal data (name, address, insurance) of all members of such household.

We also occasionally use services of our partners-processors who process your personal data on our behalf and solely in compliance with our instructions in order to provide us with services such as IT support, preparation and printing of documents, insurance distribution, marketing activities and other similar services.

Such processors may include AI tool and system providers who process personal data on our behalf and strictly in accordance with our instructions for the purpose of providing the services outlined in this document. We enter into processing contracts with such providers and ensure that appropriate technical and organizational security measures are implemented.

We do not use your personal data to train third-party AI models or make them available to any other entities for such purpose.

Where such processing using AI tools involves exporting data outside the European Economic Area, we implement the required security measures specified in this document.

In three specific cases, we also act as joint controllers. This means we make joint decisions with other companies about the processing of your data where:

- **we have underwriting contracts in place at the time of entering into coinsurance contracts with other insurance companies;**
- **we have an bancassurance contract in place with certain banks and our products are part of the bank's product portfolio or in cases where we manage a portfolio of our mutual clients together with the bank and assess the likelihood of their obtaining certain financial services; or**
- **we provide the roadside assistance or emergency intervention services and our partners help us with claim notification and adjustment activities.**

3.3. For how long do we retain your data?

The data retention period depends on the purpose for which the data were collected, the legal basis, type and term of the insurance contract, the processing of claims, the time limits applicable to claims, legal obligation to retain data, and our business interests.

3.4. In which countries are your data processed?

We normally process your personal data within the European Union and the European Economic Area (EU/EEA). In certain situations, your personal data may be transmitted or made available to recipients outside the EU/EEA, e.g. where this is necessary for reinsurance or coinsurance purposes, to process a claim originating in a third country or to use specific services of our business partners. No such data will be transmitted by us without an appropriate legal basis and unless the required security measures are in place, e.g. an adequacy decision of the European Commission or standard contractual clauses.

04. YOU MAY EXERCISE YOUR RIGHTS AT ANY TIME

4.1. What are your rights with regard data processing?

- **Right of access**: you have the right to contact us at any time to learn whether your personal data are being processed. If so, you may request access to that data. At your request, we will send you a copy of the personal data being processed. Should you request additional copies, you may be charged an administration fee.
- **Right to rectification**: If your personal data being processed are inaccurate, you may request that we rectify them at any time or, if they are incomplete, you have the right to supplement them.
- **Right to erasure**: you are entitled to request that we erase your personal data if the legal basis for their further processing or storage no longer exists.
- **Right to restriction of processing**: you may request that we restrict the processing of your data where one of the following applies:
  - you contest the accuracy of your personal data for a period that allows us to verify the accuracy of such data;
  - the processing of your data is unlawful, but you oppose their erasure and request restriction of their processing instead;
  - such data is no longer required for the purpose for which you made them available, however, you need them for the establishment, exercise or defense of legal claims;
  - you have objected to the processing, and it is to be restricted until the objection is resolved;
- **Right to data portability**: you may request to be provided with your personal data you have provided to us in a structured, commonly used and machine-readable format. This does not apply unless such data processing is based on consent or contract and the process is fully automated.
- **Right to object**: you may at any time object to the processing of your personal data and profiling if we process them based on our legitimate interests. After receiving your objection, we will no longer process your personal data unless there are compelling legitimate grounds for their processing which override your interests, rights and freedoms, or if they are processed for the establishment, exercise or defense of legal claims. If you have objected to data processing for direct marketing purposes, we will no longer process your personal data for that purpose.
- **Right to object to automated decision-making and profiling:**
- **You have the right to oppose any decision based solely on automated processing, including profiling, where such a decision produces legal effects or similarly significantly affects you.**
- **Right to lodge a complaint**: If you believe that our processing of your personal data is in violation of the General Data Protection Regulation or any other legislation concerning personal data protection, please contact our Data Protection Officer, whose contact details are provided below. In any event, you have the right to lodge a complaint with the national supervisory authority (Croatian Personal Data Protection Agency) or to a supervisory authority within the EU. Contact details of the supervisory authority: Croatian Personal Data Protection Agency (CPDPA), Ulica Metela Ožegovića 16, 10000 Zagreb, e-mail: azop@azop.hr, tel.: 01 4609 000, web: azop.hr.
- **Right to withdraw your consent**: Where processing is based on your consent, you have the right to withdraw your consent at any time, and this will not affect the lawfulness of the processing completed based on such consent prior to its withdrawal.

You may request the exercise of your rights:

- **by e-mail at zastitapodataka@crosig.hr**
- **by telephone at 072 00 1884 —8 a.m. to 8 p.m. on business days and 8 a.m. to 3 p.m. on Saturdays**
- **at CROATIA osiguranje d.d., Vatroslava Jagića 33, 10 000 Zagreb.**

In order to additionally protect you, we may ask you to provide further information after receiving your request to verify that it was indeed you who made the request.