



# Privacy Notice



The purpose of this Privacy Notice is to explain how and for what purposes we use your Personal Data. Please read this Notice carefully.

## 1. Who will process your Personal Data

Generali Hellas Insurance S. A. ("Generali") will process your Personal Data, acting as Data Controller. You can contact us at the following address:

Central Offices:

35-37 Ilia Iliou & Pytheou St.

11743 Athens

T: 2108096400

Branch Office:

48, Michalakopoulou St.

115 28 Athens

T: 2107268000

[www.generali.gr/epikoinwnia](http://www.generali.gr/epikoinwnia)

If you have any question regarding the processing of your Personal Data, if you wish to exercise any of your rights or to file a complaint regarding your Personal Data, you may contact our Data Protection Officer, either by post to Generali's address to the attention of the Data Protection Officer or via email at: [compliance.dataprotection@generali.gr](mailto:compliance.dataprotection@generali.gr)

## 2. How will we process your Personal Data

Generali will process your Personal Data in order:

1. to assess (underwrite), reinsure, and manage the insurance risk and determine the premium,
2. to enroll you as a member of the group insurance policy,
3. to provide the insurance coverage under the group insurance policy, including the assessment, review, and settlement of any insurance compensation in the event of occurrence of the insurance risk,
4. to inform you about group policy -related issues and to request information on your level of satisfaction from Generali services,
5. for Generali to comply with obligations imposed by the applicable legislative and regulatory framework, including complaints handling,
6. to combat insurance fraud,
7. to promote Generali insurance products.

In cases 1), 2) and 3) above, legal basis for the processing of your Personal Data is the performance of the necessary pre-contractual actions and the fulfillment of the group insurance policy terms [article 6 § 1 (b) of the General Data Protection Regulation]. Special categories of your Personal Data, which relate to your health, are processed only with your express consent, based on the provision of article 9 § 2 (a) of the GDPR. In cases 4) and 6) above, the processing is necessary for the purposes of the legitimate interests pursued by Generali (art. 6, par. 1(f) of the GDPR). In case 5) above, legal basis for this processing of your Personal Data is the compliance of Generali with the obligations imposed by the applicable legislative and regulatory framework [article 6 § 1 (c) GDPR], and, lastly, in case 7), the legal basis is your consent [article 6 § 1 (a) GDPR].

## 3. Which Personal Data we process

We will process only the Personal Data that are strictly necessary for the aforementioned purposes. In particular, Generali will process:

1. Your identification data [full name, ID No., TIN, Social Security No. (AMKA), etc.].
2. Your contact details (address, telephone, e-mail, etc.).
3. Your bank account details (IBAN) or your credit card details.
4. Data relating to your income (income tax return form, etc.), if required.
5. In case of an underwriting process, your medical history based on your answers to the questionnaire you filled in with your application or even any medical or diagnostic tests and the results thereof, which you may adduce to Generali.
6. In case of an underwriting process with tele underwriting: your medical history based on your answers to the questionnaire you filled in during the telephone interview or even any medical or diagnostic tests and the results thereof, which you may adduce to Generali.
7. Any other data that Generali keeps on file from previous transactions with you.

We have acquired access to your Personal Data either directly from you or via ALPHA BANK S.A.

If any insured risk occurs, Generali may request additional data and supporting documentation relating to the incident.

#### 4. With whom we share your Personal Data

---

We may share your Personal Data with external organizations, such as the insurance intermediary of the group insurance policy, cooperating medical experts, our external partner that carries out the telephone interview (if applicable) or coordinates the pre-policy medical checkup (if necessary). In addition, we will disclose your Personal Data and coverage and/or exclusions information to our partners providing call-center services for the provision of the services and coverage provided for in the group insurance policy, as well as to any private hospitals & other health services providers, in case you need to use said services. We may, also, share your Personal Data with the parent company of the Generali Group, other companies of the Generali Group, as well as with cooperating reinsurance companies. Generali has taken the necessary steps to ensure that only the strictly necessary data are transferred at a time and that all processing activities are legitimate.

Generali will not disclose in any way your Personal Data to any third party that is unrelated to the group insurance policy and the provision of the coverage and the services provided for therein, unless required by law or upon a lawful request or order by a public authority. Generali will not transmit any of your Personal Data to third parties, to be used in commercial promotional activities, without your prior express consent.

#### 5. Why is the collection of your Personal Data required

---

The collection of your data is necessary for your enrollment in the group insurance policy. If you do not provide your Personal Data, unfortunately, Generali will not be able to enroll you in the group insurance policy and/or provide the coverage and services provided for therein.

#### 6. Your rights with respect to Personal Data

---

You may exercise the following rights as regards your Personal Data: Right of Access, Right to Rectification, Right to Portability, and, provided that the conditions of the law are met, Right to Erasure, Right to Restriction, and Right to Object.

You may, also, withdraw the consent you have provided for the processing of your Personal Data, at any time. Unfortunately, in such a case, Generali will not be able to provide you with the coverage provided for in your insurance policy (withdrawal of consent). Withdrawal of consent does not affect the legality of any previous processing activity.

For additional information regarding the conditions for exercising your rights, you may visit the Generali webpage ([www.generali.gr](http://www.generali.gr)). You may exercise your rights via our webpage or, alternatively, you may contact directly the Data Protection Officer at [compliance.dataprotection@generali.gr](mailto:compliance.dataprotection@generali.gr) for the exercise of your rights, as well as for any other information.

#### 7. How to file a complaint

---

In the event that you believe that the protection of your personal data is being compromised in any way, you may file a complaint with the Personal Data Protection Authority: 1-3, Kifissias av., P.C. 115 23, Athens, [www.dpa.gr](http://www.dpa.gr).

#### 8. How long we retain your Personal Data

---

We will retain and process your Personal Data for the purposes stated above for as long as you are a member of the group insurance policy and this remains in force, as well as for up to twenty years after your withdrawal or the expiry of the group policy for any reason unless a different retention period is provided for by law. In case you do not enroll in the group insurance policy, we will retain your Personal Data for up to five years.

#### 9. Automated decision-making, including profiling

---

In order to assess your application for enrollment in the group insurance policy, we will process your Personal Data in an automated way, including profiling. The automated process will evaluate the application for enrollment based on Generali's underwriting rules and will issue a specific insurance quote. This specific automated process, which includes the use of algorithms, is based on mathematical/statistical analyses of the critical parameters, from the technical insurance perspective, which aim to the proper evaluation of the risk exposure and the determination of a suitable and proportional premium amount.

More specifically, the logic involved in the automated processing enables: i) the objective risk assessment, ii) its integration in a homogeneous risk group, on the basis, mainly, of the frequency, and iii) the scale of the damage that it may cause, as well as its appropriate pricing. The automated processing concerns data that you have provided via your application for enrollment, as well as data that may be collected from third sources. Based on this automated processing, a variation in the premium may occur.

As regards this Processing, you have the right not to be subject to any decision, if such decision is based exclusively on automated processing and produces legal effects concerning you or affects you significantly. You have also the right to express your point of view regarding this decision, to be informed of its justification and contest its content. To exercise all your aforementioned rights, you may contact the competent Department or the Data Protection Officer (by sending a relevant request via email at: [compliance.dataprotection@generali.gr](mailto:compliance.dataprotection@generali.gr), or by post at the following address: 48, Michalakopoulou, 115 28 Athens, to the attention of the competent Department/Data Protection Officer).

Lastly, Generali may use automated processing during the validity period of the group insurance policy, in order to carry out controls for the avoidance of insurance fraud and compliance with the obligations arising from the anti-money laundering and automatic exchange of financial account information legislation.