



Privacy Notice



Your privacy is important to us. That is why we are committed to protecting your personal information and treating it with the utmost care and attention. In this privacy notice, we will transparently explain how we collect, use, share and protect your personal information.

Data Controller Details

GENERALI HELLAS Insurance Company S.A. (the «Company»), Syggrou Ave. and Lagoumitzi 40, 117 45 Athens.

Should you have any questions or wish to exercise a right concerning the processing of your personal data, you may contact our DPO at the following addresses:

- E-mail: dpo@generaligr
- Mail: Syggrou Ave. and Lagoumitzi 40, 117 45 Athens

Furthermore, if you sign the Insurance Application with a qualified electronic signature and have any questions regarding the processing activities carried out by the Company and ALPHA BANK S.A., as joint Controllers for the electronic signature, including the request for a copy of the main contents of the joint controllership agreement, you may alternatively contact the DPO of ALPHA BANK S.A. by email at contact-DPO@alpha.gr

Why do we process your Personal Data and on which legal ground?

The Company processes your personal data to manage its relationship with you, guarantee efficient insurance, products, services and better respond to your specific needs. The Company processes your personal data for:

1. Insurance Purposes - Processing related to your insurance contract with Generali

Activity	Legal ground
1. Concluding and managing insurance products and services contracts. It includes underwriting activities, such as reviewing applications, preparing estimates and submitting quotations, and portfolio management activities, such as issuance, cancellation, renewal, amendment of insurance policy and premium adjustments. 2. Concluding and managing Reinsurance and Co-insurance contracts related to your contract, when necessary. 3. Handling and verifying claims. 4. Managing payments and reserves. 5. Managing the relationship with you, including assistance services channels, customer care, contact center and information requests and complaints.	Necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the data subject's request.
6. Managing network and information IT and Security (such as Company asset management, continuity).	It is necessary to fulfil a legal obligation to which the data controller is subject (e.g. DORA) and its legitimate interest to grant its functioning and protection, for the processing activity not falling under legal obligations.
7. Using statistical and data analysis to better understand your needs and improve our products and services. This helps us make informed business decisions that support our goals and ensure alignment with the Group's overall strategy and interests. This entails activity such as: a. Assess and report on contract and portfolio performance b. Perform controls activities c. Assess risk indicators d. Monitor operational effectiveness e. Improve our insurance products, our services, processes and assets,	We rely on our legitimate interest to grant enhancing of Company' insurance offerings, improving customer service, increasing operational efficiency, innovating and granting alignment with Group strategic plan and governance for the processing activity not falling under legal obligations.
8. We share a limited and strictly necessary set of your Personal Data with Assicurazioni Generali Sp.A., our Group parent company. This allows them to carry out statistical and analytical activities, such as business intelligence or KPI analysis, to support the Group's strategic coordination, planning, controlling, and oversight.	We rely on our legitimate interest in contributing to the Group's strategic coordination, control and oversight for the processing activity not falling under legal obligations.

9. The Company might send your Personal Data to Assicurazioni Generali S.p.A., Group parent company, for improving services, products, statistical and analytics by new technological solutions.	We rely on the legal ground, from time to time, deemed appropriate (consent or legitimate interest).
10. Company strategic development, taking part in corporate transactions, mergers and acquisitions, restructuring, extraordinary operations.	We rely on our legitimate interest to evaluate and conclude strategic operations, to make informed business decisions, ensure business continuity and integration, protect our strategic and economic interests.
11. Insurance fraud prevention and detection activities. This activity uses statistical and data analytics.	We rely on our legitimate interest of preventing and reducing frauds and frauds related risks.
12. Exercising or defending the Company's rights in court.	We rely on our legitimate interest to defend the rights of the Company, its officers, representatives and shareholders in a potential dispute.
13. Fulfilling regulatory and legal obligations (national and supranational, such as anti-money laundering, financial reporting and tax obligations). Within this fulfilling activity, the Company can send a strictly necessary subset of your Personal Data to Assicurazioni Generali S.p.A., Group parent company, to contribute to the fulfilment of Group related regulatory and legal obligations.	It is necessary to fulfil a legal obligation to which the data controller is subject.
14. Activities to find out your level of satisfaction with purchased products and services.	We rely on our legitimate interest.

We only process Personal Data necessary for the performance of the activities indicated above. This Data includes:

- your identification details (name, surname, personal identification number, tax identification number, nationality, special registration number etc.);
- your contact details (address, telephone number, email, etc.);
- your bank account details (IBAN) or your credit or debit card details;
- details of your property, depending on the type of insurance contract you have chosen (photos, geolocation data, etc.);
- data related to your insurance policy, such as policy number, coverage details, claims history, and your health data, in case you have chosen personal accident or travel insurance coverage;
- any other Personal Data that the Company maintains in its records from previous transactions with you;
- depending on the type of insurance policy you have chosen (e.g., liability of any kind, fire, etc.), creditworthiness data through the ICAP company database, as well as property details via the National Cadastre;
- in cases of a submitted claim for compensation due to a reported damaging event or accident, the Company will collect and process Personal Data of third parties that come to its knowledge due to the accident in which these persons are involved, including any health data in case they suffer bodily injuries;
- if you choose to sign the Insurance Application with a qualified electronic signature, ALPHA BANK S.A., acting as the Registration Authority and responsible for issuing the qualified electronic signature in accordance with Regulation (EU) 910/2014 eIDAS, Article 57, and the Certification Regulation of A.P.E.D., and as Joint Controller with Generali for the electronic signature together with Generali, which determines the purpose of processing (conclusion of the insurance contract), will collect and transmit your identification data—such as full name, father's name, ID card or passport number and country of issue, as well as your email address, mobile phone number, Tax Identification Number, and country of tax residence—to the company Namirial, which is a Qualified Trust Service Provider under Regulation (EU) 910/2014 eIDAS, as currently in force, and with which the Bank cooperates for the purpose of issuing a qualified electronic signature certificate for signing a digital contract concluded remotely through electronic means.

Health Data

Your consent will be required in case of processing of special categories of data, such as health data. This data is only processed when strictly necessary for the provision and management of your insurance product, service, related risk assessment and claims handling included.

2. Profiled Commercial and Marketing Purposes

The Company processes your Personal Data also to inform you about news and opportunities that may be of interest to you, as well as improve your experience. This activity is done by profiling your consumption habits preferences and interests, which allows us to better understand your needs and offer you a tailor-made marketing experience.

Activity	Legal ground
1. Sending tailor-made special offers related to our insurance products and services.	The person concerned has consented to the processing of his or her Personal Data.
2. Delivering satisfaction questionnaires and quality surveys on products/services; market research and statistical surveys.	
3. Sending communications for participation in prize competitions or loyalty programs related to our products and services.	
4. Sending promotional initiatives relating to other Group companies or third parties' products and services.	
5. Performing statistical and data analytics activities to improve the special offers related to our products and services, and the other above listed initiatives.	

6. Performing statistical and data analytics activities to assess and report on the above activities' performance	Necessary for the pursuit of the legitimate interest of the data controller.
7. "Soft spam": sending offers concerning similar products or services to those already purchased, through the same channel provided at the time of purchase (e.g. e-mail or telephone).	Art. 11 par. 3 of L. 3471/2006

We only process Personal Data necessary for the performance of the activities indicated above.

The consent we ask you for the purposes described in point 2 is free and optional. If you decide not to provide it, there will be no effect on the provision of the insurance products and services you subscribed to. Your choice will in no way affect the quality or availability of the services we offer to you.

Personal Data Origin

The Personal Data the Company processes for the purposes described in points 1 and 2 are provided by you (directly, such as when you fill in a form or contact customer service or indirectly, such as when you interact via our website, apps, chatbots) or acquired from third parties (such as brokers, agents, Authorities etc.). Data may also be observed, inferred or generated relating on the previous ones.

How do we process your Personal Data?

The Company processes your Personal Data in both manual and automated form, using the best solutions.

We use statistical and artificial intelligence (AI) systems and analytical solutions.

The use of AI allows us to analyze your Personal Data more deeply and quickly, improving our ability to respond to your specific needs. These systems help us customize our products and services, optimize internal processes and pursue the purposes above mentioned at points 1 and 2, thus ensure a high level of quality experience and that all is aligned with the Group's overall strategy and interests. As said, we process your Personal Data only when strictly necessary, encouraging the use of anonymized or aggregated datasets, when possible.

Automated Individual Decision-Making (within the framework of issuing and managing non-life insurance policies)

Depending on the type of insurance policy you have chosen, we may handle the below processing activity in a fully automated way, which means that no human intervention takes place in the processing activity. This is possible, because the processing

- is necessary for entering into or fulfilling a contract between you and the Company.
- is based on your explicit consent.

Remember that you can always request human intervention, as per applicable regulations.

Process	Legal ground	Personal Data collected
Automated assessment of the insurance application based on the Company's underwriting rules and automated issuance of an insurance proposal and/or policy.	Consent/Contract	Simple data included in the insurance application and other accompanying supporting documents.

To whom do we disclose your Personal Data?

Your Personal Data will be processed by Company' employees and contractors within the scope of their duties and according to their instructions. Your Personal Data will only be shared with third parties expressly appointed to carry out activities related to the management of your relationship with the Company, such as:

- Entities that are part of the so-called "insurance chain", such as insurance intermediaries, banks and financial institutions, co-insurers and reinsurers, pension funds, lawyers, doctors, technical consultants, healthcare units, claims and contract settlement companies, and other contracted service and coverage providers, such as technical assistance, legal protection, etc.
- The subsidiary company ARISTON SERVICES S.A., which provides call center, coordination center and accident care services.
- Companies of the Generali Group.
- Other third-party companies providing services such as IT, telematics, financial, administrative, archiving, correspondence management, auditing and certification, as well as companies specializing in service quality research.
- In cases of a submitted claim for compensation due to a reported damaging event or accident, other potentially involved insurance companies, or third natural or legal persons who may be liable for it.
- Competent Authorities, Chambers of Commerce Associations, etc., if required by law or by a legitimate request or order from a Public Authority.
- The companies CYBERX CSIS Cybersecurity and Insurance Brokerage Services IKE and TIK TAK Data Recovery and Computer Support IKE, in case you have chosen the insurance contract "Alpha Cyber Security."

Depending on the activity carried out, the parties mentioned above may act as data processors, joint controllers, or autonomous data controllers. When your Data is sent to Assicurazioni Generali S.p.A. in the exercise of its parent company activities, it acts as an autonomous data controller.

As a rule, we do not transfer your Personal Data to countries outside the European Economic Area (EEA).

In exceptional cases, limited to the purposes set out above, we may transfer your Personal Data to third parties or public bodies who so request -given that the request is justified and legitimate -, including countries outside the EEA. In all cases, transfers will be made in accordance with applicable law and international agreements in force and based on appropriate and adequate safeguards (such as, for example, to countries deemed adequate by the EU Commission or through the adoption of standard contractual clauses approved by the EU Commission).

What rights can you exercise as a Data Subject?

You can exercise the right of access, rectification, portability, and, provided that the legal requirements are met, erasure, restriction of processing and objection, in respect to your Personal Data.

In case you provided your consent to the processing of Personal Data, you may withdraw it at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

If your Personal Data are transferred outside the European Economic Area, you have the right to obtain a copy of such data, as well as an indication of the Country/Countries where the Data have been made available.

If you believe that the protection of your Personal Data is being compromised in any way, you may file a complaint before the Hellenic Data Protection Authority: (address:1-3, Kifissias Ave., 115 23 Athens), www.dpa.gr.

You can exercise your rights by contacting the Data Protection Officer at the contact details above indicated. The request for exercise of rights is free of charge unless the request is manifestly unfounded or excessive.

How long do we store your Personal Data?

Your Personal Data are kept for as long as necessary for the management of the relationship, in accordance with current legislation, considering the Company's need to access them to exercise a right or defend itself in court.

The deletion/anonymization of Personal Data acquired for the performance of contractual or pre-contractual measures will take place twenty years after the termination of your policy, or five years in case the insurance policy was finally not issued.

The data collected following your consent for marketing purposes will be stored for a maximum of 36 months.