

PRIVACY NOTICE

As an insurer it is our duty to offer you insurances, assist you with any claims and where needed, offer you compensation.

To this effect, we have to process personal data of (potential) clients and of our partners. Processing personal data means: collecting, using, storing, securing, modifying, disclosing and ultimately also erasing data in compliance with the law.

We thank you for the trust you put in us and therefore attach great importance to the protection of your personal data.

This Privacy notice states our vision on the security of your personal data and explains why and how we use the data, what we do with them and what our legal grounds are.

We invite you to take the time to read this Privacy notice attentively. This notice can be modified to keep it updated, the version on our website is always the most recent version.

1. Who will process your personal data?

Europ Assistance Belgium N.V.-S.A., with headquarters at Boulevard du Triomphe, 172 in 1160 Brussels, VAT BE 0457.247.904 RPR Brussels, is the controller who processes your personal data. This means that we determine how and for which purposes your personal data will be processed. You can direct all your questions, suggestions and complaints with regards to your personal data to our data protection officer (see 5.9.).

2. Which data do we process?

We can process personal data that we obtained from you, such as:

Personal data that enable us to identify you, either directly or indirectly, including:

- Identification data (e.g. your name and date of birth);
- Contact data (e.g. your address, telephone number and e-mail address);
- Bank details for processing your payments (such as your bank account number);
- Family composition (e.g. the names and dates of birth of your family members);
- Data about your vehicle (e.g. your license plate number);
- Data about your house;
- Geolocalisation (in case you provide those data to us with regards to a claim);
- Image and sound recordings;

We can use data received from external sources, such as employers taking out insurance policies for their employees. This could also be the case for professional data suppliers for the correction of data (e.g. the correction of the spelling of your address) and the enrichment of data.

In certain cases, the personal data you provide do not only relate to yourself, but also to one or more of your relatives or relations (e.g. your children, spouse, employees, ...) or to a person involved in a claim. If you disclose the personal data of other people to us, you need to inform them first.

You could also provide personal data concerning your health in case of a claim. These data are subject to a higher level of protection and we can only process them to provide our services and to manage claims.

3. For which purposes do we process your personal data?

Europ Assistance Belgium will process your personal data for the purposes mentioned below. Only those personal data that are relevant to achieving the intended purposes will be processed.

When we ask you for personal data, you have the right to refuse. However, this refusal could be a hindrance to the conclusion of an insurance contract, could alter the nature of the contract or affect its management.

3.1. Processing to deal with policies and claims

We collect, store and process your personal data when this is necessary to:

- manage the client relationship with yourself as a (potential) client, with your insurance broker and with commercial partners who provide services or carry out specific activities on behalf of Europ Assistance
- sign, manage and execute your insurance contract
- draw up a client profile
- provide services
- handle claims

Data concerning your health will only be processed by us if you disclose those data to us on your own initiative, directly or via third parties, to respond to your explicit request for intervention and to comply with our contractual obligations based on the legal regulations with regards to the insurance sector, including the law of April 4, 2014 on insurances.

3.2. Processing to comply with the law

We can use your personal data to comply with the law, for example to:

- prevent money laundering and combat terrorism;
- apply the *MiFID* regulations;
- fight against tax fraud;
- comply with Europ Assistance's fiscal obligations.

3.3. Processing for legitimate interests

When using your personal data for reasons concerning our legitimate interest, we strive to find a balance between the interests of Europ Assistance and your right to privacy. This only concerns situations where we process your personal data in order to function optimally and provide you with the best services, for example to:

- manage our distribution channels;
- evaluate and improve our existing services and products;
- develop new services and products;
- detect and prevent abuse and fraud;
- handle complaints;
- monitoring and control;
- secure goods and people, as well as IT networks and systems of Europ Assistance;
- determine, exercise, defend and protect our rights or those of the people we may represent, for example in case of disputes;
- get an overall view of our clients, for example to produce statistics;
- improve our internal organisation;
- test, evaluate, simplify and optimise our internal processes to make them more efficient;
- test, evaluate, simplify and optimise our online systems to improve your user experience;

3.4. Processing for marketing purposes

If you have signed an insurance contract as a client directly with Europ Assistance, we can use your data to offer or propose our products and services tailored to your personal situation. Under no circumstances will your personal data be sent to third parties for their own canvassing and Europ Assistance will not contact you to offer you products or services of third parties. Our canvassing will always be limited to information about the products or services offered by Europ Assistance and for which you have already expressed an interest or signed a contract.

If you have taken out an insurance with Europ Assistance indirectly (via a third party), for example through your insurance broker, your employer, your travel agent,... Europ Assistance will only use your data for marketing purposes if we have the prior consent of the third party (the insurance broker, your employer, travel agent,...). This third party in turn also needs to have your prior consent.

4. Who can we share your personal data with?

4.1. Inside our company

To optimally protect your privacy, we will only share with our employees the data they need to fulfil the duties they were entrusted with.

4.2. Transfer of your data to other companies within the Europ Assistance Group

Your personal data can be disclosed to other companies within the Europ Assistance Group, for example to assess risks, for purposes of reinsurance or to handle a claim that occurred abroad.

4.3. Exchanging data with third parties

Within the scope of the purposes mentioned above and to the extent that it is justified, we can obtain relevant additional data from or share it with authorities, private insurers, re-insurers, social security institutions, brokers, experts, lawyers and other third parties who are legitimately involved in drawing up or managing the insurance policy or managing a claim or complaint.

If we call on a third party to claim debts or unpaid premiums, we can disclose your data to them.

In order to protect and secure your data or to manage our IT infrastructure, we can share your personal data with specialised companies. We specifically mention in this context the service providers who secure the data given to us (back-up).

These third parties will have access to the personal data they need to carry out their duties. Additionally, they are contractually obliged towards Europ Assistance to process your personal data in a secure and confidential manner and to only use your personal data for the purposes for which the data were disclosed to them.

4.4. Transfer of data outside the European Economic Area (EEA)

It is possible that Europ Assistance transfers your personal data to countries outside the European Economic Area that may not be able to guarantee an appropriate level of protection of your data.

In those cases, Europ Assistance will transfer your personal data with a higher level of security and also contractually demand a higher level of security from its international partners. You have the right to ask us for information concerning the measures taken to protect your personal data in case of a transfer outside the European Economic Area.

5. Which rights do you have and how can you exercise them?

5.1. Right of access:

You have a right of access to your data.

5.2. Right of rectification

You have the right to ask us to correct your data in case you find they are inaccurate or incomplete.

5.3. Right of erasure

In specific cases, you have the possibility to have your personal data erased:

- when your personal data are no longer necessary for the purposes for which Europ Assistance collected them;
- when the processing of your personal data is solely based on your consent and you decide to withdraw it;
- when you have objected against the processing of your personal data and Europ Assistance has no legitimate grounds that override your rights.

Your right to erasure is not absolute. Europ Assistance has the right to continue storing your personal data if the applicable laws and regulations oblige or allow us to store your data.

5.4. Right of restriction of processing

You can ask us to restrict the processing of your data if:

- you dispute the accuracy of your personal data, during the time Europ Assistance needs to check the accuracy.
- the processing is unlawful, but you do not want us to erase the personal data, just to restrict their processing;
- Europ Assistance no longer needs your personal data for processing, but you need it to establish, exercise or defend a legal claim.

5.5. Right of portability

You have the right to request transfer of the personal data you provide to us to yourself or to another controller, to the extent that it is technically possible.

5.6. Right to withdraw your consent

If the processing of your personal data by Europ Assistance is based on your consent, you can withdraw it at any moment. You do have to bear in mind that withdrawing your consent can have as a direct consequence that the execution of the insurance contract becomes impossible.

5.7. Right to objection

If the processing of our personal data is based on a legitimate interest, you have the right to object against the processing of your personal data.

However, we will not be able to consider your request if our legitimate interest overrides yours or if the processing of your personal data remains necessary to establish, exercise or defend a legal claim.

You can always inform us that we cannot use your data for marketing purposes.

5.8. Right to not be subjected to a decision that is solely based on automated processing, including profiling.

In case of automated processing or profiling without human intervention during the processing, you always have the right to request the intervention of one of Europ Assistance's employees and dispute the automated decision.

Particularly when taking out an insurance policy through forms available on our website, this contract is automatically entered into based on the information you have filled out. We guarantee you that we never use profiling. Additionally, you have the possibility to always request the intervention of one of our employees.

5.9. Who can you turn to?

You can direct all your questions on personal data or exercising your rights as described above to our data protection officer. To do so, you need to send a dated and signed request with a copy of your ID via post or e-mail.

The contact data for our data protection officer are:

Europ Assistance Belgium N.V.-S.A.
Data Protection Officer
Triomflaan 172
1160 Brussels
eabelgiumdpo@europ-assistance.be

If you believe the processing of your personal data is in violation of the legislation on the protection of privacy, you also have the right to file a complaint with the data protection authority:

Gegevensbeschermingsautoriteit
Drukpersstraat 35
1000 Brussels
Phone: +32 2 274 48 00
Mail: commission@privacycommission.be

6. How long will we store your data?

Europ Assistance will store your personal data for as long as is necessary for the purposes described above and for as long as the law requires.

Concretely, this means that your personal data will be stored for the entire duration of your insurance contract, during the legal limitation period following the last claim covered by the insurance contract as well as any other retention period imposed by law.