

Your privacy matters to us. So we are committed to protecting your personal information and handling it with the utmost care and attention. Here we provide a clear explanation of how we gather, use, share and protect your personal information.

## A. Data controller

---

**GENERALI España de Seguros y Reaseguros, S.A. (“GENERALI”).**

Registered address: Pl. de Manuel Gómez-Moreno, 5. 28020 Madrid (Spain)

Tax ID: A48037642

Data Protection Officer contact details: [delegadoprotecciondatos.es@generali.com](mailto:delegadoprotecciondatos.es@generali.com)

## B. Data subjects

---

For data protection purposes, this information notice is addressed to potential GENERALI customers whose personal data are processed. Data subject means anyone who has not entered into a contractual relationship with GENERALI but has asked for information or may be interested in taking out a product and/or has been given an insurance quote or estimate.

Other people whose personal data are required to draw up an insurance quote or estimate (e.g. the insured) are also considered data subjects.

## C. Purposes and lawful bases

---

The purposes for which your personal data are processed and the legal bases for this processing are set out below:

### *i. Lawful basis: application of pre-contractual measures*

- a. Manage and evaluate this insurance application and/or proposal including automated individual decision-making and/or profiling by assessing and evaluating your personal data to decide whether to accept or reject your insurance application in compliance with Article 22(2)(a) of the General Data Protection Regulation (EU) 2016/679. In this case you have the right to obtain human intervention on the part of GENERALI to assess your situation, express your point of view and contest the decision if you are not happy with it.
- b. Specify your requirements and needs based on the information you provide and give you objective information about the insurance product you have asked for in an easy-to-understand way so you can make an informed decision as required by Article 20 of Directive (EU) 2016/97 of the European Parliament and of the Council of 20 January 2016 on insurance distribution.
- c. Provide you with the key investor information document (KIID) relating to the insurance-based investment product you have asked for to help you understand its nature and the risks, costs, benefits and potential losses of the insurance you are considering purchasing in compliance with Regulation 1286/2014 on key information documents

for packaged retail and insurance-based investment products (PRIIPs) and Commission Delegated Regulation (EU) 2017/653 of 8 March 2017.

- d. Disclose your personal data and the personal data of the insured, beneficiary or injured third party to reinsurers when strictly necessary for the conclusion of the reinsurance contract under the terms stipulated in section 77 of the Insurance Contracts Act 50/1980 of 8 October or for the performance of related operations, where this means conducting statistical or actuarial studies, risk analyses or investigations for their customers, and any other activity related to or derived from the reinsurance operations.

**ii. Lawful basis: compliance with a legal obligation**

- a. Verify your identity and conduct the relevant checks on your economic activity pursuant to Spanish anti-money laundering and counter-terrorist financing legislation.
- b. Assess, select and price risks associated with the insurance policy you have asked for pursuant to section 10 of the Insurance Contracts Act 50/1980 of 8 October and section 99(1) of the Organisation, Supervision and Solvency of Insurers and Reinsurers Act 20/2015 of 14 July.
- c. Gather information before taking out an insurance-based investment product about your knowledge and experience in the investment field relevant to the insurance you are applying for in sales where no advice is given and also information related to your financial situation and investment objectives in the case of advised sales through appropriateness and suitability tests pursuant to Article 30 of Directive (EU) 2016/97 of the European Parliament and of the Council of 20 January 2016 on insurance distribution.
- d. Compliance with legal and regulatory obligations (supranational, national or local) and reporting information to public authorities, regulators or government agencies arising from these obligations.
- d. Take effective measures to prevent, deter, identify, detect, report and remedy fraudulent conduct relating to insurance pursuant to section 100 of the Organisation, Supervision and Solvency of Insurers and Reinsurers Act 20/2015 of 14 July, including the processing resulting from any actions as may be reasonably necessary may be taken to identify potentially fraudulent information or inaccurate, incorrect or inconsistent data.

**iii. Lawful basis: GENERALI's legitimate interest**

- a. Processing personal data to the extent strictly necessary and proportionate to ensure network and information security, comply with legal obligations (such as Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on digital operational resilience for the financial sector) and maintain business continuity and the security of GENERALI's assets.
- b. Processing personal data associated with the current pre-contractual relationship and previous interactions with GENERALI for the purpose of managing the commercial relationship and your interest in taking out insurance.
- c. Processing personal data resulting from the implementation of any corporate restructuring procedure or the contribution or transfer of business or a line of business when necessary for the successful completion of the procedure and to ensure continuity of service provision.

- d. Exercise or defence of GENERALI's rights in court together with those of its officers, representatives and shareholders in the event of disputes.
- e. Perform statistical and analytical activities to:
  - Carry out control activities.
  - Assess risk indicators.
  - Oversee operational effectiveness.
  - Improve our insurance products, services, processes and assets.

To perform this processing, GENERALI has conducted appropriate balancing exercises between the data subject's fundamental rights and GENERALI's own legitimate interests and has concluded that these rights are not affected. You may ask for a copy of the conclusions drawn from them by contacting the Data Protection Officer at the address shown at the end of section "A. Data Controller".

You may at any time exercise your right to object to this processing by any of the means shown in section "I. Data protection rights".

#### ***iv. Lawful basis: express consent***

- a. Where applicable, complete the health questionnaire and confidentially obtain from the healthcare professionals who work with GENERALI in assessing this health questionnaire any data they may have and any which they may have become aware of while providing their services. GENERALI will then process these data to ascertain all the circumstances relating to your state of health which may influence our assessment of the risk and decision about whether to accept your application and issue the policy pursuant to section 10 of the Insurance Contract Act 50/1980 of 8 October.
- b. Processing personal data to make marketing offers for any type of our own products and services provided that the data subject has opted in and using any means of communication for this purpose.

We sometimes process personal data from companies which have the data subject's consent to transfer such data to GENERALI to offer GENERALI products and services using any means of communication.

You also warrant the accuracy of any personal data you provide to GENERALI. GENERALI may likewise ask you to review and update the personal data it holds about you from time to time.

## **D. Data categories and sources**

---

GENERALI will only process the data strictly necessary to fulfil the purposes described in section "C. Purposes and lawful bases" above.

This includes, but is not limited to, your identification data, contact data, personal characteristics data, economic and financial information data, information data derived from your insurance application, specially protected data (such as health data where needed), browsing data from the GENERALI website or from third parties with which we have an agreement, and any other data as may be necessary to fulfil the aforementioned purposes.

Regardless of the personal data provided by you and/or your insurance intermediary, GENERALI may process personal data from common systems, advertising opt-out systems,

industry systems and/or public agencies in accordance with the purposes and lawful bases described in section “C. Purposes and lawful bases” above.

Based on the above, GENERALI will process personal data provided by the aforementioned third parties in the following categories:

- i. Identification data.
- ii. Postal or electronic addresses.
- iii. Financial data.
- iv. Health data.

## **E. How we process your personal data**

---

GENERALI processes your personal data both manually and automatically using the best solutions available. We use statistical and artificial intelligence (AI) systems and analytical solutions. AI enables us to analyse your personal data more thoroughly and quickly, improving our ability to meet your specific needs. These systems help us to personalise our products and services, optimise internal processes and fulfil the purposes mentioned in section C, thus ensuring a premium experience aligned with the Generali Group’s strategy and interests. As noted, we process your personal data only when strictly necessary and use anonymised or aggregated datasets whenever possible.

GENERALI uses email, text messages, WhatsApp instant messaging, fax, certified fax or post interchangeably as a means of sending messages and notifications unless you have told us otherwise.

However, if you wish to contact us via social media (e.g. Twitter, Facebook, WhatsApp, etc.), we will answer your enquiry in the same way and in compliance with the terms of data protection regulations, although we may also use the means referred to in the previous paragraph.

To ensure the security and proper provision of GENERALI services over the phone, GENERALI may record and store any phone calls made.

## **F. Recipients of the data**

---

GENERALI may disclose your personal data to public authorities, regulators or government agencies when there is a legal or regulatory obligation to do so.

As part of this insurance application and/or proposal and in accordance with the purposes and lawful bases described in section “C. Purposes and lawful bases” above, we may also disclose certain data to:

- Insurers, co-insurers and reinsurers.
- Advertising opt-out systems.
- Professional service providers:

Specifically, your personal data may be disclosed where appropriate to various categories of recipients including, but not limited to, loss adjusters or other similar professionals, vehicle repair garages, lawyers, court representatives and notaries, detectives, claims agents, medical and hospital care centres, medical assessors,

rehabilitation managers, group accident managers, pension fund managers, document archive managers, rescue and salvage companies, damage surveyors, accident reconstructionists and investigators, roadside assistance companies, scrap yards, claims management companies and contract managers.

They may also be disclosed where appropriate to other service providers, which may be companies in the Generali Group and external companies, in the following sectors: auditing and certification, consulting, document storage and scanning, correspondence management, electronic signatures, administrative management and customer service, finance, telephony, IT, technological development and/or online platforms and service quality surveys.

The above recipients may act as data processors, data controllers or joint data controllers depending on the activities performed.

## **G. International transfers**

---

As a general rule, we do not transfer data to countries outside the European Economic Area (EEA).

However, and restricted to the purposes specified above, we may transfer personal data to third parties or public authorities on request, including to countries outside the EEA. Any such transfers will be made in compliance with applicable law and international agreements and with appropriate and sufficient safeguards (such as to countries considered suitable by the European Commission or through the adoption of standard contractual clauses approved by the European Commission).

The customer may get a copy of the measures required by GENERALI by contacting the Data Protection Officer at the address shown at the end of section A.

## **H. Retention of personal data**

---

GENERALI will keep the data from any insurance application and/or proposal which does not lead to a contract blocked for the periods of limitation set by law. At the end of these periods we will destroy the data.

GENERALI's data retention periods are fixed based on the requirements of applicable laws, regulations and regulatory guidelines together with GENERALI's operational requirements for managing customer relationships.

## **I. Data protection rights**

---

You may exercise your legal rights of access, rectification and objection and the right to erasure, restriction of processing and data portability by writing to GENERALI España de Seguros y Reaseguros, S.A., Pl. de Manuel Gómez-Moreno, 5, . 28020 Madrid, or by emailing [dataprotection.es@generali.com](mailto:dataprotection.es@generali.com). In both cases you must include proof of your identity.

GENERALI enables you to exercise the following rights concerning your personal data:

- Access: obtain your personal data processed by GENERALI.
- Rectification: ask for your inaccurate or incomplete data to be rectified.

- Erasure: ask for your data to be erased when among other reasons they are no longer required for the purposes for which they were gathered.
- Restriction of processing: in certain circumstances you can ask us to restrict our processing of your personal data in which case we will only keep them for the purpose of exercising or defending legal claims.
- Objection: in certain circumstances and due to reasons related to your particular situation, you may object to the processing of your data, in which case we will stop processing them unless we show a compelling legitimate interest or for the purpose of exercising or defending legal claims. You also have the right to object at any time to marketing and/or advertising activities or messages.
- Portability: in certain circumstances, you may obtain your personal data in a structured, commonly used and machine-readable format and transmit those data to another controller when technically feasible.

You may withdraw any consent you may have given at any time. Withdrawal of your consent does not affect the lawfulness of any processing performed on the basis of your consent prior to its withdrawal.

You can learn more about your rights by contacting the Spanish Data Protection Agency at Calle Jorge Juan, 6, 28001 Madrid. You may also submit a complaint to the Agency if you feel that your rights have not been respected.

### **Changes and updates to the privacy notice**

GENERALI may update this privacy notice in whole or in part to reflect changes in applicable privacy laws. Any changes will be notified in accordance with applicable laws and also by posting them on the GENERALI website at <https://www.generali.es/quienes-somos/privacidad>.