

Alfa Vienna Insurance Group Biztosító Zrt.
Üllői út 1, H-1091 Budapest, Hungary

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INTRODUCTION

Please be advised that Alfa Vienna Insurance Group Biztosító Zrt. also concludes group insurance contracts as part of its core activity pursuant to Act LXXXVIII of 2014 on Insurance Activities (Insurance Act). The essence of group insurance is that a contracting party (e.g. a service provider) takes out insurance for the benefit of an insured Party group (e.g. an employer's employees) of their choice from among the types of products covered by group insurance. The persons who are added to the insurance contract are chosen by the contractor, of which they notify the insurer from time to time. The contracting party is in many cases, subject to agreement, also the intermediary of the insurance contract and therefore also the data processor of the insurer.

In order to mediate the contract, the contracting party collects personal data for the insurer, for the conclusion and performance of the insurance contract. The categories of data to be processed are used for the identification of the insured party, the assessment of the health status of the insured party and the contact with the insured party. The data processed are essential for the conclusion of the contract, so if they are not provided, the insurance contract cannot be concluded. Some data are only requested for a service claim notified under an insurance contract, such as when we request health data for the provision of an insurance service in order to assess a claim. To process such sensitive data, we must request your explicit consent, in the absence of which we will not be able to fulfil our service obligations. The insurer will always ask for information for a specific insurance product offer, which is included in the insurer's current forms. The scope of the data included in the forms has been designed to include only the data that are essential to achieve the specific purpose.

To enable you to exercise your right of self-determination with regard to your personal data, we provide the following information:

NAME AND CONTACT DETAILS OF THE CONTROLLER

Controller:

Name: Alfa Vienna Insurance Group Biztosító Zrt.
Registered office: Üllői út 1, H-1091 Budapest, Hungary
Contact: alfa.hu/irjonnekunk

CONTACT DETAILS OF THE DATA PROTECTION OFFICER

E-mail address: adatvedelem@alfa.hu

PURPOSE OF THE PLANNED PROCESSING OF PERSONAL DATA AND LEGAL GROUND OF PROCESSING

Purposes of the processing

The Controller intends to use your personal data

- 1) for the conclusion and execution of the insurance contract, and
- 2) for the purpose of settling insurance claims or legal claims in connection with a contract that has not been concluded.

Legal ground of processing

The Controller processes

- the personal data processed for the purpose under 1) **based on the conclusion and execution of the contract**¹
- the personal data processed for the purpose under 2) – in connection with the enforcement of civil or criminal claims – **based on the legitimate interest of the Insurer**², in relation to which the data subject has the right to object,
- and, if health data are also necessary for the performance of the service covered by the insurance contract, based on the **consent of the data subject**³.

SOURCE OF THE PERSONAL DATA

The data required for the conclusion of a group insurance contract are obtained by the insurer from the contracting party/intermediary by means of the completion and transfer by the contracting party/intermediary of the forms and applications systematically provided by the insurer.

CATEGORIES OF THE PERSONAL DATA

The insurer intends to process natural identification data for the conclusion of the insurance contract, the contact details of the insured party, as well as specific data on health status necessary for the assessment of the insurance risk and the assessment of the claim.

1. Article 6(1) b) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter: Regulation).
2. Article 6 (1) f) of the Regulation.
3. In addition to Article 6 (1) b) of the Regulation, Article 9 (2) a) of the Regulation.

RECIPIENTS OF PERSONAL DATA AND RECIPIENT CATEGORIES

For the conclusion and execution of insurance contracts, the insurer, as controller, uses data processors for processing purposes in the framework of outsourced activities, who perform tasks related to the insurer's activities, such as:

- for mediation and customer information purposes, intermediaries with whom the controller has a legal relationship,
- agents who perform various expert or service tasks, such as benefit managers, claims assessors.

A detailed list of the current outsourcing partners can be found at the alfa.hu/dokumentumok/kiszervezett-tevekenysegek.html site.

DATA TRANSFER TO A THIRD COUNTRY OR TO AN INTERNATIONAL ORGANISATION

There is no data transfer.

AUTOMATED DECISION-MAKING, PROFILING

Please note that we do not apply any automated decision in relation to the processing objectives stated above, profiling is not performed

DURATION OF STORAGE OF PERSONAL DATA

The Insurer intends to process the personal and special data relating to the insurance contract that has not been concluded for as long as a claim can be made in connection with the failure to conclude the contract, i.e. within the five-year limitation period based on the rules governing the statute of limitations.

If the contract is concluded the data are processed during the term of the contract and, if terminated,

- for 20 years following the termination of a life insurance contract,
- for 10 years following the termination

of a non-life insurance contract.

When setting the time periods, we have taken into account the enforceability of any civil and/or criminal claims related to the insurance contract.

RIGHTS OF THE DATA SUBJECT

In relation to your personal data at any time, without limitation:

- you may request information about the details of the processing, including a copy,
- you may request the rectification of inaccurate data,
- you may request erasure,
- you may request restriction of processing if you consider the processing to be unlawful, but do not request erasure, or pending the outcome of a request for data accuracy; or
- you may also object to the processing of your personal data, if the processing of the data is based on the legitimate interests of the Insurer and, in addition,
- you may use the right of data portability.

Based on the right to restriction, we only store the data and do not perform any other operations with the data. With regard to the right to restriction and erasure, please note that in the context of an insurance contract, we need to process data whose processing is necessary for the conclusion of the contract in order to settle a claim. If you request a service of the insurer based on the insurance contract of the person causing the injury, the refusal to supply data can also prevent the detection and assessment of the accurate facts.

In the context of the right to data portability, you may request that we transfer the data you have provided to us in machine-readable format in order to transfer it to another Controller/Processor, provided that the technical and data security conditions are met.

You can lodge a complaint with our company against our data processing at adatvedelem@alfa.hu or at the Hungarian National Authority for Data Protection and Freedom of Information, and you may also bring your case before the court.

Right to submit a complaint to the Supervisory Authority

Address of the authority: Falk Miksa utca 9-11, H-1055 Budapest, Hungary

Postal address of the authority: P.O. Box 9, H-1363 Budapest, Hungary

Address of the website of the authority: www.naih.hu

You can see more information on the rights of data subjects at the website alfa.hu under Privacy.

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