



The Insurer strives to provide information in a clear and easily understandable form and, in accordance with the Supervisory Recommendation, refrains from repeating the legal provisions verbatim. The legal provisions taken into account in the preparation of the Information are as follows:

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation 95/46/EC (hereinafter referred to as: GDPR)
- Act CXII of 2011 on the right to informational self-determination and freedom of information (hereinafter: Infotv.)
- Act LXXXVIII of 2014 on Insurance Activities (hereinafter referred to as: Act)
- Act XLVII of 1997 on the processing and protection of health and related personal data (hereinafter referred to as in English: Eüak.)
- Act V of 2013 on the Civil Code (hereinafter referred to as: Civil Code)
- Act LIII of 2017 on the Prevention and Combating of Money Laundering and the Financing of Terrorism (further amendments in: Pmt.)
- Act LXII of 2009 on Compulsory Motor Vehicle Liability Insurance (hereinafter referred to as: MLI)
- Act C of 2000 on Accounting (hereinafter referred to as: Accounting Act)
- Act XIX of 2014 on the promulgation of the Agreement between the Government of Hungary and the Government of the United States of America on Promoting International Tax Compliance and Implementing FATCA Regulations, and on amending certain related laws (hereinafter: FATCA Act)
- Act XXXVII of 2013 on certain aspects of international administrative cooperation relating to taxes and other public charges (hereinafter referred to as: Actv.)

## 1. DATA CONTROLLER OF PERSONAL DATA

The controller of personal data is SIGNAL IDUNA Insurance Company.

Address and central customer service: 1123 Budapest, Alkotás u. 50.

Postal address: 1519 Budapest, P.O. Box 260.

Phone: 36 1 458 4200

Fax: 36 1 458 4260

E-mail: [adatvedelem@signal.hu](mailto:adatvedelem@signal.hu)

Website: [www.signal.hu](http://www.signal.hu)

Company registration number: 01-10-042159

Tax number: 10828704-2-44

Central Statistical Office number: 10828704-6511-114-01

## 2. Contact details of the data protection officer

You may contact the Insurer's designated data protection officer by post at the address or postal address provided above, or at [adatvedelem@signal.hu](mailto:adatvedelem@signal.hu), for any questions related to the processing of your personal data and the exercise of your rights. \_\_\_\_\_  
by email.

## 3. PURPOSE, LEGAL BASIS, DURATION AND OTHER ESSENTIAL CIRCUMSTANCES OF DATA PROCESSING

We emphasize that we handle your personal data in compliance with the data and privacy protection provisions of the GDPR, the Infotv., the Bit., as well as all other applicable laws and internal regulations.

**Pursuant to Section 135(1) of the Insurance Act, the Insurer is entitled to handle the data of its clients that are classified as insurance secrets and that are related to the insurance contract, its conclusion, registration and service.** Insurance secrets are all data available to the Insurer that are of interest to the Insurer's clients - including the injured party.

also – it concerns your personal circumstances, financial situation, or management, or your contracts with the Insurer.

The Insurer treats personal data provided by the client in any form, including personal data regarding health status, as an insurance secret.

The legal basis for processing personal data necessary for concluding, amending, maintaining the insurance contract, assessing claims arising from the insurance contract, and achieving other purposes specified by the Bit. is, on the one hand, the fulfillment of legal obligations applicable to the Insurer pursuant to Article 6(1)(c) of the GDPR, and, on the other hand, the conclusion and fulfillment of the insurance contract pursuant to Article 6(1)(b) of the GDPR. The laws specified in this information create a legal obligation for the Insurer in connection with concluding, amending, maintaining the insurance contract, and assessing claims arising from the insurance contract.

The Insurer processes personal data only for the period necessary to achieve the purposes of data processing, taking into account the data retention periods required by certain laws and the statutory or contractual limitation period for any claims against the Insurer. The Insurer provides information on the duration of storage of personal data for each data processing purpose.



### 3.1. CONCLUSION, AMENDMENT, MAINTENANCE OF THE CONTRACT, AND JUDGMENT OF CLAIMS ARISING FROM THE INSURANCE CONTRACT

#### 3.1.1. Sale of an insurance-based investment product suitable for the data subject

Purpose of data processing: Before concluding an insurance contract, the Insurer must determine the specific needs and requirements of the given client based on the information received from the client, and must provide the client with objective information in a clear and understandable form in connection with the insurance products, in order to enable the client to make an informed decision. The Insurer is obliged to obtain the necessary information about the client's or prospective client's knowledge of the investment area corresponding to the type of insurance product, his financial situation, loss-bearing capacity, investment objectives and risk tolerance, in order to be able to recommend suitable insurance-based investment products to him.

Legal basis for data processing: Based on Article 6(1)(c) of the GDPR, according to which data processing is necessary for the fulfillment of a legal obligation to which the Insurer is subject. The legal obligation is established by Section 166/E of the Act.

Target group: Future clients and customers of the insurance company

Scope of processed data: Data related to insurance claim assessment

Duration of data processing: In the case of an insurance contract concluded based on a needs assessment, the Insurer processes personal data in accordance with the rules governing the established insurance relationship (see section 3.1.3).

#### 3.1.2. Conducting needs assessments, compliance and suitability tests for life insurance contracts

Purpose of data processing: Before concluding a life insurance contract – with the exception of purely risk life insurance policies without a savings element that are recommended by a financial institution in connection with the financial service it provides or whose insurance amount does not exceed one million forints – the Insurer assesses and specifies the client's needs at least based on the information provided by the client. The Insurer's goal is to recommend the appropriate insurance product.

Legal basis for data processing: Based on Article 6(1)(c) of the GDPR, according to which data processing is necessary for the fulfillment of a legal obligation to which the Insurer is subject. The legal obligation is established by Section 153(1) of the Act.

Target group: Future clients and customers of the insurance company

Scope of processed data: Information necessary to assess and clarify the customer's needs, data necessary for compliance and suitability tests

Duration of data processing: In the case of an insurance contract concluded based on a needs assessment, the Insurer processes personal data in accordance with the rules governing the established insurance relationship (see section 3.1.3).



### 3.1.3. Conclusion and maintenance of an insurance contract

Purpose of data processing: Conclusion, modification and maintenance of the Insurance Contract, as well as the assessment of claims and premiums arising from the insurance contract.

Legal basis for data processing: The Insurer – subject to the provisions of Section 135 (1) of the Act on Insurance – is entitled to process personal data pursuant to Article 6 (1) (b) of the GDPR, according to which data processing is necessary for the conclusion and performance of an insurance contract with the data subject.

Target group: Insurance customers and prospective customers

Scope of processed data: Personal data of the Insurer's clients that are considered insurance secrets and are related to the insurance contract, its creation, registration and service.

- Identity and personal data of the subjects of the insurance relationship (contractor, insured, co-insured, additional insured, beneficiary, injured party, claimant, legal heir, owner, operator): tax identification number, citizenship, permanent address, mother's birth name, type of identification document, number and letter of identification document, family and first name, e-mail address, number and letter of official ID card proving address, mailing address, place of residence in Hungary, mobile phone number, place of birth, date of birth, name at birth, telephone/fax number, title, social security number, death certificate number, gender, date of obtaining driving license, in the case of children, name, address, telephone number, e-mail address, school name, address, student class
- In the case of a personal and liability insurance contract, data related to health status (see data in section 3.1.4)
- Details of the insured, damaged property (see details in section 3.1.8)
- Data related to the assessment of insurance needs: Data necessary for the assessment and evaluation of the client's knowledge and experience, which the client provides by completing the Insurer's needs assessment documents established for this purpose
- Data processed for the purpose of performing customer due diligence as required by the Pmt. (see data in section 3.2.1.)
- Documents generated during official procedures (see data in section 3.2.8)
- Additional data required for payment of premiums and provision of insurance services (see data in section 3.1.8)
- All other material facts and circumstances related to the insurance contract, its creation, registration and service

Duration of data processing: The Insurer will retain your personal data related to the insurance contract for 8 years from the first day of the calendar year following the termination of the insurance contract, in view of the enforcement of any subsequent claims related to the insurance contract and the data retention obligations imposed on the Insurer by law. After the expiry of the deadline, your personal data will be deleted. You prevent the deletion of personal data if:

- litigation is ongoing regarding the contract in question,
- an out-of-court administrative procedure is underway regarding the given contract,
- a complaint is being handled regarding the given contract,
- annuity payment is in progress related to the given contract,
- contingent damages are fixed for the given contract,
- arrears of fees or overpayments recorded in the contract in respect of the given contract,
- in the case of fee-reimbursement contracts.

The Insurer stores your personal data provided during the offer process related to insurance contracts that have not been concluded for the period of limitation specified in the insurance contract from the date of recording the insurance offer, or, failing that, for 5 years from the date of recording the offer in accordance with the provisions of Act V of 2013 on the Civil Code (Ptk.) regarding the general limitation period.

Personal data related to the offer that was not created – calculations left unfinished on online contracting platforms, documents from the needs assessment, compliance and suitability tests in the absence of an offer – will be retained for the 61st day after the last modification.

The Insurer processes personal data processed in the course of fulfilling its customer due diligence obligation set out in Section 6 of the Personal Data Protection Act in accordance with Section 3.2.1.

Please note that although the provision of data is voluntary, the provision of personal data is essential for determining the risk, thus for concluding the contract, maintaining the contract, and assessing the services provided under the contract. The lack of data may result in the rejection of the insurance offer and the impossibility of providing the service. The Insurer's obligation to provide service only arises if you have fully provided the Insurer with the data necessary to establish the occurrence, legal basis, and amount of the service obligation.

If the personal data does not originate directly from the data subject, the party providing the data acknowledges that it has an appropriate legal basis for transferring the data subject's personal data to the Insurer and has provided them with information related to data processing.

The processing of personal data is necessary even after the death of the insured person in order to fulfill the obligations related to the insurance contract and to manage the contract. The rights of the data subject with regard to data relating to the deceased person may also be exercised by the heir of the deceased or the beneficiary named in the insurance contract. The heir of the deceased is obliged to prove this legal status (for example, by sending a certificate of inheritance, a decree of transfer of estate).



### 3.1.4. Management of health data during the conclusion and retention of the insurance contract

Purpose of data processing: Processing of special personal data relating to health status in connection with the conclusion, modification, and maintenance of the Insurance Contract, as well as the assessment of premiums and claims arising from the insurance contract. The purpose of data processing is, in particular, risk assessment and the assessment of service requirements and claims upon the occurrence of an insured event (accident, illness, health impairment, death, use of health insurance services) based on the insurance contract.

Legal basis for data processing: The Insurer, based on Article 9(2)(a) of the GDPR – subject to the provisions of Section 136 of the Personal Data Protection Act and the Personal Data Protection Act – processes personal data relating to health conditions only with the express consent of the data subject. The Insurer obtains the consent in the following form:

- by accepting and signing the General Terms and Conditions and a separate declaration as part of the insurance offer,
- in the case of liability insurance and personal insurance claims, by accepting the data processing declaration on the claim report form and by signing, or in the absence thereof by signing a separate data processing declaration,
- by sending a letter or electronic mail (e-mail) containing the express confirmation of consent to the Insurer,
- by expressly giving consent during a recorded telephone conversation following identification,
- in the event of the death of the policyholder or insured, a separate document signed by the legal heir or the beneficiary specified in the contract in the form of a data management statement.

By giving your consent, you authorize the Insurer to process and record your personal data regarding your health and related personal data that is necessary for the conclusion, modification, maintenance of the insurance contract and the assessment of claims arising from the insurance contract, directly related to them and indispensable.

Please note that since the processing of health data is essential for assessing claims arising from the insurance contract, in particular the occurrence, legal basis and amount of the service obligation, the withdrawal of consent may make it impossible to provide the service.

Target group: Insurance customers and prospective customers

Scope of data processed:

Health-related data: • Data provided on the

Detailed or Simplified Health Declaration during the insurance offer, as well as your answers related medical documents provided by you;

- Additional medical documentation requested by the Insurer, if necessary, provided with your consent;
- Documents of medical examinations required by the Insurer for the conclusion of the insurance contract;
- “Statement regarding the treatment of customers with disabilities” given data;
- Personal data provided during the claim report, relating to the event that triggered the insured event and played a role in its occurrence, documents attached to it, and data requested from social security bodies, healthcare institutions and family doctors and other persons involved in your medical treatment, directly related to the assessment of claims arising from the insurance contract, are essential for this purpose.

Duration of data processing: The Insurer processes health data in accordance with the rules governing the insurance relationship (see section 3.1.3) or until the consent given to data processing is withdrawn - under the conditions mentioned in the Information.

In order to achieve the data processing purpose, it is essential that you authorize the Insurer to obtain, record and use your health-related data from your family doctor, all healthcare institutions, doctors, pharmacists, naturopaths and other persons involved in your medical treatment who have treated you so far, as well as from the National Health Insurance Fund, the social security payment institution, and to forward it to the entitled parties specified in Sections 138-142 and 147-151 of the Health Insurance Act.

It is also necessary that you release the above persons and organizations that are legally authorized to register this data from their obligation of confidentiality, and authorize your family doctor, treating physician, and persons involved in your healthcare to disclose your health and related personal data that they have come to know during your healthcare to the Insurer upon your written request, even in the event of your death.

Please note that although the authorization is voluntary, its provision is essential for accepting the offer and for assessing the services provided under the contract. The lack of authorization may result in the rejection of the insurance offer and the impossibility of providing the service.



### 3.1.5. Group insurance

**Purpose of data processing:** The purpose of the Insurer is to sell group insurance, where the insured are typically employees, members or clients of our partners. The Insurer reconciles the insured's data with the group insurance policyholder.

**Legal basis for data processing:** Article 6(1)(b) of the GDPR, according to which data processing is necessary for the conclusion and performance of an insurance contract with the data subject. The legal basis for the processing of special personal data is Article 9(2)(a) of the GDPR, the express consent of the data subject.

**Affected parties:** Customers of the Insurer

**Scope of data processed:**

- personal data concerning the insurance relationship

**Duration of data processing:** The Insurer processes personal data in accordance with the rules governing the insurance relationship (see section 3.1.3).

We would like to inform you that as a group insurance policyholder, you have the same rights as our individual clients regarding the exercise of your data subject rights regarding the processing of your personal data.

### 3.1.6. Customer service

**Purpose of data processing:** To provide the Insurer's customer service (personal, telephone, e-mail, online) and to serve needs. The Insurer provides assistance in matters concerning the contracts of its customers, as well as in the decision-making of interested and potential customers regarding insurance.

**Legal basis for data processing:** Article 6(1)(b) of the GDPR, according to which data processing is necessary for the performance of the insurance contract, and Article 6(1)(a) of the GDPR, the express consent of the data subject.

**Scope of data subjects:** Natural persons contacting the insurance company's customer service

**Scope of data processed:**

- data necessary for identification
- data included in the request
- audio recording
- contract-related data in order to fulfill a request

**Duration of data processing:** The Insurer will retain the audio recordings for five years from the date of recording the call. The Insurer will process the personal data until your consent is withdrawn or in accordance with the rules governing the insurance relationship (see section 3.1.3).

If you do not consent to us recording your telephone conversation with our staff, please visit our central, personal customer service office, where our colleagues are ready to assist you.

### 3.1.7. Electronic communication

**Purpose of data processing:** The Insurer's purpose is to continue communication related to the management of the insurance contract electronically, to register the documents related to the contract in the online customer Document Library and to send them to you in electronic form through it, in order to provide high-quality and professional service to its customers. The Document Library is automatically opened for customers who choose electronic communication.

**Legal basis for data processing:** Article 6(1)(b) of the GDPR, according to which data processing is necessary for the performance of the insurance contract.

**Affected parties:** Customers of the Insurer

**Scope of data processed:**

- contractor name
- insurance contract policy number
- email address
- mobile phone number

**Duration of data management:** The Insurer retains the personal data necessary for the use of electronic communication, as well as the data logged during the use of electronic communication and the Document Storage system within its framework, for 5 years from the termination of electronic communication in accordance with the provisions of the Civil Code regarding the general limitation period, for the purpose of submitting, asserting and defending legal claims in the Document Storage system.

In order to ensure the proper functioning of electronic communication and to provide professional service to its customers, the Insurer logs events occurring during electronic communication and the use of the Document Library system within its framework, as well as data related to the events (who performed what action, when, and what action) and preserves this log data.



### 3.1.8. Insurance events, damage events, damage management affecting the insurance contract

Purpose of data processing: Handling and paying claims, contacting the claimant for the purpose of handling claims, assessing the legitimacy of the claim and the extent of the compensation required under the contract.

Legal basis for data processing: If the person requesting the service has a contractual relationship with the Insurer, the legal basis for data processing is Article 6(1)(b) of the GDPR, according to which data processing is necessary for the performance of the insurance contract.

If the data subject is not in a contractual relationship with the Insurer – for example: in the case of liability insurance, the injured party is entitled to payment – the legal basis for data processing is Article 6(1)(f) of the GDPR, according to which data processing is necessary for the purposes of the Insurer's legitimate interests.

If the processing of special categories of personal data is necessary for claims management or the assessment of service requests, the legal basis for data processing is Article 9(2)(a) of the GDPR, the express consent of the data subject.

If data processing is necessary to make a compensation proposal or provide a reasoned response to the person entitled to the service as required by law, the legal basis for data processing is Article 9(2)(f) of the GDPR, according to which data processing is the legitimate interest of the data controller in handling claims, asserting or defending legal claims related to the settlement of service claims.

Affected parties: Insurance customers

Scope of data processed:

- the identity and personal data of the subjects of the insurance relationship
- data of the insured or damaged property • other

data that varies per insured property or per claim, but is exclusively necessary for the assessment of claims arising from the insurance contract, in particular the name, address, contact person's telephone number, contact person's e-mail address, policy number, date of the damage event, photographs taken of the damaged property, data recorded during the damage survey, cause of the damage

- loss event and loss history data.

Additional data required for payment of premiums and provision of insurance services:

- insurance premium amount
- amount of insurance paid
- payment time
- bank account number, bank card number
- all documents specified in the GTC, especially in the chapter entitled "Documents required for the payment of insurance services" additional personal data.

Duration of data processing: The Insurer processes personal data in accordance with the rules governing the insurance relationship (see section 3.1.3).

In order to achieve the purpose of data processing, and thus to assess the services provided under the contract, it is essential that you authorize the Insurer to inspect the documents generated during the criminal proceedings initiated in connection with the possible damage case, to request copies of them, and to request information from the authorities in charge. Failure to authorize may result in the rejection of the insurance offer and the impossibility of providing the service.

### 3.1.9. Analysis of insurance events and damage events affecting an insurance contract

Purpose of data processing: By analyzing the documentation related to insurance events and damage events affecting the insurance contract, the Insurer can obtain a more precise overview of individual damage events, in addition to claim settlement, for the purpose of recognizing and preventing fraud and abuse, facilitating cash settlements, and for repair shop and medical management. Based on the data processing, the Insurer can obtain an overview of which service providers (vehicle repair shops, healthcare providers, etc.) it prefers for given events, thereby directing it towards more advantageous service providers, in order to operate more efficiently and provide higher quality service to its customers.

Legal basis for data processing: Article 6(1)(f) of the GDPR, according to which data processing is necessary for the purposes of the legitimate interests of the data controller.

Affected parties: Insurance customers

Scope of data processed:

- damage event data (report, persons involved in the damage event, parts and elements damaged during the damage event, injuries sustained)
- service data (selected service provider, service-related data requests),
- other data necessary for assessing the damage event,
- data on events and claims affecting the insurance contract (see data in section 3.1.8).

Duration of data processing: The Insurer processes personal data in accordance with the rules governing the insurance relationship (see section 3.1.3).



### 3.1.10. Registration of home insurance policies, provision of credit collateral (use of DLT system)

Purpose of data management: To ensure up-to-date, uniform records of home and condominium insurance and credit collateral, to implement the information flow between insurers and credit institutions in the business processes of insurance related to real estate encumbered by mortgage loans based on modern, secure technology, and to significantly improve the turnaround time, as well as to reduce the administrative burden on customers, credit institutions and insurers. The purpose of data management is to process data requests by credit institutions and insurers, as well as data transfers to credit institutions other than insurers, data queries from the DLT system, communication between credit institutions and insurers via the DLT system, initial uploads to the system and mass uploads.

Legal basis for data processing: Legitimate interest pursuant to Article 6(1)(f) of the GDPR: ensuring a simpler data flow between credit institutions and insurers, promoting the prudent operation of credit institutions, simplifying clause processes, and facilitating the control of the provision of credit collateral.

Affected parties: Insurance customers

Scope of data processed:

- Home insurance, credit guarantee clause, clause application, premium arrears insurance data

Duration of data processing: The Insurer processes personal data in accordance with the rules governing the insurance relationship (see section 3.1.3) and in the DLT system for 30 days after the termination of the insurance contract.

Personal data processed using the DLT system may only be accessed by those data controllers for whom it is absolutely necessary. As a general rule, the person responsible for data processing is the person who carried out the data processing, i.e. the person with whom the data subject has a contractual relationship, while the person responsible for responding to the data subject's request is the person to whom the data subject's request was received. The data subject's request must be submitted to the data controller with whom the data subject has a contractual relationship. A unique hash of the personal data is stored in the blockchain within the system, from which the personal data cannot be decrypted and ensures the inviolability of the personal data stored in other components of the system. The list of joint data controllers is contained in the Document Library, available at the bottom of the signal.hu homepage, under the Data Processing Guidelines menu item.



## 3.2. FULFILMENT OF OBLIGATIONS RELATED TO THE CONTRACT

### 3.2.1. Fulfillment of obligations related to the prevention of money laundering

Purpose of data processing: In order to fulfill the customer due diligence obligation set out in Section 6 of Act LIII of 2017 on the Prevention and Combating of Money Laundering and the Financing of Terrorism (Pmt.), the Insurer is obliged to identify its customer (contracting party or beneficiary, beneficial owner, entitled to payment) or its authorized representative in connection with life insurance activities. The Insurer may perform its customer due diligence obligation set out in the law in a manner that is secure, protected, and determined by the supervisory body specified in Section 5 of the Pmt., via a pre-audited electronic communication device, either directly or indirectly (hereinafter referred to as: video identification). The customer may choose between indirect or direct methods of video identification, depending on the customer's decision.

Legal basis for data processing: Based on Article 6(1)(c) of the GDPR, according to which data processing is necessary for the fulfillment of a legal obligation applicable to the Insurer. The legal obligation is established by the Pmt. During the customer screening carried out by means of video identification, the recording of the image and audio recording, the processing of personal data requires the express consent of the data subject pursuant to Article 6(1)(a) of the GDPR and Article 9(2)(a) of the GDPR.

Scope of affected parties: Individual contracting party, in the case of non-individual contracting party, the person authorized to represent the company (manager(s) signing the offer, beneficiary(ies), fee-paying individuals other than the contracting party, in the case of a company, managers authorized to represent the company.

Scope of data processed:

Data processed for the purpose of performing customer due diligence as required by the Pmt.:

- The data required for customer due diligence, which are contained in the documents set up by the Insurer for this purpose, in the customer's declaration (e.g. public figure declaration) within the framework of customer due diligence, as well as a copy of the customer's identity document and a copy of the first page of the address card, a recording of the document pursuant to the Pmt. During direct or indirect electronic customer due diligence, an image and audio recording of the entire working session between the Insurer and its customer, or of the communication that takes place, of the customer and the documents presented by him, the customer's email address, mobile phone number, IP address, answers to customer questions, decision and information regarding the success of identification, and an image and audio recording that records the detailed information of the customer regarding video identification and his express consent to this in a retrievable manner.
- Data from machine functions suitable for interpreting and evaluating content: Document recognition, document detection, reading (MRZ, barcode), face detection, encoding, measurement, sharpness test and liveness test data and evaluation, results of the evaluation.

Duration of data processing: The Insurer shall retain the personal data processed during identification, as well as copies of documents containing such personal data – including personal data processed during video identification – for 8 years from the termination of the insurance contract or the performance of the transaction order, pursuant to Section 56 (2) of the Insurance Act. In the event of the client withdrawing consent during video identification or failure of the client due diligence, the Insurer shall delete the data after recording.

The Insurer records the process of customer due diligence via video identification with images and audio recordings, and during the customer due diligence via video identification, the Insurer takes a picture of the person concerned and his/her documents pursuant to the Personal Data Protection Act. The customer due diligence process via video identification can only be started if the person concerned expressly consents to the recording of the image and audio recording and its processing by the Insurer. If the video identification is unsuccessful for any reason and the repeated indirect customer due diligence is also unsuccessful, the due diligence must be repeated in person.





### 3.2.2. Data processing in the interest of a community of risk

Purpose of data processing: In order to protect the interests of the risk community, the Insurer may contact another insurer in order to perform its obligations under the law or the contract, to provide services in accordance with the law and the contract, and to prevent abuses related to insurance contracts. In the event of contacting other insurers, the Insurer is obliged to provide the requesting insurer with the requested personal data in accordance with the law.

Legal basis for data processing: Based on Article 6(1)(c) of the GDPR, according to which data processing is necessary for the fulfillment of a legal obligation to which the Insurer is subject. The legal obligation is established by Section 149 of the Act on the Protection of Personal Data.

The legal basis for the Insurer's request for data from another insurer is Article 6(1)(f) of the GDPR, according to which data processing is the Insurer's legitimate interest in protecting the interests of the risk community.

Scope of data subjects: Insurance clients, natural persons affected by the request

Scope of processed data: Data related to insurance contracts belonging to sectors specified in the law.

Duration of data processing: The Insurer may process the data obtained as a result of the request for up to ninety days after receipt. If the data obtained as a result of the request is necessary for the enforcement of the Insurer's legitimate interests, the previously specified period of data processing is extended until the completion of the procedure initiated in connection with the enforcement of the claim. If the data obtained as a result of the request is necessary for the enforcement of the Insurer's legitimate interests and the procedure in connection with the enforcement of the claim is not initiated within one year after the data was obtained, the data may be processed for up to one year after the data was obtained.

We inform you that, pursuant to Section 149 of the Insurance Act, the Insurer is entitled to contact another insurer in order to fulfill its obligations under the law or under the contract, to provide services in accordance with the law and the contract, and to prevent abuses related to insurance contracts.

### 3.2.3. Fulfillment of obligations specified in FATCA regulations

Purpose of data processing: The purpose of the Insurer is to conduct an investigation to determine the residency of the Account Holder and Entity under the FATCA Act in accordance with Annex I to the Agreement included in the FATCA Act, in relation to the Financial Account managed by the Reporting Hungarian Financial Institution under the FATCA Act, which falls within the scope of the Bit.

Legal basis for data processing: Based on Article 6(1)(c) of the GDPR, according to which data processing is necessary for the fulfillment of a legal obligation to which the Insurer is subject. The legal obligation is established by the FATCA regulations, including the FATCA Act, and the provisions of Section 148 of the Act.

Scope of affected parties: Insurance account holders, in particular the contracting party and the beneficiary, the new contracting party in the event of a possible amendment, and in the case of legal entities, the persons exercising control (natural persons who are the owners of the legal entity).

Scope of data processed:

- data necessary to fulfill the legal obligation specified in the FATCA law in force at all times

Duration of data processing: The Insurer processes personal data in accordance with the rules governing the insurance relationship (see section 3.1.3).

### 3.2.4. Obligations under the reporting and due diligence of Financial Accounts

Purpose of data processing: Investigation (residency investigation) carried out in relation to Financial Accounts to determine the residency of the Account Holder and Legal Entity according to the Act in accordance with Sections II-VII of Annex 1 of the Act, and to fulfil the obligations specified in the CRS regulations.

Legal basis for data processing: Based on Article 6(1)(c) of the GDPR, according to which the data processing is necessary for the performance of a legal obligation to which the Insurer is subject. The legal obligation is created by the CRS regulation, including, among others, Act CXC of 2015 on the promulgation of the Multilateral Agreement between competent authorities on the automatic exchange of information on financial accounts, and the Act.

Affected parties: Insurance customers.

Scope of data processed:

- data necessary to fulfill the legal obligation specified in the Act in force at all times

Duration of data processing: The Insurer processes personal data in accordance with the rules governing the insurance relationship (see section 3.1.3).



### 3.2.5. Data management related to traffic records kept by the Ministry of the Interior

Purpose of data processing: Data processing related to the provision of data and data requests concerning the road traffic registers kept by the Deputy State Secretariat for the Management of Registers of the Ministry of the Interior. The Insurer is obliged to provide data to the register on the data of the compulsory motor vehicle liability insurance policy, and is entitled to request data from the register in order to enforce its legitimate interest in terms of the data specified in the law for the purpose of concluding, maintaining and amending the insurance contract, insurance events, damage events and claims management concerning the insurance contract.

Legal basis for data processing: Based on Article 6(1)(c) of the GDPR, according to which data processing is necessary for the fulfillment of a legal obligation applicable to the Insurer. The legal obligation is created by the Kknny. The automatic query from the register by the Insurer in order to conclude the contract requires the express consent of the data subject pursuant to Article 6(1)(a) of the GDPR.

Target group: Insurance customers and prospective customers

Scope of data processed:

- Data necessary to fulfill the data provision obligation specified in the Public Registry, or data affected by the data request according to the data content of the register

Duration of data processing: The Insurer processes personal data in accordance with the rules governing the insurance relationship (see section 3.1.3).

### 3.2.6. Fulfillment of obligations related to compulsory motor vehicle liability insurance

Purpose of data management: Fulfillment of the obligations specified in the Gfbt., obligation to provide data to the body managing the policy and claims registers, and request data from the policy and claims registers.

Legal basis for data processing: Based on Article 6(1)(c) of the GDPR, according to which data processing is necessary for the fulfillment of a legal obligation to which the Insurer is subject. The legal obligation is established by the Hungarian Insurance Act. The Insurer's occasional request for data concerning the register in the interest of concluding a contract requires the express consent of the data subject pursuant to Article 6(1)(a) of the GDPR.

Target group: Insurance customers and prospective customers

Scope of data processed:

- data necessary to fulfill the legal obligation specified in the Gfbt. in force at all times

Duration of data processing: The Insurer processes personal data in accordance with the rules governing the insurance relationship (see section 3.1.3).

### 3.2.7. Fulfillment of the obligation to retain accounting documents

Purpose of data processing: Fulfillment of the obligation to preserve accounting documents.

Legal basis for data processing: Based on Article 6(1)(c) of the GDPR, according to which data processing is necessary for the fulfillment of a legal obligation applicable to the Insurer. The legal obligation is established by Section 169 of the Insurance Act.

Affected parties: Insurance customers

Scope of data processed:

- documents constituting accounting documents

Duration of data processing: The Insurer processes personal data in accordance with the rules governing the insurance relationship (see section 3.1.3).



### 3.2.8. Complaints handling

Purpose of data processing: The Insurer, in compliance with the provisions of Section 159 of the Insurance Act, ensures that the client and consumer interest representation bodies can submit their complaints regarding the conduct, activities or omissions of the Insurer, the agent employed or commissioned by it or – in relation to a given product – the person performing supplementary insurance brokerage activities commissioned by it, orally (in person, by telephone) or in writing (in person or by document delivered by another person, by post, by fax, by electronic means).

Legal basis for data processing: Based on Article 6(1)(c) of the GDPR, according to which data processing is necessary for the fulfillment of a legal obligation to which the Insurer is subject. The legal obligation is established by Section 159 of the Act on the Protection of Personal Data.

Affected persons: Persons filing a complaint with the Insurer

Scope of data processed:

Personal data provided during complaint handling:

- complainant's personal identification data
- data of those affected by the complaint
  - subject of complaint
- all information and personal data provided during the complaint process
- power of attorney
  - data necessary to investigate and respond to a complaint • data recorded for later identification: telephone number, place of call initiation, contract policy number, exact time of call.

Duration of data processing: The Insurer will retain the complaint, the response to it and the recorded audio recording for 5 years pursuant to Section 159 (3) of the Act on the Protection of Personal Data.

### 3.2.9. Performing tasks related to official requests and procedures

Purpose of data processing: Responding to official inquiries concerning the insurance relationship and facilitating the conduct of procedures

Legal basis for data processing: Based on Article 6(1)(c) of the GDPR, according to which data processing is necessary for the fulfillment of a legal obligation applicable to the Insurer. The legal basis for data processing is the provisions of the Civil Code, the Civil Procedure Code and relevant legislation.

Scope of data subjects: Insurance clients, natural persons affected by an official request

Scope of data processed:

Documents generated during official procedures:

- Personal data provided on documents used for this purpose for official procedures
- To assess the service under the insurance contract (in particular: exemption or excluded risks, gross negligence- (intentionality, intentionality) necessary personal data
- Data contained in documents that may also contain criminal personal data – e.g. police report, decision, court decision, expert opinion

Duration of data processing: The Insurer processes personal data in accordance with the rules governing the insurance relationship (see section 3.1.3).

The Insurer has performed the so-called balancing of interests tests required for the application of the legitimate interest legal basis pursuant to Article 6(1)(f) of the GDPR with regard to the processing of the data of the data subject, which can be found in the Document Library available at the bottom of the homepage of [www.signal.hu](http://www.signal.hu), under the Data Processing Guidelines menu item.

## 4. ACCESS TO PERSONAL DATA, DATA TRANSFER

Pursuant to Section 135 (3) of the Insurance Act, the owners, managers, employees of the Insurance Company and all those who have access to it in any way during their activities related to the Insurance Company are obliged to maintain confidentiality regarding insurance secrets without any time limit – unless otherwise provided by law.

All persons or organizations against whom the Insurer is not obliged to maintain insurance secrecy pursuant to Sections 138-143 and 147-151 of the Insurance Act are also entitled to access the data considered as insurance secrets. The itemized list is a mandatory content element of the insurance information according to Annex 4 of the Insurance Act on "Informing Customers", and is included in the chapter "Provisions on Insurance Secrets" of the general terms and conditions.

Personal data may be accessed by the Insurer's employees and dependent insurance intermediaries with access rights related to the purpose of data processing, and, if the mandate agreement between the broker and the client authorizes this, by the broker insurance intermediary, or by persons and organizations performing data processing or outsourced activities for our company based on service contracts. Access is permitted to the extent strictly necessary for the performance of the activity. Dependent insurance intermediaries mandated by the Insurer are also considered data processors.



In the event of a claim arising from liability insurance related to property insurance, the Insurer shall, within the framework of providing data to the Insured, transfer to the Insured the personal data directly related to the compensation and amount of the claim and which are absolutely necessary – in particular, their name, address, policy number – to the Insured. The purpose of the transfer of data is to enable the Insured to claim the deductible deducted from the claim amount directly from the Insured.

In the event of the data subject's objection to the data processing related to the use of the DLT system, the Insurer will remove the data subject from the scope of data provision to be shared within the framework of the DLT system, as regards the registration of the relevant home insurance policies and the provision of credit collateral, until the data subject gives his/her consent to the data transfer. The data subject's consent may be given in a procedure prior to the introduction of the DLT system, such as in the Pledgee's Declaration, which is part of the insurance offer, or in any other manner that ensures the subsequent verifiability of the consent.

In the event of any change in the identity of the insurance intermediary during the insurance relationship, the Insurer is entitled to transfer the client's data to another dependent insurance intermediary in a dependent insurance intermediary relationship with it for the purposes specified in this Information.

The list of data processors used by the Insurer in the processing of personal data – taking into account the outsourcing guarantees – and the description of the activities they perform can be found in the Document Library available at the bottom of the signal.hu homepage, under the Data Processing Guidelines menu item.

Based on the contract concluded with the Insurer, the data received from the Insurer may be used exclusively for the purposes necessary for the performance of the outsourced data processing activity. Those performing the outsourced activity are obliged to comply with the legal regulations on data and confidentiality protection. The obligation, responsibility and measures to be taken to maintain the insurance secret are also ensured by the contract concluded with them.

If it is essential for the performance of the service included in the contract, the Insurer will transfer your personal data to a third country in order for you to receive healthcare or use services in a third country.

## 5. DATA SECURITY MEASURES

The Insurer ensures the security of data and takes all technical and organizational measures necessary to enforce the relevant legal provisions, in particular to meet the data security requirements set out in Article 32 of the GDPR. As part of this, the Insurer develops procedural rules that ensure that the data recorded, stored and processed are protected and prevent their destruction, unauthorized use and unauthorized modification. The Insurer further ensures the closed and comprehensive protection of IT systems storing personal data by fully considering and complying with the provisions of sectoral legislation and the recommendations of supervisory bodies. The Insurer ensures the regular monitoring, continuous maintenance and development of the IT control framework in accordance with the provisions of sectoral legislation.

The Insurer ensures that unauthorized persons cannot access, disclose, transmit, modify or delete the processed data.

The Insurer will do everything in its power to ensure that the data is not damaged or destroyed. The Insurer also requires the above commitment from its employees involved in its data management activities and from data processors acting on behalf of the Insurer.

We would like to inform you that even with the modern technical and organizational measures applied by the Insurer, it cannot be ruled out that a data protection incident affecting your personal data and insurance secrets may occur. The Insurer will inform the data subjects about the data protection incident – if it is obliged to inform the data subjects pursuant to the legal provisions – by means of a notification on its official website and/or by letter.

## 6. PROCESSING OF CHILDREN'S PERSONAL DATA

The Insurer is aware that children's personal data deserve special protection, as they may be less aware of the risks, consequences and associated guarantees and rights associated with the processing of personal data. The legal declaration of a minor with limited legal capacity requires the consent of his/her legal representative - unless otherwise provided by law. The legal declaration of a minor without legal capacity is null and void; his/her legal representative acts on his/her behalf. The Insurer processes the personal identification and contact details of the minor's parent or guardian in order to enforce the above requirements.

The processing of personal data in relation to information society services offered directly to children is lawful only if and to the extent that the consent has been given or authorised by the person exercising parental responsibility over the child. The Insurer is entitled to verify the authenticity of this and may request further statements in the event of unfoundedness.



## 7. AUTOMATED DECISION-MAKING, PROFILING

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. The Insurer shall also have the right to make a decision based solely on automated processing of the data subject's personal characteristics, if this is necessary for the conclusion or performance of an insurance contract between the data subject and the Insurer, or if the data subject has given his or her explicit consent.

Profiling is any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal characteristics relating to a natural person, in particular to analyse or predict characteristics relating to performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

During the customer screening process using video identification, the Insurer checks and evaluates the creation of the customer's image in addition to functions based on artificial intelligence. This includes checking that the Customer appearing at the remote location as the subject of the screening is a real, live person, that the online screening system is used personally in real time, and that the live image has not been manipulated. During the indirect electronic customer screening, machine functions suitable for interpreting and evaluating the content are applied: document recognition, document detection, reading (MRZ, barcode), face detection, coding, comparison, sharpness test and liveness test data and evaluation, and the results of the evaluation. During the customer screening process, the results of the examination are evaluated based on the data provided by the customer using machine functions. During the indirect electronic customer due diligence process, the Insurer compares the photograph of the customer and the image in the official identification card suitable for proving identity using the audited electronic communication device.

The Insurer uses automated decision-making and profiling as follows: The Insurer may use

automated decision-making to accept an insurance offer and conclude a contract in the course of risk assessment and indexing based on the terms and conditions of the contract. The Insurer evaluates the data contained in the offer and the contract based on risk and other business considerations, a decision based on which may affect the acceptance or rejection of the offer or the premium for insurance coverage.

In the event of a claim report related to residential property and motor vehicle products on the claim reporting interface on its website, the Insurer may automatically check the insurance coverage and, based on the check, may reject the report, of which it will notify the reporter.

When concluding insurance contracts, including the needs assessment and suitability tests, the Insurer evaluates the information provided by the data subject using IT tools, in the course of which it creates a profile of the data subject and, based on this, makes a recommendation for the product that best suits the data subject's needs.

The Insurer carries out profiling for the purpose of risk assessment in order to predict the customer risk affecting the insurance contract, on the basis of which the insurance offer made is accepted, may be modified or rejected, and for the purpose of preventing and investigating fraud based on information that may significantly indicate the possibility of fraud occurring.

When analyzing insurance events, claims and related documentation affecting the insurance contract, the Insurer evaluates personal data using functions based on machine learning and artificial intelligence, and creates individual data subject profiles, thereby filtering out the occurrence of abuse and directing customers to the appropriate service provider for more efficient operation.

These functions include, among others, matching with known suspects, comparing certain claims with previous patterns, data on payment acceptance of offers and data on previous services performed by service providers, different clusters of comparable damages during services, machine learning based on past experiences with service providers, examining damage and service provider estimated repair cost data.

The Insurer will inform the data subjects about any further automated decision-making or profiling carried out by it in the data processing information related to the given data processing.

In the event of a decision related to automated data processing, the Insurer provides you with the opportunity to request human intervention, express your position and file an objection to the decision, using any of the contact details provided in this Notice.



## 8. RIGHTS RELATED TO DATA PROCESSING AND THEIR EXERCISE

Under the law, you have the right to request access to your data, rectification, erasure or restriction of processing at any time, you can object to the processing of your personal data, and you have the right to receive your data in a portable format.

You can submit your request regarding the processing of your personal data to our company orally (in person) or in writing (in person or by document delivered by another person, or by post, fax or electronic mail), at the following contact addresses:

Central customer service address: 1123 Budapest, Alkotás u. 50.

Postal address: 1519 Budapest, P.O. Box 260.

Customer service phone number: +36 1 458 4200

Fax: 06 1 458 4260

E-mail: adatvedelem@signal.hu

We will review your application for the enforcement of your rights as soon as possible after submission, but no later than 25 days, and we will notify you of our decision in writing or, if you submitted the application electronically, electronically!

The Information further summarizes the essential information regarding these rights. In accordance with the supervisory recommendations, the Information refrains from repeating the full and verbatim version of the legislation. The detailed rules are contained in Chapter III of the GDPR, entitled "Rights of data subjects", and in the Infotv.

### 8.1. RIGHT OF ACCESS

At your request, we will provide you with information in writing – including, where applicable, electronically – in a clearly understandable manner about whether your personal data is being processed, as well as information related to data processing, in particular, the purpose of data processing, the personal data processed, the recipients to whom your data has been transmitted, the planned period of storage of personal data, and information related to automated decision-making.

The Insurer shall provide the information and action free of charge. If the request is manifestly unfounded or excessive, in particular due to its repetitive nature, the data controller, taking into account the administrative costs involved in providing the requested information or communication or taking the requested action:

- a) charge a reasonable fee, or
- b) may refuse to take action on the request.

The burden of proving that the request is clearly unfounded or excessive shall be on the Insurer.

The Insurer will provide you with a copy of the personal data that is the subject of the data processing. For additional copies, the Insurer may charge a reasonable fee based on administrative costs.

If you have submitted your request electronically, the information must be made available in a widely used electronic format, unless you request otherwise.

### 8.2. RIGHT TO CORRECTION

The Insurer will take all reasonable measures to immediately delete, correct or supplement personal data that is inaccurate or incomplete for the purposes of data processing.

If the personal data is not accurate and accurate personal data is available, the data must be corrected. If accurate or additional data is not available, the Insurer will make the correction and addition by means of an additional statement.

In order to maintain data accuracy, you agree to report any changes to your data within 5 working days by one of the following methods: e-mail: info@signal.hu, telephone: 06 1 458 4200, fax: 06 1 458 4260, postal address: SIGNAL IDUNA Biztosító Zrt. 1519 Budapest, Pf. 260., or in person at the central customer service office of the Insurer. The Insurer is entitled to call on you, in justified cases, to provide proof of the revised data to the Insurer in an appropriate manner – primarily by means of a document.



### 8.3. RIGHT TO DELETION (RIGHT TO BE FORGOTTEN)

The Insurer will delete the personal data without undue delay - subject to the deletion requirements set out in this Notice - if the purpose or legal basis for the processing has ceased to exist, you object to the data processing, or for any other reason the data processing is unlawful.

Deletion may be refused if the processing is necessary for the purpose of fulfilling an obligation under EU or Member State law applicable to the Insurer requiring the processing of personal data, or for the establishment, exercise or defence of legal claims.

If the Insurer has made the personal data to be erased public, taking into account available technology and the cost of implementation, it will take reasonable steps to inform the data controllers processing the data that you have requested the erasure of links to the personal data in question or of copies or replications of these personal data.

### 8.4. RIGHT TO RESTRICTION OF DATA PROCESSING

The Insurer restricts data processing if one of the following applies:

- a) You dispute the accuracy of the personal data;
- b) the processing is unlawful and you oppose the erasure of the data and instead request the restriction of its use;
- c) the Insurer no longer needs the personal data for the purposes of data processing, but you require them for the establishment, exercise or defense of legal claims; or
- d) You have objected to the processing of your data.

If your request for rectification, restriction or erasure cannot be fulfilled, we will inform you in writing within 25 days of receipt of the request about the rejection of the request, including the factual and legal reasons for it.

### 8.5. RIGHT TO OBJECT

You have the right to object to the processing of your personal data necessary for the purposes of the legitimate interests of the Insurer or a third party. You also have the right to object to the use of your personal data for direct marketing purposes, including profiling.

Personal data may no longer be processed for this purpose unless the Insurer demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or which are related to the establishment, exercise or defence of legal claims.

### 8.6. RIGHT TO DATA PORTABILITY

You have the right to receive the personal data concerning you, which you have provided to the Insurer, in a structured, commonly used and machine-readable format, where this is technically feasible, where the processing is based on consent or a contract and the processing is carried out by automated means. The right to data portability under this point does not create an obligation for data controllers to implement or maintain technically compatible data processing systems.

### 8.7. RIGHT TO WITHDRAW A CONTRIBUTION

You have the right to withdraw your consent to the processing of your personal data. The withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal.

**We would like to reiterate that if the processing of personal data is essential for the assessment of the services provided under the contract, the withdrawal of consent may make it impossible to provide the service.**

### 8.8. RIGHT TO AUTHORISED LEGAL REMEDY

You have the right to initiate an investigation by the supervisory authority if, in your opinion, the Insurer restricts the enforcement of your rights related to your personal data or rejects your request to enforce these rights, or if you consider at any time that a violation of the law has occurred in connection with the processing of your personal data or there is an immediate risk of such a violation.





Contact details of the Hungarian National Data Protection and Freedom of Information Authority:

Headquarters: 1055 Budapest, Falk Miksa Street 9–11.

Mailing address: 1363 Budapest, P.O. Box: 9.

Phone: +36 1 391 1400

Fax: +36 1 391 1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Web: [naih.hu](http://naih.hu)

#### **8.9. RIGHT TO COURT REMEDY**

In addition to the above, you have the right to a judicial remedy at any time against a legally binding decision of the supervisory authority concerning you, and if the competent supervisory authority does not deal with the complaint or does not inform you of the procedural developments related to the complaint submitted or its outcome within three months. You may also apply to court if, in your opinion,

the Insurer or a data processor acting on its behalf or on its instructions processes your personal data in violation of the provisions on the processing of personal data set out in law or in a binding legal act of the European Union.

You may also initiate the lawsuit – at your choice – before the court competent for your place of residence or residence.

#### **9. AVAILABILITY AND MODIFICATION OF THE INFORMATION**

The Insurer publishes the current Notice on its website and in its customer service offices. The Insurer reserves the right to amend the Notice, of which it will notify the data subjects in due time via its website ([www.signal.hu](http://www.signal.hu)).