

Privacy Notice

The purpose of this privacy notice is to explain how, and for what purposes, we use your Personal Data. Please read this privacy notice carefully.

Which legal entity will use Your personal data?

The data controller is your Insurer, Europ Assistance S.A. is a French limited company governed by the French Insurance Code, with headquarter at 2 rue Pillet-Will, 75009 Paris, France. The company is registered in the Paris Commercial and Companies Registry under number 451 366 405. It is underwriting this Policy through its Europ Assistance S.A. UK Branch, having its principal place of business 55 Mark Lane, London, EC3R 7NE.

If you have any questions about the processing of your personal data or if you want to exercise a right regarding your personal data, please contact the data protection officer at the following contact details: Europ Assistance S.A. 2 rue Pillet-Will, 75009 Paris, France
Email: EAGlobalDPO@europ-assistance.com

How do We use Your personal data?

We collect and process your personal data for different purposes.

To execute your contract, we process your personal data to:

- underwrite insurance and manage related risks,
- perform eligibility checks,
- administer Your insurance Policy, and
- manage Your claims and complaints.

To fulfil our legitimate interests to protect and develop our business, we may also process your personal data to:

- perform fraud prevention and management or/and prevent irregularities,
- conduct and manage customer satisfaction surveys and checks, and
- continuously improve the efficiency and the rapidity of Our claim management system (e.g. perform analytics, improve the user experience; debug and conduct research; provide customer service and training).

We perform a balance of interests to ensure that we carry on such processing activities in compliance with the General Data Protection Regulation.

Finally, we may have to process your personal data to comply with legal obligations in relation to:

- fight against money laundering,
- fight against the financing of terrorism,
- international economic and financial sanctions.

Which personal data do We use?

We process only personal data that is strictly needed for the above purposes. In particular, we will process:

- name, contact details, and identification documents (for example, passport),
- bank details,
- any document you provide to us to handle your claim.

Sensitive personal data



When we process sensitive personal data, such as health data, which requires higher levels of protection, we are required to have further legal grounds for collecting, storing and using this type of personal data. We justify our use of sensitive personal data using one or more of the following additional lawful bases:

- **Consent:** You have consented for us to use collect and process your sensitive personal data.
- **Protection of vital interests of you or another person, where you are unable to consent:** processing is necessary to protect the vital interests of you or of another natural person where You are physically or legally incapable of giving consent.
- **Legal claims:** where your information is necessary for us to establish, defend, prosecute or make a claim against you, us or a third party.
- **In the substantial public interest:** where the processing activity is necessary for reasons of substantial public interest, on the basis of EU/UK or other local law (as applicable).

Who do we share your personal data with?

We may share your personal data with other Europ Assistance and Generali Group subsidiaries and external organizations such as our auditors, reinsurers, co-insurers, claims handlers, agents, and distributors that from time to time need to provide the services covered by your policy and other bodies that carry out technical, organizational and operational activity supporting the insurance.

In some of these instances, the organisation in question may considered to be a data controller (not acting on our instructions) and will be primarily responsible for deciding how your personal data is held and used once shared by us, providing the appropriate information notices and obtaining consent (where applicable).

We will also share certain relevant information about your complaint (e.g. complaint status, type, reason) with AMERICAN EXPRESS to the extent that such information is needed to adequately perform the contract AMERICAN EXPRESS has with you.

Why is your personal data is required?

We collect and process your personal data mainly to fulfil our contractual obligations with you, but also for wider reasons such as to comply with our legal obligations and/or for our legitimate business interests set out above. If you choose to not provide us with your personal data, we may not be able to go ahead with the contract and provide the relevant services.

Where do we transfer your personal data?

We may transfer your personal data to countries, territories or organizations that are outside the European Economic Area (EEA) or the UK and are not recognised as ensuring an adequate level of protection. If this happens, the transfer of your personal data to non-EEA/ non-UK organisations will take place in compliance with appropriate and suitable safeguards in line with applicable law. We will generally rely on the EU Standard Contractual Clauses (together with the UK International Data Transfer Addendum, where applicable). You have the right to obtain information and, where relevant, a copy of the safeguards we adopt for such transfers by contacting the data protection officer.

What are your rights regarding your personal data?

You can exercise the following rights regarding your personal data:

- **Access** – You may request access to your personal data.
- **Rectify** – You may ask us to correct personal data that is inaccurate or incomplete.
- **Erase** – You may ask us to erase personal data if one of the following grounds applies:
 - a) The personal data are no longer necessary for the purposes for which we collected or otherwise processed them.



- b) You withdraw consent for the purpose of the processing and there is no other legal reason for the processing.
 - c) You object to automated decision-making and there are no overriding legitimate grounds for our processing, or you object to our processing for direct marketing.
 - d) We have processed your personal data unlawfully.
 - e) We should erase Your personal data to comply with our legal obligations under European Union or Member State law to which we are subject.
- **Restrict** – You may ask us to restrict how we process your personal data where one of the following applies:
 - a) You contest the accuracy of your personal data, for a period until we can verify their accuracy.
 - b) The processing is unlawful and you oppose the erasure of the personal data and request restriction of their use instead.
 - c) We no longer need the personal data for processing, but You want the personal data to establish, exercise or defend legal claims
 - d) You object to processing under the right to object to automated decision-making, and you ask us to restrict our use until we have verified whether we have legitimate grounds to override your right to object.
 - **Portability** – You may ask us to transfer your personal data to another organisation or ask to receive your personal data in a structured, commonly used and machine-readable format.
 - **Object** – When we process your personal data to fulfil our legitimate interest, including for direct marketing purposes, you have the right to object to such processing of your personal data and request us to stop these processing activities.
 - **Withdraw consent** – You may withdraw your consent, at any time, for the processing of your personal data for which you have provided consent before. If you withdraw your consent, we might no longer be able to proceed with your claim.

You can exercise your rights by contacting our data protection officer at:
EAGlobalDPO@europ-assistance.com

You may exercise your rights free of charge unless your requests are plainly unfounded or excessive.

Which are your rights if we use automated decisions-making processes?

To handle your claim and get back to you more rapidly, we are using a claim management system that scans and analyses the content of your claim and the supporting documents. The assessment of your claim is therefore fully automated and there is no human intervention in the decision-making process. Based on the reading and interpretation of the supporting documents you provided, the claim management system will assess whether your claim meets the terms and conditions of your policy and whether to accept or reject your claim, in full or in part.

We regularly audit our claim management system to ensure it remains fair, effective and accurate. In all cases, you have the right to obtain an explanation of the decision regarding your claim, challenge it and request that one of our operators reviews the decision manually. To do so, you can call at +44 (0)1273 696 933, as you can always do for manual claims handling.

We will also use your personal data to continuously improve the efficiency and the rapidity of our claim management system. You have the right to ask us not to use your personal data for this specific purpose.

How can you make a complaint?

If you are not satisfied of the answers we provided to you, you have the right to complain to the supervisory authority whose contact information is below:





French Authority:

Commission Nationale de l'Informatique et des
Libertés (CNIL)
3 Place de Fontenoy
TSA 80715
75334 PARIS CEDEX 07
France
www.cnil.fr



UK Authority:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire, SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745
(national rate)

Web: <https://ico.org.uk/>

How long do we retain your personal data?

We will retain your personal data for as long as is necessary for the purposes set out above, or for as long as the law requires.

