

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

B. Data subjects

For data protection purposes, this information notice is addressed to GENERALI customers whose personal data are processed. Data subject means any individual who has a contractual relationship with GENERALI under which rights and/or obligations may arise as a result of the wording of the contract for the specific product.

Specifically, data subject includes but is not limited to:

- Policyholder: an individual who takes out the insurance with the insurer and undertakes to pay the premium. The policyholder may also be the insured or they may be different people.
- Insured: an individual who is the owner of the insured interest covered by the policy.
- Beneficiary: an individual designated by the policyholder.
- Legal representative of the legal entity.
- Beneficial owner of the legal entity.

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: performance of the contract

- a. Complete this policy to determine the coverage provided under this insurance contract, payment of the sum insured whether in the form of income or as a lump sum, specify the possibility of surrender and the grounds and expiry date of the policy.
- b. Manage, maintain and control the contractual relationship which includes charging premium payments, processing amendments and extensions to this policy and where applicable transfer to other assured pension plans or individual long-term savings insurance plans.

This processing may involve automated individual decision-making, including profiling, through statistical and actuarial analysis to establish your risk profile pursuant to 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.

- c. Send messages related to this policy to tell you about the status of your insurance and the tools GENERALI makes available to you as part of managing the contractual relationship and for the sole purpose of enabling you to exercise your rights under this policy.
- d. Carry out any verifications and investigations required to determine and where applicable pay compensation to the insured, the beneficiary or the injured party and the provisions for claims.
- e. 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.
- f. In the case of the #My Pocket product available on the MiGenerali app, enable you to access the savings service which is additional to your insurance policies. This will include processing your data and information from your bank account(s) for the sole purpose of checking your banking transactions to turn on the savings rules you have previously set up. GENERALI will not be able to access your bank accounts or process your login details or passwords for these accounts. This will be done solely by the payment institution MORPHEUS AIOLOS, S.L., Tax Identification Code (CIF) B-86556420 and registered address at Calle de San Andrés 8, Madrid, to which you have previously given your express consent.

ii. Lawful basis: compliance with a legal obligation

- a. Regularly assess the suitability or appropriateness of the insurance product taken out to ensure it meets your requirements and needs at all times and provide you with information on all costs, related charges and return of the investment pursuant to Directive (EU) 2016/97 of the European Parliament and of the Council of 20 January 2016 on insurance distribution.
- b. Handle the resolution of any complaints and disputes between policyholders, insured parties, beneficiaries, injured third parties or the successors-in-title of any of them with GENERALI pursuant to section 97 of the Organisation, Supervision and Solvency of Insurers and Reinsurers Act 20/2015 of 14 July.
- c. To comply with the legal obligations regarding pricing and analysis of the insured risks applicable to GENERALI, in accordance with the provisions of Organisation, Supervision and Solvency of Insurers and Reinsurers Act 20/2015 of 14 July, by processing the data necessary to carry out their assessment based on the criteria applicable depending on the insurance contracted.
- 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.

As part of this compliance, GENERALI may send a strictly necessary set of your personal data to Assicurazioni Generali S.p.A., the parent company of the Group, to help meet the legal and regulatory obligations relating to the Generali Group.

- e. Keep the accounting ledgers required by the Code of Commerce and other regulations applicable to them as well as records of accounts, claims, technical provisions, investments, reinsurance contracts and policies, endorsements and cancellations made pursuant to section 96 of Royal Decree 1060/2015 of 20 November on the organisation, supervision and solvency of insurers and reinsurers.
- f. 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.
- g. Comply with obligations under anti-money laundering and counter-terrorist financing regulations and apply the due diligence measures required under these regulations.
- h. Disclose to Assicurazioni Generali SpA, its parent company, and other Generali Group companies in compliance with anti-money laundering and counter-terrorist financing regulations the personal data needed to apply the due diligence measures set out in these regulations. To this end and pursuant to applicable personal data protection regulations, Assicurazioni Generali SpA and Generali Group companies have specified their responsibilities in relation to this processing of personal data through a Joint Controllers Agreement, whose key components are sharing the personal data of customers which are necessary in accordance with the above regulations and following the same procedures, using a common platform to process the personal data of these customers and implementing appropriate organisational and security measures to ensure data security.

If a customer exercises their data protection rights in relation to the previous paragraph, the Generali Group company is required to consider and process the request to the extent allowed by applicable data protection and/or anti-money laundering and counter-terrorist financing regulations. The Generali Group company that has entered the customer's information into the shared platform will be responsible for meeting the request. Section "I. Data protection rights" of this document provides information on how you can exercise your rights under applicable legislation.

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

- a. Undertake marketing and/or advertising actions or messages and conduct loyalty programmes, competitions or other types of promotions, including managing incentives and prizes, by any means including electronic or equivalent messages related to products or services similar to those taken out with GENERALI in compliance with section 21(2) of the Information Society and Electronic Commerce Services Act 34/2002 of 11 July and Circular 1/2023 of 26 June on the application of section 66(1)(b) of the General Telecommunications Act 11/2022 of 28 June concerning making calls for the purposes shown above.

Actions and messages may be undertaken on the basis of profiling performed by GENERALI to find out which products and services best suit your profile and thus send you personalised offers.

- b. Conduct satisfaction and quality surveys related to GENERALI's products and services together with statistical surveys and market research to assess your satisfaction with a view to enhancing processes and services related to compliance with GENERALI's obligations.
- c. 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.
- d. 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.
- e. Use of your identification data for handling claims in which you are involved as a third party to expedite the handling of the claim and optimise the quality of the data in our systems.
- f. Exercise or defence of GENERALI's rights in court together with those of its officers, representatives and shareholders in the event of disputes.
- g. Intra-group transfer: intra-group exchange of information between insurers to meet supervisory obligations, optimise IT resources and for other administrative purposes.
- h. Perform statistical and analytical activities to:
 - Assess and report on the performance of contracts and portfolios.
 - Carry out control activities.
 - Assess risk indicators.
 - Oversee operational effectiveness.
 - Improve our insurance products, services, processes and assets.
- i. Share a limited and strictly necessary set of your personal data with Assicurazioni Generali S.p.A., our parent company in the Generali Group. This enables them to perform statistical and analytical activities, such as business intelligence or key performance indicator (KPI) analysis, to support the Generali Group's strategic coordination, planning, control and supervision.
- j. GENERALI may send your personal data to Assicurazioni Generali S.p.A., the parent company of the Group, to enhance services, products, statistics and analyses using new technological solutions.

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. In the case of the #My Pocket product available on the MiGenerali app, offer you other GENERALI products and services through marketing and/or advertising actions or messages by any means including electronic or equivalent messages.

The products and services we offer you are based on your payment information, but only to the extent strictly necessary to identify the purchase of third-party products or services similar to those offered by GENERALI so that we can offer you more favourable terms. Your payment information will not be used for any other purpose, including analysis of consumer habits or marketing profiling for the purpose of sending you marketing messages.

Your consent is not mandatory for performing insurance contracts and you are therefore free to give us your consent to send you electronic messages or not without this affecting your contractual relationship with us. If you do give us your consent, you may withdraw it at any time at no additional cost or disadvantage to you.

- b. Processing personal data to make marketing offers for services and products from other Generali Group companies and third parties provided that the data subject has opted in and using any means of communication. Actions and messages may be undertaken on the basis of profiling performed by GENERALI to find out which products and services best suit your profile and thus send you personalised offers.

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 contract, specially protected data (such as health data where needed), login details, usernames, codes, etc. which you use in your relationship with us, 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.

Your payment account information for the My Pocket product is provided by MORPHEUS AIOLOS, S.L., which you have authorised to provide us with your personal data. This company is the data controller for your personal data and discloses them to GENERALI based on the

authorisation you have given to enable us to bring you the round-up savings service. These personal data are necessary to deliver the service through My Pocket, which means that if you do not share them with us we will not be able to provide you with this service.

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 your contractual relationship 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:

- Generali Group companies.
- Insurers, co-insurers and reinsurers.
- Banks and financial institutions.
- Advertising opt-out systems.
- Providers of professional services covered or requested based on the product taken out:

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.

When your data are sent to Assicurazioni Generali S.p.A. in the performance of its role as parent company, it acts as the data controller.

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 retain your data for the term of your contractual relationship with us, and once any obligations arising from this relationship have ceased we will keep your data blocked for the periods of retention or limitation set by law. At the end of these periods we will destroy the data.

This includes, but is not limited to, anti-money laundering and counter-terrorist financing legislation which specifies the obligation to retain data for a period of ten years after the expiry of the period of limitation for actions arising from the contract concluded between the parties.

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. 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>.