

## **PRIVACY POLICY STATEMENT**

**(pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 on the processing of personal data)**

The Controller, ITAS Mutua, with headquarters at Piazza delle Donne Lavoratrici n. 2 - Trento (hereinafter "**ITAS**" or the "**Controller**") hereby informs you, pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter also the "**GDPR**"), that your data will be processed in the manner and for the purposes indicated hereunder.

### **1. WHICH PERSONAL DATA DO WE PROCESS?**

For the purposes indicated in this Policy Statement, ITAS may process common personal data such as personal details (name, surname, tax identification no., VAT no., address, telephone number, email and other contact details and an identification number) as well as financial/asset data (e.g. fiscal data on transactions concluded in the course of the contractual relationship with the Controller and banking details).

#### **Source of personal data**

The personal data processed by ITAS are those provided by you directly or collected from a Third Party for the performance of the contract or acquired by consulting legitimately accessible databases, lists and registries, including credit information systems. This Policy Statement also covers the processing of your personal data acquired from Third Parties.

### **2. WHAT ARE THE PURPOSES OF PROCESSING?**

Your personal data will be processed by the Controller for:

#### **2.1 Insurance service and performance of the contract**

In particular for: a) the acquisition of information prior to the conclusion of contracts; b) the preparation and conclusion of insurance policies and the fulfilment of the obligations arising therefrom; c) the collection of premiums; d) the settlement of claims or payment for other services; e) reinsurance; f) co-insurance; g) the correct assessment, including by consulting legitimately accessible databases, such as credit information systems, the reliability and punctuality of payments by the data subject in relation to any requests for facilities with regard to methods of payment of the premium, as well as the prevention and identification of insurance fraud, including the prevention of the risk of identity theft, and the relevant legal actions; h) the establishment, exercise and defence of the rights of the insurer; i) the fulfilment of other specific legal or contractual obligations; l) the analysis of new insurance markets; m) internal management and control; n) actuarial activities; o) access to services for policyholders such as the provision of vouchers, specific agreements, etc.; p) monitoring of the use of the services made available to the data subject.

#### **2.2 Legal obligations**

In particular, legal obligations pursuant to: a) legislation on the prevention of the use of the financial system for the purpose of money laundering or the financing of terrorism and fraud; b) Community regulations and/or legislation; c) regulations enacted by supervisory and control bodies or other authorities authorised to carry out supervisory/control activities.

**Furthermore, for the purposes indicated above:**

<b>Points</b>	<b>Consequences of refusal to provide data</b>	<b>Retention period of your personal data</b>
<b>2.1</b>	impossibility for ITAS to conclude and perform the contract	time necessary to fulfil the above purposes in accordance with the applicable legislation from time to time in force and, in any case, no later than 10 years from the date of last registration pursuant to the Italian Private Insurance Code and ISVAP Implementing Regulation no. 27 of 14 October 2008
<b>2.2</b>	impossibility for ITAS to conclude and perform the contract	time necessary to fulfil the above purposes in accordance with the applicable legislation from time to time in force and, in any case, no later than 10 years from the date of last registration pursuant to the Italian Private Insurance Code and ISVAP Implementing Regulation no. 27 of 14 October 2008

### **3. HOW ARE YOUR PERSONAL DATA PROCESSED?**

Your personal data are processed through the operations indicated in Article 4, no. 2) of the GDPR and specifically: collection, recording, organisation, storage, consultation, processing, alteration, selection, extraction, alignment, use, combination, blocking, disclosure, erasure and destruction of data. Your personal data are processed on paper, electronically and/or automatically.

### **4. WHO HAS ACCESS TO YOUR DATA?**

Your data may be made accessible for the purposes indicated in point 2:

- to employees and contractors of the Controller or Group companies in Italy and abroad, in their capacity as authorised processors and/or system administrators;
- to third party companies or other parties (for example credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, etc.), which perform outsourced activities on behalf of the Controller, in their capacity as Processors.

## 5. TO WHOM CAN YOUR DATA BE DISCLOSED?

Without the need for express consent (pursuant to Article 6(b) and (c) of the GDPR), the Controller may disclose your data for the purposes relating to the performance of the contracts referred to in point 2.1 to other entities in the insurance sector or related thereto, performing a purely technical, organisational or operational function or having a public nature, operating (in Italy or abroad) as our Processors or as autonomous Controllers and which constitute the so-called "**insurance chain**". These include in particular: insurers, co-insurers<sup>1</sup> and reinsurers<sup>2</sup>; insurance and reinsurance agents and brokers; entities qualified to carry out insurance brokerage in accordance with the Italian Consolidated Finance Act (banks, brokerage firms, post offices, financial intermediaries); companies in the Group to which our Company belongs (parent companies, subsidiaries or associates, including indirectly, in accordance with the current legal provisions); lawyers; experts; garages; vehicle demolition centres; payment receipt companies; service companies entrusted with the management, settlement and payment of claims, including service centres, consultancies offering legal services, affiliated healthcare facilities; IT and electronic services or storage companies; postal services companies (for sending, mailing, shipping and distribution of communications to customers); auditors and consultants; financial risk business information companies; fraud control service companies; debt recovery companies; ANIA - National Association of Insurance Companies; consortia bodies in the insurance sector, with particular regard to the Insurance Agreement for Direct Compensation - CARD; insurance companies for the provision of insurance services; other entities or databases to which the disclosure of data is mandatory (e.g. IVASS, CONSOB, UIF, judicial authorities). Your data will not be disseminated.

## 6. WHERE CAN YOUR DATA BE TRANSFERRED?

Personal data are stored in paper files and on servers located in Italy or within the European Union. It is understood, in all cases, that the Controller may move the servers to countries outside the EU, if necessary. In any event, the Controller guarantees that your personal data will be transferred to Third Countries or international organisations only on the basis of an adequacy decision adopted by the European Commission in accordance with Article 45 of the GDPR or in the presence of suitable covers pursuant to Article 46 of the GDPR, or in the presence of one of the derogations specifically provided for in Article 49 of the GDPR.

## 7. HOW ARE YOUR DATA PROTECTED?

In order to protect your personal data and particular data, ITAS adopts appropriate technical, physical, legal and organisational security measures. Most of the personal and particular data in our possession is stored electronically and, to this end, appropriate IT security measures have been implemented to ensure full compliance with the security rules under current legislation.

## 8. WHAT ARE YOUR RIGHTS?

In relation to the processing described in this Policy Statement, as a data subject you may exercise your rights under the Articles of the GDPR, in particular:

- the **right of access** – right to obtain confirmation as to whether or not personal data concerning you are being processed and, where that is the case, to obtain access to your personal data – including a copy.
- the **right to rectification** – the right to obtain from the controller without undue delay the rectification of inaccurate or incomplete personal data.
- the **right to erasure (the right to be forgotten)** – the right to obtain the erasure of personal data concerning you without undue delay.
- the **right to restriction of processing** – the right to obtain restriction of processing where the legal requirements are met.
- the **right to data portability** – the right to receive the personal data concerning you, which you provided to the Controller, in a structured, commonly used and machine-readable format, and the right to transmit those data to another Controller without hindrance, where the processing is based on consent and is carried out by automated means. In addition, the right to have your personal data transmitted directly by ITAS to another Controller, where technically feasible.
- the **right to object** – the right to object, at any time, to the processing of personal data concerning you, based on a legitimate interest, including profiling, unless there are legitimate grounds for the Controller to continue the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
- the right **to file a complaint** with the Italian Data Protection Authority using the appropriate forms on the website <https://www.garanteprivacy.it/home/rights/how-to-act-to-protect-your-personal-data>.
- the right **to withdraw consent** given at any time and with the same ease with which it was provided.

## 9. HOW CAN YOU EXERCISE YOUR RIGHTS?

You may exercise your rights at any time by sending a notice to the following contacts:

- Servizio Privacy Gruppo ITAS c/o ITAS, Piazza delle Donne Lavoratrici n. 2, 38122 Trento;

- email: [privacy@gruppoitas.it](mailto:privacy@gruppoitas.it).

The Controller has appointed a Data Protection Officer ("DPO"), whom you may contact by writing to the email address: [dpo@gruppoitas.it](mailto:dpo@gruppoitas.it).

<sup>1</sup> It is the insurance companies that each cover a share of the risk under the same contract.

<sup>2</sup> These are companies that insure the insurance companies.