



# Informational brochure - Personal data processing

Our company attaches high importance to processing of your personal data. For this reason, in this document we present detailed information why and for what purpose we process your personal data, what rights you have in connection with their processing, and any other information in this regard which may be significant to you.

## 1. Controller of the personal data

The Controller of your personal data is Inter Partner Assistance S.A. with registered office in Brussels, operating in Poland through Inter Partner Assistance S.A. Branch in Poland with registered office in Warsaw, ul. Giełdowa 1; 01-211 Warszawa (hereinafter referred to as: „Insurer“ or „AXA“). The Insurer is a part of the international AXA Group. Website address [www.axaassistance.pl](http://www.axaassistance.pl). As part of his insurance activities, the Insurer acts as data controller, i.e. defines how and for what purpose your data will be used.

## 2. Data protection supervisor

The Insurer uses the services of the data protection supervisor who supervises proper processing of personal data. All necessary specimens of requests and applications concerning personal data protection can be found on the website [www.axa-assistance.pl/iodo/](http://www.axa-assistance.pl/iodo/).

You can contact IODO in a manner that best suits your preferences and capabilities:

- by e-mail [iodo@axa-assistance.pl](mailto:iodo@axa-assistance.pl),
- using a contact form on the website [www.axa-assistance.pl](http://www.axa-assistance.pl),
- by post to the address:  
**ul. Giełdowa 1, 01-211 Warszawa**

You can contact the data protection supervisor in case of any questions concerning processing of your personal data and to exercise your rights indicated below.

## 3. Purposes of and bases for personal data processing

Your personal data may be processed for the following purposes:

- concluding and performing the insurance contract and evaluating the insurance risk – the legal basis for data processing, including data concerning the health condition, are the provisions of the law and purposes in the form of concluding and performing the agreement;
- automatically evaluating the insurance risk as part of profiling prior to concluding the contract – the legal basis for data processing are the provisions of the law;
- direct marketing of the controller’s products and services, including processing of data for analytical purposes and for the purpose of profiling prior to concluding the insurance contract – the legal basis for data processing is processing in a justified interest of the controller; a justified interest of the controller means direct marketing of his services;
- direct marketing of the controller’s products and services, including processing of data for analytical purposes and for the purpose of profiling after expiry of the insurance contract – the legal basis for data processing is a consent which you can send us;
- fulfilling the controller’s duties associated with reporting obligations – the legal basis for data processing are the legal obligations ensuing from the provisions of the law;
- accounting and tax purposes and purposes associated with charging fees – the legal basis for data processing are the legal obligations ensuing from the provisions of the law;
- pursuing and handling claims associated with the insurance contract or protection against claims – the legal basis for data processing is fulfilment of the controller’s justified interest;
- as a measure preventing insurance fraud – the legal basis for data processing are the legal obligations ensuing from the provisions of the law;

- re-insuring of risks – the legal basis for data processing is the need to perform it for the purpose of fulfilling the controller’s justified interest; the legally justified interest of the controller pertains to reducing the insurance risk associated with the concluded contract through re-insurance.

## 4. Recipients or categories of recipients of personal data

Your personal data may be conveyed to the following categories of recipients:

- entities authorized to receive personal data under the Act on insurance and re-insurance activities of 11 September 2015 and other provisions of the law, including other insurers in connection with recourse claims and re-insurers,
- entities processing personal data in behalf of AXA, among other things, entities fulfilling the benefits ensuing from the insurance contract, providers of IT services, entities processing data for the purpose of collecting debt, marketing agencies, or insurance agents – where such entities process data on the basis of an agreement with the controller and solely in line with AXA’s instructions.

We may convey your personal data to other entities as part of the international AXA Group which cooperate with us in providing specific services such as: claim adjustment, call recording and verification of the entities’ permits to pursue a given business activity.

The aforementioned groups of entities act on our behalf, however, we are liable for how they use your personal data for the aforementioned purposes.

Moreover, we may convey your personal data to other entities belonging to/ comprising the international AXA Group for the purpose of managing the costs of claims, improving the products, personalizing the product offer and preventing insurance fraud and detecting.

## 5. Conveying personal data to a third country

Your data may be conveyed to a third party in a situation where it is necessary to render a specific performance under the insurance contract concluded by you and when this is necessary to protect significant interests of yours or of insured persons, especially in case of an insurance contract under which we operate to protect health or life. The AXA Group conducts its business globally, which means that foreign entities provide specific services to it. While conveying the data outside of the European Economic Area and Switzerland, we guarantee such level of protection which best fulfils the requirements of protection of personal data in effect in Poland.

## 6. Personal data storage period

Your personal data will be stored accordingly:

- for the duration of the contract and subsequently until the moment the claims under the insurance contract expire or
- until the moment AXA’s legally justified interest is fulfilled or
- until the expiry of the obligation to store data ensuing from the provisions of the law, in particular, the obligation to keep accounting documents concerning the insurance contract or
- for a period of 12 years from the day on which the insurance contract is terminated for statistical purposes, including for the purpose of determining, on the basis of personal data, the value of the insurance premiums, re-insurance premiums and technical insurance reserves for solvency purposes and technical insurance reserves for the Insurer’s accounting purposes.

The Controller will cease processing the data for direct marketing purposes, including profiling and for analytical purposes, if you object to processing of your data for those purposes. If you gave your consent for the personal data to be processed for marketing purposes, they will be kept until the moment you withdraw your consent to process your personal data.

### **7. Rights of the data subject**

You have the right to:

- access your data;
- rectify/correct your data;
- delete the personal data;
- limit processing of your personal data;
- transfer the data;
- lodge an objection to processing of your data.

You may exercise those rights in the situations and within the scope stipulated in the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC. (Regulation). The Regulation applies starting from 25 May 2018. Within the scope in which the basis for processing your personal data is the consent, you have the right to withdraw the consent at any time. Withdrawal of the consent does not have an impact on the legality of processing of personal data which was performed on the basis of the consent prior to its withdrawal or the purpose of processing of data on a different basis (provisions of the law, justified interest of the controller).

You have the right to lodge a complaint to the supervisory body – President of the Personal Data Protection Office.

### **8. Information whether provision of personal data is a statutory or contractual requirement**

Conclusion of the contract itself does not oblige you to provide your personal data but these data are necessary to conclude and perform the insurance contract and to evaluate the insurance risk – refusal to provide personal data makes it impossible to conclude the insurance contract.

### **9. Automated decision-making**

Information which you provide in the application to conclude or adjoin an insurance contract will be automatically processed in the systems of the AXA Group for the purpose of evaluating the insurance risk. Its outcome will decide whether you will receive a proposal to conclude the insurance contract, a negative reply or a proposal to conclude the insurance contract on terms and conditions differing from those offered initially. In connection with the automated decisionmaking process, you have the right to receive appropriate clarifications regarding the basis for the decision taken, to question that decision, to express your own stance or to have a human interfere (i.e. to have a human analyze the data and make the decision).