

Information on EU General Data Protection Regulation (GDPR)

Introduction

This information concerns the rights of the citizens of the Member States of the European Union regarding personal data processing by the Joint Stock Insurance Company Vienna - Vienna Insurance Group Skopje (the Company), as an insurance company with the VIENNA INSURANCE GROUP and in accordance with the Law on Personal Data Protection and the provisions of the General Regulation on the Protection of Personal Data (GDPR).

Customer information are being collected, stored and processed solely for the purpose of concluding and implementing insurance contracts and policies, as well as providing other related services that the clients request and expect from the Company in accordance with the Company's operation, as well as for the purposes of fulfilment of legal obligations.

The Company respects the right to privacy of customers and needs customers to be aware of their rights when processing their personal data.

1. Personal Data Control and Contact Person

Joint Stock Insurance Company WINNER – Vienna Insurance Group Skopje
Address: Blvd. "Boris Trajkovski" no. 62, 1000 Skopje, Republic of Macedonia
Phone: +3892 15999
E-mail: winner@winner.mk

Personal Data Contact Person:

Natasha Nedelkovska

Personal Data Protection Officer

E-mail: data.protection@winner.mk

2. Personal data processed by the Company and sources from which they are obtained

The Company is processing personal data since it cannot conclude or implement any insurance/policy agreement without the same, or provide other related services arising from the Company's business – insurance (e.g.: exercising the right to damages claim), which is received from customers at the time of the conclusion and during the duration of the business relationship. In addition, and as far as it is required for service providing, the Company shall process personal data that may be provided and allowed for processing from publicly available sources (e.g. National Insurance Bureau, the Agency for Real Estate Cadastre, the Public Revenue Office, enforcement agents, notaries, credit bureaus, the Ministry of Interior, the Public Prosecutor's Office, as well as other institutions regulated by the Law on Insurance Supervision, the Law on Compulsory Insurance in Traffic, the Law on Obligatory Relations, the Company Law, and other laws in the field of insurance regulation or which are transferred from third parties authorized by law).

Personal data include, but are not limited to, the name, surname, date and place of birth, unique identification number, tax number, address, contact details - telephone number, email address, date and place of birth, identification details - the personal identification document, that is, the identity card number or passport number and authentication data - a copy of the signature).

During the processing data from the performed services (payment orders), data on fulfilment of the obligations of the Company (indirect information in the processing of damages), data from the use of digital media offered by the Company (time of access to the Company's website, applications or newsletters, pages or any link clicked by the client) and other data included in these categories.

3. Objectives and legal basis for processing personal data by the Company

The Company carries out personal data processing for the fulfilment of contractual obligations, for purposes of legitimate interests, on the basis of legal obligations or public interest, as well as on the basis of a given consent by the client.

➤ Fulfilment of contractual obligations

The processing of personal data is performed in order to enable the use of the products and services of the Company, that is, for concluding and fulfilling concluded insurance contracts/insurance policies with clients and other related services. Personal data processing is primarily carried out in relation to a particular product (for example: travel insurance policy/damage claims, etc.), and the objectives may include service provision, product related Company services, including data sharing with companies within the Group or third countries, etc.

➤ Legitimate interests

The Company is processing personal data in order to meet the Company's direct legal interests, as well as the legal interests of third parties.

Here are the following cases:

- For legal reasons (for example: collection of uncollected claims);
- For business reasons (for example: measures in cases of breach of contract);
- For security reasons (for example: to avoid compromising the integrity, originality, availability or confidentiality of data);
- For market reasons (for example: direct marketing, advertising the Company's services and services of other companies within VIENNA INSURANCE GROUP, as well as market research, etc.);
- For prevention and detection of abuse and fraud or other forms of improper conduct, etc.

➤ Legal obligations or public interest

The Company is processing personal data in accordance with its legal obligations (in line with the requirements of GDPR, the Law on Personal Data Protection, the Law on Insurance Supervision, the Law on Prevention of Money Laundering and Financing of Terrorism, the Law on Obligatory Relations and other laws regulating the insurance business and personal data protection), as well as on the basis of the regulatory requirements of the institutions, such as the Insurance Supervision Agency, the National Insurance Bureau or other institutions regulated by law. The data are processed for needs such as checks, identity verification, identification for the purposes of money laundering prevention, fulfilment of obligations in the domain of insurance, notifications under the Insurance Supervision Law and the relevant by-laws etc.

➤ Client's Consent

The Company is processing personal data on the basis of a consent for personal data processing for certain purposes (e.g. for marketing purposes). The consent may be withdrawn at any time. Revocation of consent shall not affect the data processed prior to the withdrawal of consent.

4. Personal Data Users

The employees in the Company's organizational units who need data for the fulfilment of contractual and legal obligations, or who have a legitimate interest have access to personal data. The Company may provide customer information only if it represents a legal obligation or if the client has expressly consented to it. Accordingly, users of personal data may be:

- State bodies, public authorization entities and institutions (National Insurance Bureau of the Republic of Macedonia, the Insurance Supervision Agency, tax authorities, notaries, enforcement agents, forensic experts, judicial authorities, etc.) if prompted by a legal obligation, and
- Other insurance and reinsurance companies, institutions the Company submit personal data to (departments and employees within the VIG Group, banks, etc.). The

Company also supplies personal data to service providers who use the same, including companies operating in the following areas: advice and consulting, marketing, information technology, logistics, printing, telecommunications, etc.

The personal data of the service providers may be placed only on the basis of a contract concluded with the service provider and prior check that he/she meets the requirements for legal processing of personal data. Regarding submission of data to users, the Company takes care of confidentiality and the obligation for keeping business secret (maintaining business confidentiality).

If the Company processes the personal data of the client on the basis of consent, the withdrawal of such consent will also apply to the companies listed.

5. Deadlines for keeping personal data with the Company

The Company is processing and storing personal data as required for meeting the contractual and legal obligations, that is, in order to protect the rights and interests of the concerned parties of the insurance/policy agreement and other related services, taking into account the implementation on appropriate technical and organizational measures for the protection of the rights and freedoms of the clients. The Company is subject to various obligations for keeping and recording documents arising from the Law on Insurance Supervision, the Law on Obligatory Relations, the Law on Personal Data Protection, the Law on Prevention of Money Laundering and Financing of Terrorism, the Law on Archival Material, etc. The time limits specified in these laws and regulations for keeping records and/or documenting may be five to ten years after the end of the business relationship with the client. If the legal regulation requires an extended storage of data, the Company shall act and keep data for more than 10 years, in accordance with the legal requirements. Personal information collected on the basis of the client's explicit consent shall be processed for the purposes for which consent is given and should be kept until withdrawal of consent.

If the Company needs to process personal data for statistical purposes after expiration of the storage deadline, it can (permanently) anonymize them in a manner in which the entity cannot be identified.

6. Transfer of personal data to third countries

Personal data is communicated to third countries (EU countries, EEA - European Economic Area, as well as countries outside the EU) only if it is required for the regulation of issues related to insurance policies, existing damage claims and the regulation of damages incurred on the basis of insurance, if provided by law/regulation or on the basis of a given consent. The Company will inform the client of such data transfer if such information is required by law.

7. Rights of the entities to personal data protection

According to GDPR, personal data protection rights are:

- the right to access personal data (Article 15, GDPR),
- the right to rectification (Article 16, GDPR),
- the right to delete (Article 17, GDPR),
- the right to restrict processing (Article 18, GDPR),
- the right to transferability (Article 20 GDPR),
- compliance with the transferability (Article 21, GDPR), and
- the right not to be the subject of a decision solely based on automated processing, including profiling (Article 22, GDPR).

Regarding the right of personal data access and the right of deletion, certain restrictions are applied in accordance with the Law on Insurance Supervision, the Law on Archival Material, the Law on Personal Data Protection, the Law on Prevention of Money Laundering and Financing Terrorism and other legal regulations which control the insurance business.

Notwithstanding the right the entity wishes to use, it may submit a written request as follows:

- a written request sent via mail or delivered personally to the Archive of the Company's Headquarters (Blvd. "Boris Trajkovski" #62, 1000 Skopje), and
- a request sent via e-mail at: data.protection@winner.mk

8. Obligation to provide personal data to the Company

Within the established business relation, the client is obliged to submit personal data to the Company necessary for starting and executing the business relation, that is, fulfilment of the respective contractual obligations. Pursuant to the Law on Insurance Supervision, the Law on Obligatory Relations, the Law on Compulsory Insurance in Traffic, the Law on Prevention of Money Laundering and Financing of Terrorism and other legal regulations, the Company has a special obligation to identify the client before the establishment of the business relationship (to provide and record the data, such as name, surname, place and date of birth, address and other identification data, as well as insight into the personal identification document for the purpose of data processing), and it shall update at certain time intervals the identification documents for the entire duration of the business relationship.

9. Using automatic decision-making/ profiling

The company does not apply automated decision-making in accordance with Article 22 of the GDPR for the establishment and implementation of a business relationship.

10. The right to object

The Client has the right to object, at any time, regarding the processing of his personal data, and in accordance with Article 21 of the General Data Protection Regulation (GDPR), which is based on data processing of public interest and data processing based on legitimate interests. This also applies to any profiling based on this provision within the meaning of the definition of “profiling” under article 4 item 4 of the GDPR which the Company may use for the opportunity to develop new products as well as for advertising purposes. In the event of an objection, the Company will not discontinue the processing of personal data unless there is legal or legitimate interest for the processing of personal data that exceeds the rights to personal data protection.

The Company may use certain personal data for the purposes of direct marketing. The Client at any time has the right to object to the processing of personal data relating to such

marketing. This also applies to profiling to the extent that it relates to such direct marketing. In the event of objection to data processing for the purposes of direct marketing, the Company shall no longer process personal data for that purpose.

The complaint should be addressed to:

Joint Stock Insurance Company

WINNER – Vienna Insurance Group Skopje

Personal Data Protection Officer

Address:

Blvd. “Boris Trajkovski” no. 62,
1000 Skopje, Republic of Macedonia

Joint Stock Insurance Company

WINNER – Vienna Insurance Group Skopje

Personal Data Protection Officer

Natasha Nedelkovska

Handwritten signature

Round seal reads: JS INSURANCE COMPANY
WINNER – Vienna Insurance Group Skopje

