#### WITH WHOM IS USER DATA SHARED?

User data may be sent to:

- Businesses belonging to the EUROP ASSISTANCE Group to which EUROP ASSISTANCE belongs, solely for internal administrative purposes and/or the purposes indicated heretofore.
- To entities entrusted with the management of the corresponding products and services, where applicable.
- Public Authorities with respect to the competencies attributed thereto.

In addition, the data may be accessed by suppliers and providers of EUROP ASSISTANCE, the said access being necessary for proper compliance with legal duties and/or the provision of services related to the purposes indicated heretofore. The said suppliers and providers will not process your data for their own purposes that have not previously been notified to EUROP ASSISTANCE.

The addressees indicated in this section may be located within or outside of the European Economic Area, those in the latter case being duly authorised to carry out international data transfers.

#### **IDENTIFICATION**

- Holder: EUROP ASSISTANCE S.A. SUCURSAL EN ESPAÑA (hereinafter, EUROP ASSISTANCE).
- Tax ID: W-2504100-F
- Registered address: Paseo de la Castellana 130, 28046, Madrid.
- email: atencion\_cliente@europ-assistance.es
- Data Protection Officer (DPO): The User is entitled to contact the DPO in writing addressed to the registered office, indicating for the attention of the "Delegado de Protección de Datos".

#### INFORMATION AND CONSENT

By virtue of the reading of this Privacy Policy, the User is notified of the manner in which EUROP ASSISTANCE collects, processes and protects personal data that is afforded to it by means of the forms provided on the website www.europ-assistance.es (hereinafter, the "Website"), as well as data arising from browsing and any other data that may be provided at a future time to EUROP ASSISTANCE.

Pursuant to legislation in force and applicable with respect to personal data protection and by means of the acceptance of this Privacy Policy, the User provides express, free and unambiguous consent to the processing by EUROP ASSISTANCE of the personal data provided by means of the website, EUROP ASSISTANCE being the Data Controller unless indicated otherwise at the time of the collection of the data.

The User should carefully read this Privacy Policy, which has been drafted in a clear and simple manner to aid comprehension, and determine freely and voluntarily whether to provide the personal data thereof to EUROP ASSISTANCE.



# FOR WHAT PURPOSES WILL THE COMPANY USE THE USER'S PERSONAL DATA AND FOR HOW LONG?

The personal data collected will be used by EUROP ASSISTANCE in accordance with the following purposes:

- Management of the products chosen by the User.
- Management of claims requested by the User.
- Performance of the calculation of the price of the insurance chosen by the User.
- To manage contact and information requests and queries made to EUROP ASSISTANCE through the channels provided thereby on the COMPANY Website.
- Receipt, management and response to the claims made by Users through the means provided on the Website.
- Management of the User's private area or that of any other contact or collaborating entity of EUROP ASSISTANCE.
- Receipt and management of curriculum vitae for purposes associated with staff recruitment.
- Maintenance, support and updating of the Website and of the User restricted content or areas.
- Resolve possible incidents of a technical or other nature that may arise with respect to the Website.
- Performance of advertising and marketing campaigns for the products and services of EUROP ASSISTANCE
- Production of anonymous statistical reports regarding access habits and the activities undertaken by users of the Website.
- Data analysis for the purpose of producing user profiles that enable greater definition of the products that may be of interest to you.
- To manage the Customer Service Programme by means of congratulation mailings on the following dates: the client's birthday, Christmas, New Year or the anniversary of the Company

# WHAT IS THE LEGITIMATE BASIS FOR THE PROCESSING OF YOUR DATA?

The legitimate basis for the processing of the data is:

- The legitimate basis for the contracting of any of the products offered through the Website consists of the execution of the said contract.
- The legitimate basis for the calculation of the policy chosen by the user consists of the consent thereto, along with the legitimate interest associated with the pre-contractual relationship initiated by the User.
- In the case of staff recruitment, the legitimate basis is the consent provided by the
- In the case of the request and management of reimbursement claims, the legitimate basis is the performance of the contract.
- For the management of queries, information requests, complaints and claims, the legitimate basis is the consent provided by the User to this effect.
- For the production of anonymous statistical reports, the basis is the legitimate interest of EUROP ASSISTANCE
- With respect to the processing of your data for marketing purposes relating to the products and services of EUROP ASSISTANCE itself, the basis is the legitimate interest of EUROP ASSISTANCE acknowledged by regulations.

You are entitled to revoke consent to any of the foregoing processing. Nevertheless, this shall not affect the lawfulness of any processing previously performed.

#### **SECURITY MEASURES**

EUROP ASSISTANCE will, at all times and pursuant to the provisions of applicable regulations, process the User's data in a manner that is entirely confidential and safeguard the confidentiality thereof, adopting to this end the necessary technical-organisational measures to guarantee the security of your data and prevent unauthorised modification, loss, processing or access, bearing in mind the state of technology, the nature of the data stored and the risks to which it is exposed.



## DUTY TO PROVIDE DATA

The data requested in the forms provided on the Website is general in nature and required (unless stated otherwise in the field in question) in order to meet the purposes set out.

In consequence, in the event that the data is not provided or provided incorrectly, the requests of users may not be addressed.

# **DUTIES OF THE USER**

#### The User:

- Warrants that he or she is 18 years of age or older and that the data provided to EUROP ASSISTANCE is true, accurate, complete and up to date. To this effect, the User is liable for the accuracy of all of the data provided and will properly update the information submitted such that it corresponds to reality.
- Warrants that he or she has, where applicable, informed third parties of the provision of
  the data thereof and the items contained in this document. Likewise warrants that the
  authorisation of third parties has been obtained for the provision of the data thereof to
  EUROP ASSISTANCE for the purposes set out.
- Is liable for false or imprecise information provided through the Website, along with any damages or losses, whether direct or indirect, caused to EUROP ASSISTANCE or third parties.

## **HOW LONG WILL WE STORE THE USER DATA?**

The personal data that is provided will be stored as long as is necessary to comply with the purposes for which it was collected and in order to determine possible liabilities that may be derived from the said purposes.

Within this context, the criteria used by EUROP ASSISTANCE in order to set the data storage time frames are determined in accordance with the requirements set out in applicable legislation and regulations.

In particular and where applicable, legislation regarding the Prevention of Money Laundering and Funding of Terrorism establishes a duty to store the data for a period of ten years, whereas trade regulations set out a period of six years as of the termination of the contract entered into between the parties. .

## WHAT USER DATA WILL FUROP ASSISTANCE PROCESS?

EUROP ASSISTANCE will process the data that is requested and, in any event, the data that is indicated as required for the provision of the service requested or, purchase of the product chosen by the User.

In the event that the User provides third-party data, the User warrants possession of the consent thereof and undertakes to convey to the interested party, that is the subject of the said data, the information contained in this Privacy Policy, exempting EUROP ASSISTANCE of any liability in this respect. Notwithstanding, EUROP ASSISTANCE is entitled to carry out necessary checks to verify this fact, adopting corresponding due diligence in accordance with regulations in force concerning data protection.

## **EXERCISE OF RIGHTS**

Users are entitled, at any time and free of charge, to write to the address indicated in the heading of this Privacy Policy, or to the following email address delegadoprotdatos@europassistance.es, attaching a photocopy of the identity document thereof, in order to:

- Access their personal data and obtain confirmation regarding whether EUROP ASSISTANCE is processing the personal data of the user.
- Rectify imprecise or incomplete data.
- Request the deletion of their data where it is no longer necessary for the purposes for which it was collected, or object to the processing of the data.
- Ensure that EUROP ASSISTANCE limits the processing of the personal data to the purposes set out in regulations.
- · Request the transferability of their data.
- · Revoke, where applicable, the consent given.
- Procure human intervention, express a point of view and challenge individual automated decisions, including the creation of profiles, that lead to legal effects or significantly impact the data subject.

In the event that it is considered that the rights of the data subject under data protection regulations have not been respected, the data subject is likewise entitled to submit a complaint to the Spanish Data Protection Agency, the address of which is Calle Jorge Juan 6, 28001, Madrid.



# COMMERCIAL AND PROMOTIONAL COMMUNICATIONS

One of the purposes for which EUROP ASSISTANCE processes the personal data provided by Users is in order to send electronic communications with information relating to products, services, promotions, offers, events or news relevant to Users. In the event that any communication of this type is sent, it will be addressed solely and exclusively to those Users that have expressly authorised the dispatch of these. In the event that Users purchase products offered by means of the Website, electronic communications will be sent unless the receipt of these has previously been rejected.

In the event that the user wishes to cease receiving sales and promotional communications from EUROP ASSISTANCE, deregistration from the service may be requested by sending an email to the following address: baja.cliente@europ-assistance.es indicating refusal of the receipt thereof, or by means of the tick box provided in the data collection form or indicating this by means of the opt out provided in each of the commercial communications sent

The user is likewise entitled to oppose and/or revoke consent. To this end, each of the sales communications sent will include the means by which this may be performed.

