



Poistovňa

Union poisťovňa, a. s.  
Karadžičova 10  
813 60 Bratislava  
IČO: 31322051  
DIČ: 2020800353

Spoločnosť zapísaná v obchodnom registri  
Mestského súdu Bratislava III, odd. Sa, vl. č. 383/B

## Basic information on personal data protection for a data subject

*Intended for potential clients, clients (insured, policyholders), persons entitled to receive insurance indemnity, injured parties from an insured event*

### 1. Protecting your data is very important to us

The purpose of this information is to explain to you what personal data we process about you, why we process your personal data and how we process it, to whom your personal data is disclosed or made available and what your rights are in relation to the processing of your personal data. The processing is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (the "Regulation").

### 2. Who is the data controller responsible for the processing of personal data?

The data controller is Union poisťovňa, a.s., Karadžičova 10, 813 60 Bratislava, Slovak Republic, Corporate ID: 31322051, registered in the Commercial Register of the Municipal Court Bratislava III, section Sa, entry no. 383/B (hereinafter also referred to as "we" or "our company"). For the processing of personal data in the areas of marketing, website administration, satisfaction surveys and customer service (call centre), our company is a **joint data controller** together with Union Health Insurance Company, a. s., Karadžičova 10, 814 53 Bratislava, Slovak Republic, Corporate ID: 36284831, registered in the Commercial Register of the Municipal Court Bratislava III, section Sa, file no.: 3832/B.

3. **Our responsible person** is the Senior Director of Legal and Support Activities, who can be contacted at the address Union poisťovňa, a. s., Karadžičova 10, 813 60 Bratislava or by e-mail: [dataprotection@union.sk](mailto:dataprotection@union.sk).

### 4. Who is the data subject for the purposes of this information?

This information applies to you if you are a data subject whose personal data is processed because you are our potential client, client (insured person, policyholder) or you are a representative of a client, a person entitled to receive insurance benefits in the event of the death of the insured person, a client's heir, an injured party of an insurance claim, another natural person whose personal data it is necessary to process in the performance of insurance activities.

### 5. For what purpose is your personal data processed?

We only process your personal data to the extent necessary to fulfil the relevant processing purpose relating to our company's activities, on the basis of generally binding legal regulations, the performance of the subject matter of the contract, your consent or legitimate interest. An overview of all the purposes, categories of personal data and legal bases for processing your personal data is set out in the table below:

Purpose of the processing of personal data where your consent is not required and the categories of personal data we process about you	Legal basis for processing personal data and retention period where your consent is not required
<p><b>Purpose of processing:</b> Performance of insurance and reinsurance activities. The performance of insurance activities includes, for example, the performance of our obligations under pre-contractual relations, the conclusion of insurance contracts, the administration of insurance contracts, the settlement of insurance claims, the provision of assistance services, the documentation of our activities, the performance of tasks pursuant to Act No. 39/2015 Coll. on the insurance industry and on amendments</p>	<p><b>Legal basis:</b></p> <ul style="list-style-type: none"> <li>- performance of the subject-matter of a policy (Article 6(1)(b) of the Regulation);</li> <li>- compliance with our legal obligation (Article 6(1)(c) of the Regulation).</li> </ul> <p><b>Retention period:</b> for the duration of the insurance policy and also for 10 years from the end of the contractual relationship. If we exercise a right under an insurance contract or if the right is exercised against us, we may retain personal data for longer,</p>



## Poisťovňa

<p>and additions to certain acts, as amended (hereinafter also referred to as the “Insurance Act”).</p> <p><b>Category of personal data</b> in the performance of insurance and reinsurance activities<sup>1</sup> (see footnote below).</p>	<p>until the expiry of the limitation period. In the case that your personal data is related to an insurance claim, then we process it for 10 years from the date of closing the insurance claim file. We process personal data about our potential clients for a period of six months (if the website fails to complete the sales process) and for a period of two years (if the website completes the sales process and the prospective client fails to pay the premium).</p>
<p><b>Purpose of processing:</b> performance of our legal obligations under generally applicable law: e.g. bookkeeping, registry management, provision of assistance to public authorities, prevention and detection of laundering of proceeds of crime, protection against terrorist financing and implementation of international sanctions.</p> <p><b>Category of personal data:</b></p> <p>(a) common personal data (birth ID number, name and surname, date of birth, place of residence, gender, e-mail, telephone number, insurance details, including financial transactions);</p> <p>(b) special category (medical condition);</p> <p>(c) other personal data specified in specific legal regulations.</p>	<p><b>Legal basis:</b> compliance with our legal obligation (Article 6(1)(c) of the Regulation).</p> <p><b>Retention period:</b> for as long as necessary under the relevant legislation; for bookkeeping, 10 years from the registration of the accounting document; for routine correspondence, 5 years from the closing of the insurance claim file; for the prevention and detection of money laundering, the protection against the financing of terrorism and the implementation of international sanctions, 5 years from the end of the contractual relationship with the client or from the execution of an occasional transaction outside the business relationship, unless the Financial Intelligence Unit specifies a longer period.</p>
<p><b>Purpose of processing:</b> complaint handling.</p> <p><b>Category of personal data:</b></p> <p>(a) common personal data (birth ID number, name and surname, date of birth, place of residence, gender, e-mail, telephone number, insurance details, including financial transactions);</p> <p>(b) special category (medical condition).</p>	<p><b>Legal basis:</b></p> <ul style="list-style-type: none"><li>- performance of the subject-matter of a policy (Article 6(1)(b) of the Regulation);</li><li>- compliance with our legal obligation (Article 6(1)(c) of the Regulation).</li></ul> <p><b>Retention period:</b> 5 years after closure of the insurance claim file.</p>
<p><b>Purpose of processing:</b> prevention and detection of antisocial activities (fraud assessment).</p> <p><b>Category of personal data:</b></p> <p>(a) common personal data (birth ID number, name and surname, date of birth, place of residence, gender, e-mail, telephone number, insurance details, including financial transactions);</p> <p>(b) special category (e.g. medical condition).</p>	<p><b>Legal basis:</b></p> <ul style="list-style-type: none"><li>- compliance with our legal obligation (Article 6(1)(c) of the Regulation);</li><li>- our legitimate interest (Article 6(1)(f) of the Regulation); we carry out such processing in the interests of the prevention and detection of crime or other undesired antisocial activities, and you have the right to object to such processing.</li></ul> <p><b>Retention period:</b> 10 years after the end of the investigation.</p>

<sup>1</sup> The conclusion of an insurance contract is voluntary, but you are obliged under the Insurance Act to provide us with personal data for this purpose which is not marked as optional, i.e. the provision of data for this purpose is a condition for the conclusion of the insurance contract and failure to provide such data may result in our refusal to conclude the insurance contract. The list of personal data processed without consent is within the scope of Section 78 of the Insurance Act: first name, surname, permanent residence, temporary residence, birth number, date of birth, nationality, type and number of identity document, contact telephone number, fax number and e-mail address and personal data from the identity document. For example, when other personal data are processed, such as health data, they are processed to the extent necessary to assess the risk of the insurance contract and to determine the extent of the insurance indemnity obligation.



Union poisťovňa, a. s.  
Karadžičova 10  
813 60 Bratislava  
IČO: 31322051  
DIČ: 2020800353

Spoločnosť zapísaná v obchodnom registri  
Mestského súdu Bratislava III, odd. Sa, vl. č. 383/B

## Poisťovňa

<p><b>Purpose of processing:</b> exercising our claims and defending our rights.</p> <p><b>Category of personal data:</b> (a) common personal data (birth ID number, name and surname, date of birth, place of residence, gender, e-mail, telephone number, insurance details, including financial transactions); (b) special category (e.g. medical condition, camera recordings).</p>	<p><b>Legal basis:</b> our legitimate interest (Article 6(1)(f) of the Regulation), wherein the processing is carried out in the interest of proving, exercising and defending our legal claims. You have the right to object to such processing at any time.</p> <p><b>Retention period:</b> 10 years from closure of the insurance claim file or until the expiry of the limitation period.</p>
<p><b>Purpose of processing:</b> recording phone calls to our customer call centre.</p> <p><b>Category of personal data:</b> (a) common personal data (birth ID number, name and surname, date of birth, place of residence, gender, e-mail, telephone number, insurance details, including financial transactions); (b) special category (e.g. medical condition).</p>	<p><b>Legal basis:</b> Our legitimate interest (Article 6(1)(f) of the Regulation) so that we can improve the services we provide to you and to enable us to prove and defend our claims. Where the calls are recorded, the caller is notified in advance at the start of the call. You have the right to object to such processing at any time.</p> <p><b>Retention period:</b> 5 years from the creation of the recordings.</p>
<p><b>Purpose of processing:</b> direct marketing – informing our existing clients about news concerning their insurance policy and our products and services they have or which are related to the products or services already provided, including profiling.</p> <p><b>Category of personal data:</b> common personal data (name and surname, title, residential address, e-mail, telephone number, insurance data).</p>	<p><b>Legal basis:</b> Our legitimate interest (Article 6(1)(f) of the Regulation), wherein we carry out such processing for the purpose of informing you in particular about product news and offers, including targeted marketing. You have the right to object to such processing at any time.</p> <p><b>Retention period:</b> for the duration of the insurance contract or until you object to such processing.</p>
<p><b>Purpose of processing:</b> satisfaction survey.</p> <p><b>Category of personal data:</b> common personal data (name and surname, title, residential address, e-mail, telephone number).</p>	<p><b>Legal basis:</b> Our legitimate interest (Article 6(1)(f) of the Regulation) to be able to evaluate the quality of the services provided in order to improve them and to identify the needs of our clients. You have the right to object to such processing at any time.</p> <p><b>Retention period:</b> 3 months from the survey being conducted.</p>
<p><b>Purpose of the processing of personal data where your consent is required (except for essential cookies)</b></p>	<p><b>Legal basis for processing personal data and retention period where your consent is required</b></p>
<p><b>Purpose of processing:</b> marketing offers – product offers, newsletters and competitions, including profiling, for which there is no legitimate interest as a legal basis.</p> <p><b>Category of personal data:</b> common personal data (name and surname, title, residential address, e-mail, telephone number or other specified in the consent).</p>	<p><b>Legal basis:</b> Your consent (Article 6(1)(a) of the Regulation); you may withdraw your consent at any time, without retroactive effect.</p> <p><b>Retention period:</b> for the period specified in your consent or until you withdraw your consent. We then retain your personal data for a further five years after the consent expires.</p>
<p><b>Purpose of processing:</b> ensuring the security and functionality of web services (essential cookies)</p>	<p>More information about such processing can be found on our website here:</p>



Union poisťovňa, a. s.  
Karadžičova 10  
813 60 Bratislava  
IČO: 31322051  
DIČ: 2020800353

Spoločnosť zapísaná v obchodnom registri  
Mestského súdu Bratislava III, odd. Sa, vl. č. 383/B

## Poisťovňa

without consent), evaluating website visitor behaviour and personalising website content (consent-based).	<a href="https://www.union.sk/vyuzivanie-cookies">https://www.union.sk/vyuzivanie-cookies</a>
<b>Category of personal data:</b> cookies and IP addresses.	

### 6. How do we collect personal data?

We collect your personal data primarily from you or through intermediaries (in particular financial agents) who are in a contractual relationship with us, in particular in the process of concluding an insurance contract and during the duration of the insurance contract, e.g. in handling claims arising from an insurance claim. We may also obtain your personal data from other persons if this is necessary for performing our obligations, e.g. from an injured party, a health care provider, the Slovak Insurance Office (in connection with the verification of the claims process in the compulsory contractual insurance of liability for damage caused by the operation of a motor vehicle), the police and public authorities, and from relevant registers. In accordance with the Insurance Act, we may also obtain personal data from other insurance companies for the purpose of protecting clients and preventing insurance fraud.

### 7. Recipients and categories of recipients of personal data

Your personal data may be disclosed or provided to recipients under generally applicable law who have the status of independent controllers and/or joint controllers or, for the purposes set out in point 5 above; we may entrust the processing of your personal data to processors who are authorised to process personal data on our behalf and at our instructions. The selected recipients and categories of recipients to whom your personal data may be disclosed are set out in *Annex 1 Categories of recipients of personal data and selected recipients and processors* to this document.

### 8. Your rights as a data subject

If we process personal data about you, you have the following rights in relation to us under the Regulation, unless otherwise provided for by generally applicable law (the Regulation sets out your rights in Articles 12 to 22):

- 8.1. the right to obtain confirmation as to whether your personal data is being processed and, if so, the right to obtain access to that personal data pursuant to Article 15 of the Regulation, together with the information set out in this notice;
- 8.2. the right to rectification and completion of your personal data pursuant to Article 16 of the Regulation;
- 8.3. the right to erasure (“forgetting”) of your personal data if they are no longer necessary for the purposes for which they were collected or otherwise processed pursuant to Article 17 of the Regulation;
- 8.4. the right to have us restrict the processing of your personal data where one of the cases under Article 18 of the Regulation is met;
- 8.5. the right to obtain the personal data concerning you that you have provided to us and the right to transfer that data to another controller pursuant to Article 20 of the Regulation;
- 8.6. **the right to object to the processing of your personal data by us and/or to lodge a complaint at any time. You have the right to object under Article 21 of the Regulation if we process your personal data on the basis of a legitimate interest, as well as if we process it for direct marketing purposes, including profiling;**
- 8.7. the right to object to us and not to submit to our decision which would have legal effects or significant impact on you if such decision is made solely on the basis of automated processing operations pursuant to Article 22 of the Regulation. You have the right to request us to review a decision issued by way of a method other than an automated form processing, whereupon we are obliged to comply with such request so that our staff will have a decisive role in reviewing the decision. We shall inform you on the manner of reviewing and result of the finding within 30 days of receiving your request;
- 8.8. the right to request proof of identity of the person responsible for collecting personal data;



## Poisťovňa

8.9. if your personal data has being connected from a source other than you, you have the right to obtain information about the source of your personal data, or information about whether the data comes from publicly available sources.

You can exercise your rights in one of the following ways:

- in writing at our registered office: Union poisťovňa, a. s., Karadžičova 10, 813 60 Bratislava, Slovak Republic or in writing at the following email address [dataprotection@union.sk](mailto:dataprotection@union.sk);
- in person in spoken form in a memorandum, which must show who exercised the right, what you claim, when and who made the memorandum, their signature and your signature; we will give you a copy of the memorandum;
- at the intermediary, who will then forward your request or memorandum to us for handling.

## 9. You have the right to lodge a complaint with the supervisory authority, namely the Office for Personal Data Protection – Úrad na ochranu osobných údajov

You have the right to lodge a complaint with the Office for Personal Data Protection if you believe that our processing of your personal data is in contravention of data protection legislation.

## 10. Does the processing of your personal data involve automated individual decision-making or profiling?

The processing of your personal data by our company does not involve automated individual decision-making. Our company uses **profiling – automated personal data processing tools** for the purpose of evaluating certain aspects of your personal data for the following purposes/sub-purposes:

- profiling related to the purpose of carrying out insurance and reinsurance activities for the purpose of insurance risk analysis in underwriting risks and assessing claims in pre-contractual relationships;
- profiling related to marketing outreach in the form of targeted marketing offers;
- profiling related to the prevention of insurance fraud for the purposes of protection against money laundering, protection against the financing of terrorism and the implementation of international sanctions.

Profiling may result, for example, in the refusal to enter into an insurance policy (in the context of underwriting risks or fraud prevention), the consideration of claims rates when setting the terms and conditions of your insurance policy, including the amount of the premium, the sending/not sending of a targeted marketing offer.

## 11. Personal data will not be published.

## 12. Transfer of personal data

Our company mainly transfers your personal data to recipients in countries of the European Union, countries that are party to the Agreement on the European Economic Area and Switzerland. We will transfer your personal data to third countries only if the European Commission has decided that these countries guarantee an adequate level of protection or, in the absence of such a decision, only if the controller or processor has provided adequate safeguards and if you have enforceable rights and effective legal remedies, or if additional security measures have been taken in relation to the transfer of your personal data.

As part of some marketing communications and data backup, our company also uses major service providers such as Google, Facebook, Microsoft, namely Google LLC, Meta Platforms, Inc., and Microsoft Corporation. These contractors are from the USA and the transfer of personal data to these entities is based on the European Commission's adequacy decision adopted on 10 July 2023, concerning the EU-US Data Privacy Framework under Article 45 of the Regulation. USA contractors participating in this framework and to whom personal data can be securely transferred from the EU without the need to implement additional privacy safeguards can be found at: <https://www.dataprivacyframework.gov/s/participant-search>, listing the respective contractors and their privacy protection policy.

## 13. Updating basic information on data protection for the data subject



Union poisťovňa, a. s.  
Karadžičova 10  
813 60 Bratislava  
IČO: 31322051  
DIČ: 2020800353

Spoločnosť zapísaná v obchodnom registri  
Mestského súdu Bratislava III, odd. Sa, vl. č. 383/B

## Poisťovňa

Our company has the right to update the following basic data protection information for the data subject from time to time (including Annex 1), and the current version of this information is always available on the website [www.union.sk](http://www.union.sk) under the Privacy Policy.

### Annex 1 – Categories of recipients and personal data and selected recipients and processes

Your personal data may be provided, in particular, to:

- our affiliated company Union zdravotná poisťovňa, a. s., Corporate ID: 36284831 and our parent company Achmea B.V., The Netherlands, corporate ID: 33235189;
- financial agents in the insurance or reinsurance sector;
- reinsurance companies;
- medical examiners;
- assistance companies;
- in the case of an insured event, to companies with which we cooperate in handling insurance claims;
- companies acting for and for the benefit of our company in connection with the exercise of rights in relation to a policyholder arising under an insurance policy;
- companies providing services related to correspondence between our company and data subjects;
- companies providing information technology services;
- a company that provides document digitisation for our company;
- a company performing archiving centre and registry administration;
- a company that evaluates surveys of satisfaction with our services;
- to our external auditor;
- public authorities pursuant to applicable legislation.

If you have an insurance policy concluded for travel insurance and mountain rescue expenses insurance, an insurance policy for insurance of property and liability for damage to natural persons, the personal data stated in the insurance policy may also be provided to:

- the company providing assistance services Eurocross Assistance Czech Republic, s.r.o., corporate ID: 25598180.

If you have an insurance policy concluded for insurance of a motor or trailer vehicle, or an insurance policy on motor third-party liability insurance, the personal data stated in the insurance policy may be provided also to:

- the Slovak Insurance Office, corporate ID: 36062235, in compliance with the provisions of Section 11(3) of Act No. 381/2001 Coll.,
- the company providing assistance services Eurocross Assistance Czech Republic, s.r.o., corporate ID: 25598180;
- a car service centre performing repair of damaged vehicles.

If you have an insurance policy concluded for insurance of oncological illness and the insurance Moje zdravie [My Health], the personal data stated in the insurance policy may be provided also to:

- the company MediGuide International, LLC, 4550 Linden Hill Road, Ste 103, Wilmington DE 19808, United States of America, which provides verification of the established diagnosis and assessment of the proposed treatment;
- the local partner of MediGuide International, which ensures communication between the insured, MediGuide International, and the foreign clinic chosen by the insured from the offer, which verifies the established diagnosis and the proposed treatment;
- a specialised clinic, which the insured chooses from the offer and which carries out the verification of the established diagnosis and the proposed treatment.