



COMERAGON'S PRIVACY POLICY

on the grounds of the General Data Protection Regulation EU 679/2016, as implemented in national legislation by L.4624/2019

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1. INTRODUCTION

This Privacy Policy (hereafter referred to as " Policy") concerns the company:

Comergon SA Risk Managers - Insurance Brokers

VAT: 095652952 Tax Office: FAE Athens

9 Brahamiou Street, 15124 Marousi

Tel: +30 210 61 96 525 Web: www.comergon.gr Email: info@comergon.gr

(hereinafter referred to as "Comergon")

and the personal data that Comergon retains for natural persons.

Comergon shall be bound by confidentiality and privacy of Personal Data and complies with the applicable provisions of the "General Data Protection Regulation", hereinafter referred to as "GDPR".

2. DEFINITIONS

- **Data subject:** the individual (natural person) to whom personal data is related.
- **Personal data:** is any information that refers to and describes an individual, such as:
 - o identification (name, age, residence, occupation, marital status, etc.)
 - o physical features
 - o education
 - o profession (work experience, working behavior, etc.)
 - o financial situation (income, assets, financial behavior)
 - o Interests, activities, habits
- **Sensitive personal data or data of special categories:** are a person's personal data concerning:
 - o racial or ethnic origin
 - o political opinions
 - o religious or philosophical beliefs
 - o trade union membership



- o health
 - o social welfare
 - o sex life
 - o criminal prosecutions and convictions
 - o participation in associations related to all of the above.
- **personal data breach:** a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to personal data transmitted, stored or otherwise processed
 - **processor:** a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller
 - **processing of personal data:** any operation or set of operations related to personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, recovery, information search, use, disclosure by transmission, dissemination or otherwise making available, correlation or combination, restriction, erasure or destruction.
 - **third party:** any natural or legal person, public authority, agency or body other than the data subject, the controller, the processor and the persons who, under the direct supervision of the controller or the processor, are authorized to process personal data.
 - **Insurance mediation:** any activity of introducing, proposing or carrying out preparatory work towards the conclusion of insurance policies, or of conclusion of such policies, or of assisting in the administration and performance of such policies, in particular in the event of a claim.

3. WHO IS THE CONTROLLER

Comergon is the controller of personal data which are processed in the context of executing the mandate for insurance mediation.

4. OBJECT OF PROCESSING

The object of processing is the personal data of our customers, insureds and/or prospect customers, beneficiaries, counterparties, policy holders and/or third parties, we collect and/or transmit to insurance companies and/or third parties, in the course of our work as an insurance intermediary.



5. PRINCIPLES ON PROCESSING PERSONAL DATA

Comergon is committed to maintain the following principles of personal data processing [Article 5 of the GDPR]:

- *Lawfulness, objectivity and transparency.*
- *Purpose limitation* - Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- *Data minimization* - Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- *Accuracy / quality of data* - Personal data shall be accurate and, where necessary, shall be updated.
- *Storage duration* - Personal data shall be kept for no longer than is necessary or required by law.
- *Integrity and confidentiality* – Personal data must be processed in a manner that ensures appropriate security, especially towards protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, by the use of appropriate technical or organizational measures.
- *Accountability*

6. COLLECTION OF PERSONAL DATA

We collect personal data:

- at the pre-contractual stage in order to investigate the market and propose the best possible insurance solution
- at the time the contract is being drafted, depending on the contractual terms it requires
- during the term of the insurance contract for its better administration.

We also collect data occasionally from third parties who may lawfully disclose to us information about our customers or to whose records we may legitimately have access, such as external affiliates of ours or Insurance Companies, Credit Information and Fraud Prevention Organizations or Agencies,



engineers, surveyors, assessors, Lawyers, Public Services (Administrative, Tax, Judicial, Regulatory, Insurance Funds) or other Private or Public Legal Entities.

Data concerning persons under the age of 18 are collected only with the consent of the person who exercises parental responsibility.

Please help us keep your personal data up to date by notifying us of any changes.

7. WHAT TYPES OF PERSONAL DATA WE COLLECT

The following categories of personal data relating to you may be collected and further processed as described in this Policy:

- Identification Information (e.g. Name and Surname)
- Contact Information (e.g. Address)
- Professional status information (e.g. Profession)
- Payment Information (Bank Account / IBAN Number)
- Identification data (e.g. contract number)
- Additional personal information / preferences (e.g. marital status)
- Special Categories of Personal Data (under Article 9 & 10 of the GDPR)
- Customer history (e.g. Loss)
- Application / Web / social media data (e.g., cookies)

In **Appendix 2: 'Indicative Data Categories'**, we present indicatively personal data that we process.

8. CATEGORIES OF DATA SUBJECTS

Data subjects may be:

- Insured persons
- Persons to be insured
- Policyholders and counterparties (e.g. for group schemes)
- Prospects



- Natural persons in their capacity as employees, directors or partners in a legal entity.
- Insurance beneficiaries
- Potential insurance beneficiaries
- Third parties involved in events related to the assessment or the occurrence of an insurance risk.

9. WHAT ARE THE PURPOSES & THE LEGAL GROUNDS OF DATA PROCESSING

The processing of personal data is based on one of the "legal grounds" as referred to in Article 6 § 1 of the GDPR (Lawfulness of processing). An explanation of the legal grounds for processing is available in **Annex 1** of the present privacy policy: '**LEGAL GROUNDS OF PROCESSING PERSONAL DATA**'. The legal grounds on the processing of your data relates to one or more of the purposes below:

- **Conclusion & Administration of Insurance Policies** - We process your data in order to conduct a market research amongst insurance companies and/or insurance intermediaries and/or third parties on your behalf, to forward insurance application forms for risk assessment while drafting an insurance contract, and for the administration of your contract (e.g. offer, proposal, acceptance, commencement of insurance policy, administration, amendment, redemption, claims handling) [Article 6§1 (a), 6§1 (b) and 6§1(f) GDPR].

Providing your personal data to us, in the context of commencement and administration of your insurance policy as well as advisory services, is your contractual obligation and failure to do so will affect the proper performance of the insurance contract and/or will make this unfeasible (e.g. commencement of insurance contract and/or settlement of claims).

- **Customer Support and Marketing** – We process your data in order to reply to your questions and to inform you about our news and our products (Article 6 § 1 (a) and 6 § 1 (f) GDPR).

Your consent for marketing purposes can be revoked at any time, with going-forward effect.



For existing customers on May 25th 2018, consent is not required, since their ability to oppose is provided in a clear and explicit way [Law 3471/2006, Article 11§3].

- **Pursuance of our legitimate Interests** - e.g. to improve our products and services, prevent and detect fraud against us (Article 6§1, (f) GDPR).
- **Compliance with our legal obligations**, - towards police, regulatory, fiscal, accounting, judicial and tax authorities and towards statutory auditors, under the Foreign Account Tax Compliance Act FATCA provisions (Article 6§1 (c) of GDPR).

The transmission of personal data as above, constitutes our legal obligation and depends on the specific request.

- **Processing of Special Categories of Personal Data** - According to the Article 9§1 and 2 of the GDPR, the processing of special categories of personal data is allowed only in the specific cases dictated by law, under special provisions among which the **provision of consent** [Article 9§2 (a) GDPR].

10. HOW WE ENSURE THE SAFETY OF PERSONAL DATA

We ensure that personal data are processed by adhering to policies and procedures that are consistent with the purposes of processing. For example, the following **safety measures** are used in order to protect personal data against misuse or any other form of unauthorized processing:

- Access to personal data is restricted to a limited number of authorized persons for these specific purposes.
- Staff responsible for managing your insurance policies is bound by confidentiality clauses having graded and restricted access only to those personal data necessary to complete the provision of the service.



- Sensitive data are stored on a computer with authorized access. Data in hard copies are locked in cabinets where only authorized personnel have access.
- We select reliable partners who are bound in writing according to Article 28§4 of the GDPR with the same privacy protection obligations as far as personal data protection is concerned. Indicative: Insurance consultants, reinsurers, insurance intermediaries, service companies e.g. IT, postal, document management. We retain the right to audit them under Article 28§3 (h) GDPR.
- IT systems used to process data are technically isolated from other systems in order to prevent unauthorized access, for example through hacking.
- In addition, access to these IT systems is monitored on a permanent basis in order to detect and prevent illegal use at an early stage.

11. FOR HOW LONG WE KEEP YOUR DATA

We store personal data for the necessary time required by the corresponding processing purpose and any other permissible associated purpose. Data will be retained throughout the term of your mandate and, after its expiry, for the time interval dictated by the applicable law that enables claims to be raised according to the insurance policy or, in the event of a claim, until the irrevocable resolution of any litigation.

Therefore, if the data are used for two purposes, we will retain them until the purpose with the longest duration expires, but we will stop using them for the purpose with the shortest duration, as soon as that duration expires. Information that is no longer necessary are safely destructed.

Specifically, the data we process with your consent (e.g. for marketing purposes), these are retained from the time we received the relevant consent and until this consent is revoked.

Also, we will retain your personal data for up to 5 years if your application for an insurance policy is rejected.



12. TO WHOM MAY YOUR PERSONAL DATA BE TRANSFERRED

The personal data we collect may be transferred to third parties, provided that the transfer is legally justified. Furthermore, where the legality of the transfer is justified, personal data may be communicated to the following categories of recipients:

- Insurance companies
- Reinsurers
- Hospitals, Diagnostic Centers and Laboratories
- Medical Doctors
- Transportation/ transfer companies
- Affiliated companies within their responsibilities
- External partners who commit themselves in writing under Article 28§4 of the GDPR, binded by the same data protection obligations.
- Any supervising authority, as the case may be, that is required by the current supervisory framework, e.g. Bank of Greece, General Secretariat for Consumers, The Greek Ombudsman.
- Any public or judicial authority, if required by law or by a court order.

Comergon uses a number of external partners in order to be able to offer the services mentioned.

Although data transmission over the Internet or a website cannot be absolutely guaranteed and protected against cyber-attacks, both we and our partners are working towards maintaining physical, electronic and procedural security measures to protect your data.

13. WHERE DOES THE PROCESSING TAKE PLACE

The personal data of our clients are processed within the European Economic Area (EEA).

Ensuring continuity of cross-border healthcare depends on the transmission of personal data concerning patient's health (Directive 2011/24 / EU) - Recital 35 GDPR -, provided that individuals have access to personal data relating to their health. Consequently, within the EU Member States



there is no need for consent concerning the transmission of this data from one Member State to another, though at the same time the fundamental rights of individuals must be protected.

In cases market research, conclusion of a contract and administration of an insurance contract outside the EEA is required, then it is subject to explicit consent (Article 49§4 (a) GDPR).

14. PERSONAL DATA BREACH

In the event of a breach of the security and integrity of personal data at our disposal, Comergon will take the following measures in accordance with Articles 33 and 34 of the GDPR:

- Review and evaluate the procedures needed to limit the breach.
- Assess the risk and its impact on the rights and freedoms of data subjects.
- Try to reduce as much as possible the damage that has been or may be caused.
- Notify within 72 hours after having knowledge of the breach, if required.
- Evaluate the impact on privacy and take appropriate steps to avoid repetition of the breach.

15. YOUR RIGHTS AS A DATA SUBJECT AND HOW TO EXERCISE THEM

You have the right to request access to your personal data, to rectify/erase your personal data, to restrict its processing, to object to the processing and/or to exercise your right to data portability.

If your data processing is based on your consent, you can revoke your consent at any time, with effect for the future.

More specifically, you have the right to:

a. Access: Right to be informed about the processing of your Data by us, and right to access the data.

b. Rectification: Right to request rectification or completion of your data if they are inaccurate or incomplete.

c. Erasure: Right to request the erasure of your data. We can satisfy this right:



- If the data are no longer necessary in relation to the purposes for which they were collected
- If there is no legal ground for processing other than consent.
- If you exercise the right of objection (see [f] below)
- If the data have been unlawfully processed
- If the data have to be erased for compliance with a legal obligation

We reserve our right to deny the erasure of your data to the extent that the processing of the data is necessary for compliance with a legal obligation or for the performance of a task carried out in the public interest or for the establishment, exercise or defense of legal claims [Article 17§3 GDPR].

d. Restriction of processing: Right to indicate data in order to limit their processing. For example, when you have questioned the accuracy of your personal data, for the time necessary for verification.

e. Portability: You have the right to receive your data in a structured, commonly used and machine-readable format and ask for it to be sent to you or to another controller.

f. Objection: Right to object at any time to the processing of your data, where processing includes profiling and also when the purpose of processing concerns direct marketing.

Comergon will review your request and respond to you within one month of its receipt, either by satisfying your request or informing you about the objective reasons that hinder the satisfaction of your request. Given the complexity of your request and the number of requests we are dealing with, this period may be extended by two further months [Article 12§3].

Withdrawal of your consent may, depending on the case, result in the immediate interruption of our services, if consent is the legal ground for the processing of your personal data.

Your rights will be exercised free of charge, by sending a request / letter / email to the Controller. In case of abusive exercise of the above rights, a reasonable fee may be charged [Article 12§5].



In case you are not satisfied with the processing of your data by us or from our response to your request, you may file a complaint before the Data Protection Authority.

You may exercise these rights using the contact details listed below.

16. CONTACT INFORMATION OF THE CONTROLLER

For any matter concerning the processing of your personal data and the exercise of your rights, you may contact Monday - Friday 09:00 - 16:00 with:

Comergon SA Risk Managers - Insurance Brokers

9 Brahamiou Str., 15124 Marousi

Tel: +30 210 61 96 525 Web: www.comergon.gr Email: info@comergon.gr

17. CONTACT INFORMATION OF THE PERSONAL DATA PROTECTION AUTHORITY

Tel: +30 210 64 75 600 e-mail: contact@dpa.gr

Postal Address: 1-3 Kifissias Avenue, 115 23, Athens, Greece

18. COOKIES

Cookies are important for the efficient operation of www.comergon.gr and for improving your online experience. Click "Accept Cookies" in order to continue or select "More Information" in order to see detailed descriptions of cookies and to decide whether or not to accept certain cookies.

What are cookies?

Cookies are small text files that contain information stored on your computer's web browser while browsing www.comergon.gr. These cookies can be removed at any time, as you can modify browser settings to reject some or all cookies.

The help function in most browsers provides information on how to accept cookies, disable cookies, or notify you when you download a new cookie.



We use cookies in order to continuously improve our site's functionality, effective browsing, as well as linking and navigating pages.

The information generated by the cookies concerning your use of the website (including your IP address), will be transmitted and stored on Google & its servers.

If you do not accept cookies, you may not be able to use certain features of our Service and we recommend that you leave them enabled.

19. RECORDING DATA & REMARKETING

We may collect information sent by your browser every time you visit our site. These log data may include information such as your computer's IP address, browser type, browser version, pages you visit, the time and date of your visit, the time spent on those pages and other statistical data.

In addition, we may use third party services, such as GoogleAnalytics, that collect, monitor and analyse this kind of information, in order to improve the functionality of our site and our services. These third-party service providers have their own privacy policies on how they use this information and we recommend that you learn about them.

Comergon uses remarketing services in order to be advertised on third party sites after your visit to our site.

GoogleAdWords remarketing service is provided by Google Inc.

Google also recommends that you install the GoogleAnalytics opt-out plugin - <https://tools.google.com/dlpage/gaoptout> - for your web browser. The GoogleAnalytics Exclusive Browser add-on provides visitors with the ability of preventing the collection and use of their data by GoogleAnalytics

For more information about Google's privacy practices, please visit the Google web site at <http://www.google.com/intl/en/policies/privacy>



20. COMMERCIAL COMMUNICATION - NEWSLETTER

The visitor/user may visit our website www.comergon.gr which is maintained and managed by Comergon SA, without revealing his/her identity and without providing any personal data, subject to the acceptance of relevant cookies (see above).

In general, you do not have to submit personal data to Comergon online, but we may ask you to provide some personal data so you can receive additional information about our services and events. Comergon may also request your permission for certain uses of your personal data, and you may either consent or deny these uses.

However, in order for the visitor/user to receive electronic information material (e.g. Newsletters) sent by the Company on issues regarding the insurance industry, the economy and overall timeliness and to benefit from future privileges by the Company, he/she may have to give his/her **explicit consent** regarding his/her registration with the services of the Website and the conveyance to the Company of the information that is imprinted on the relevant communication form. You will be able to unsubscribe from the relevant recipient list at any time by following the instructions contained in each communication. If you decide to unsubscribe from a service or communication, we will attempt to delete your data as quickly as possible, although it may need certain time and/or information before we can process your request.

Personal data collected is stored on password-protected servers of restricted access and Comergon uses special technologies and procedures to enhance the protection of this information against loss or misuse and to protect the data against unauthorized access, disclosure, alteration or destruction. However, although Comergon does its best in order to protect the above data, it cannot guarantee that these technologies and processes will never be compromised in any way.

To this end, if any visitor/user is aware of any illegal, malicious, inappropriate or fraudulent use of personal data that is in any way related to the use of the Site, he/she undertakes the obligation to notify the event directly to Comergon.



21. PASSWORDS

In the event that we give you (or you have chosen) a password for access to certain parts of our website or any other web portal, to applications or services we offer, you are responsible for keeping this password secret and to comply with any process security, we have informed you about. We ask that you do not share the password with any person.

22. LINKS TO OTHER WEB SITES

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to this third-party site. We encourage you to review the Privacy Policy for each site you visit. We have no control and we do not undertake any responsibility for the content, privacy policies or practices of any third party sites or services.

23. UPDATING OF PRIVACY POLICY

This policy is being revised when there is a major change. The updated version will be available on our website www.comergon.com



ANNEX 1

LEGAL GROUNDS OF PROCESSING OF PERSONAL DATA

According to Article 6 of the GDPR:

Processing shall be lawful only if and to the extent that at least one of the following applies:

- (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes
- (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take measures at a request of the data subject prior to entering into a contract
- (c) processing is necessary for compliance with a legal obligation to which the controller is subject
- (d) processing is necessary in order to protect the vital interests of the data subject or of another natural person
- (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

- **Sensitive personal data:**

According to Article 9 §1 & 2 of the GDPR, the processing of specific categories of Data is permitted only in the specific cases specified by law, **including consent**.



ANNEX 2
INDICATIVE CATEGORIES OF DATA

Identification Information:

- Name and surname
- Title (Mr / Mrs)
- Date of birth
- VAT NUMBER (AFM)
- AMKA (social security number)
- Identity card

Contact information:

- Address
- Email address
- Phone number/ mobile phone number
- Fax number

Professional Status Information:

- Profession
- Income
- Membership number in associations, unions, chambers
- Insurance registry number
- Data concerning financial behavior
- Studies

Payment Information:

- Bank Account / IBAN Number
- Desirable payment method
- Credit / Debit Card Number
- Loss payments



Identification data (indicative):

- Customer Number/Code
- Policy Number

More personal information/preferences (indicative):

- Marital status
- Family members
- Driver's License (type)
- Requests for information (market research)
- Insurance company indicated by client
- Preferable way of communication
- House value, building permits
- Mortgages

Specific categories of personal data (indicative):

- Medical history
- Data concerning health (medical treatment and/ or examinations performed)

Client History:

- Customer satisfaction (and further information in the context of a satisfaction survey)
- Offers received by client
- Information concerning warranties
- Information concerning complaints

Applications, web pages, social media data:

In case the client has signed or logged in one of the above, the following data might be retained by us:

- Website traffic
- Data received while using cookies (applicable where cookies policy has been accepted by client).