

Notice on Personal Data Processing and Handling

Data on Personal Data Controller

OTP osiguranje ADO Beograd, 50 a/b Bulevar Zorana Đinđića Street, 11070 Novi Beograd, telephone number: 011/2608-665, fax number: +381 11 260 7330, e-mail: info@otposiguranje.rs, webpage: www.otposiguranje.rs

Contact Data of the Personal Data Protection Officer

E-mail: zastita.podataka@otposiguranje.rs
Telephone number: 011/2608-904.

Data Collected

Personal data collected from policy holders are name and surname, personal number, address, citizenship and the number of the bank account. From the insured person, data on name and surname, date of birth, sex, personal number, address, health condition as well as lifestyle habits and financial data are collected in line with defined limits of insured sums and access age of the insured person, and in case the insurance coverage is taken for bank loan, data on such loan are also collected (contract number, repayment schedule, duration of the obligation). Insurer collects data as mandatory in the sense of necessary data for the conclusion of the insurance contract, thus, this data minimum is necessary for the conclusion of the insurance contract and if not delivered, the Insurer cannot conclude the contract. Insurer requires additional data on place of work and occupation of the policy holder, that is, employment status, as well as responses to certain questions related to determination of risk from money laundering and financing of terrorism and a copy of an identification document (ID card or passport) necessary for actions prescribed by the Law on Prevention of Money Laundering and Financing of Terrorism.

This data is also necessary for contract conclusion, and the obligation for their delivery is mandatory by law thus, if not delivered, the Insurer cannot conclude the contract.

Personal data related to telephone number and e-mail address shall be collected based on consent of data subjects and are not necessary to conclude an insurance contract and the contract can be concluded without delivery of such data.

Purpose of Intended Data Processing and Legal Basis for Data Processing

Personal data collected in the negotiations phase, as well as in the phase of contracting the insurance contract, shall be used for the purpose of risk assessment related to insurance coverage, conclusion of the contract, meeting contractual obligations by the Insurer and providing insurance coverage based on the contract, as well as for the purpose of exercising rights of the Insurer based on the concluded insurance contract. Insurer shall use collected data for the purpose of informing the data subjects on rights and obligations from the contract and providing benefits based on the contract. In case of submitting complaints related to the work of the Insurer or complaint for the protection of personal data, the Insurer shall be authorized to use personal data of the person submitting complaint as well as the person the complaint is related to, to the extent it is necessary to resolve the complaint. In case court or any other proceedings are initiated related to the contractual relationship in front of competent authorities the Insurer shall use necessary personal data for the purpose of implementing the procedure or acting in line with received orders of competent authorities. Legal basis for processing of data for this purpose shall be based on necessity to act at the request of data subjects, that is, necessity to execute contracts, and also, processing shall be necessary to fulfil the legal obligations of the Insurer.

Collection of health data of the insured person shall be performed only for the purpose of risk assessment of the Insurer related to the occurrence of death, decision on taking risk and determination of insurance premium amount. Also, this data is collected and used after the submission of claims by the user, and then, if necessary, additional data on health condition of the insured person are collected to determine causes and circumstances of occurrence of insured event and decision-making on the claim. Legal basis for data processing for this purpose is the necessity to act at the request of data subject, that is, necessity to execute the contract, also, processing is necessary to meet the legal obligations of the Insurer. In addition to stated basis, the processing is based on the consent of data subjects.

Biometrical data and data from personal documents shall be collected for the purpose of identifying persons from the contractual relationship and for acting in line with the Law on Prevention of Money Laundering and Financing of Terrorism. Legal basis for processing of such data originates from the law, that is, obligation of meeting legal obligations of the Insurer, however, since this is a special kind of data, consent of data subjects shall also be provided.

Within marketing and commercial activities, personal data shall be used for notifying on activities of the Insurer and new insurance products, surveying customer satisfaction, informing on additional benefits with insurance services. Data analysis shall also be performed related to the data the Insurer collected, but such data shall be anonymized thus, the data related to age or sex cannot be connected to the personality of the data subject. Legal basis for collection of such data shall be consent of data subjects. Data subjects shall be entitled to withdraw consent provided in such a manner by sending request to e-mail address zastita.podataka@otposiguranje.rs.

Data shall be used for reporting of the supervisory body over the operations of the Insurer, as well as in cooperation with audit company of the Insurer. Legal basis for processing of this data shall originate from the law.

Personal Data Processors and Recipients

For all insurance products:

OTP Group to which the Insurer belongs to and its other members,
OTP Bank Serbia a.d. Novi Sad with seat at 5 Trg Slobode Street, Novi Sad – insurance broker,
IN2 informatički inženjering d.o.o. with seat at 7c Šmarska cesta, Koper, Slovenia, insurance broker
Comtrade System Integration d.o.o. Belgrade, with seat at 7 Savski nasip Street, Belgrade,
Physician censor with which the Insurer concluded a cooperation agreement,
REISSWOLF SERBIA DOO STARA PAZOVA with seat at bb Volarsko polje, Stara Pazova,
Reinsurance company Dunav Re a.d.o. with seat at 18/I Bulevar kralja Aleksandra, 11000 Belgrade, in case the specific insurance contract is subject to reinsurance and a foreign reinsurance company cooperating with this company and on this basis takes the risk from the insurance contract,
ARHIVIRAJ d.o.o. with seat at 6a Maksima Gorkog Street, Belgrade,
National Bank of Serbia, with seat at 12 Kralja Petra Street, Belgrade,
Tehnobiro d.o.o. Belgrade, with seat at 14 Varvarinska Street, Belgrade,
Law Office Aleksić and Associates, with seat at 1 Grčkoškolska Street, Novi Sad.

In case of amendment or expansion of the list of recipients of personal data the amendments shall be presented on the website of the Insurer and available at any time.

For the insurance product My Coverage (Moje pokriće) for users of housing loans, in addition to recipients mentioned above, data shall be delivered to the following personal data recipients also:

- Reinsurance company Dunav Re a.d.o. with seat at 18/I Bulevar kralja Aleksandra, 11000 Belgrade, in case the specific insurance contract is subject to reinsurance,
- EUROP ASSISTANCE Hungary Ltd. – Branch, Belgrade, with seat at 8 Japanska Street, 11070 Novi Beograd.

For the insurance product My Coverage (Moje pokriće) for users of cash loans, in addition to recipients mentioned above, data shall be delivered to the following personal data recipients also:

- Reinsurance company Dunav Re a.d.o. with seat at 18/I Bulevar kralja Aleksandra, 11000 Belgrade, in case the specific insurance contract is subject to reinsurance.

For the insurance product My Support (Moja podrška) in addition to aforementioned recipients the data shall be delivered to the following personal data recipients:

- Reinsurance company Dunav Re a.d.o. with seat at 18/I Bulevar kralja Aleksandra, 11000 Belgrade, in case the specific insurance contract is subject to reinsurance.

For the insurance product My Safety (Moja sigurnost) in addition to recipients mentioned above, data shall be delivered to the following personal data recipients also:

- EUROP ASSISTANCE Hungary Ltd. – Branch, Belgrade, with seat at 8 Japanska Street, 11070 Novi Beograd.

For the insurance product My Recovery (Moj oporavak) in addition to recipients mentioned above, data shall be delivered to the following personal data recipients also:

- EUROP ASSISTANCE Hungary Ltd. – Branch, Belgrade, with seat at 8 Japanska Street, 11070 Novi Beograd.

For the products of collective life insurance, in addition to recipients mentioned above, data shall be delivered to the following personal data recipients also:

- Reinsurance company Dunav Re a.d.o. with seat at 18/I Bulevar kralja Aleksandra, 11000 Belgrade, in case the specific insurance contract is subject to reinsurance.

Exporting Personal Data Outside of Republic of Serbia

Personal data may be exported into the Republic of Hungary, the location of the seat of the OTP Group, Republic of Slovenia, the location of IN2 informatički inženjering d.o.o. and Republic of Italy, location of the associate Reinsurance Company Dunav Re a.d.o. taking risk from insurance contract.

Personal Data Keeping Period

In line with provisions of the Law on Insurance, the Insurer shall be obligated to keep personal data significant for exercise of rights for damage compensation, that is, payment of contracted amounts, for 10 (ten) years after the expiration of the insurance contract, and in case of occurrence of the contracted insured event, for 10 (ten) years from the determination of right to compensation from insurance.

In case the Insurer is obligated to keep personal data, based on regulations of the Republic of Serbia, longer than 10 (ten) years, for reporting or proving certain facts, this shall be done based on specific regulations.

Rights of Data Subjects

Data subjects shall be entitled to request access from the Insurer, or corrections or deletion of their personal data, as well as to limit processing, submit complaints and enable data portability, all in line with the Law on Protection of Personal Data.

Data subjects shall be entitled to a withdrawal of consent to personal data processing, at any time, where such withdrawal shall apply from the moment of delivery of the withdrawal notice to the Insurer and shall not apply to use of data prior to such withdrawal. Withdrawal may be issued only once related to data used by the Insurer based on consent, not related to data with basis for collection and processing in the law itself, that is, contract, which is the data necessary for contract execution. Withdrawal shall be sent to the Insurer in writing to e-mail address: zastita.podataka@otposiguranje.rs.

Right to Submit Complaints to the Insurer

Complaint may be submitted in writing at the premises of the Insurer, by mail at the address of OTP osiguranje ADO Belgrade, 50 a/b Bulevar Zorana Đinđića Street, 11070 Novi Beograd or in electronic form to an e-mail address zastita.podataka@otposiguranje.rs.

Submitting Complaint to the Commissioner for Information of Public Significance and Protection of Personal Data

Data subjects shall be entitled to submit complaints related to actions or omissions of the Insurer to the Commissioner for Information of Public Significance and Protection of Personal Data, with address at 15 Bulevar kralja Aleksandra Street, 11120 Belgrade, e-mail: office@poverenik.rs, telephone number: +381 11 3408 900, fax number: +381 11 3343 379.

Automated Data Processing and Profiling

Insurer shall perform automated data processing during conclusion of insurance contracts, and subsequently during management of contracts and obligations from contracts for certain processes. Regarding automated data processing, regular personal control and right to human interventions has been established, as well as the right to express dissatisfaction with such processing, leading to mandatory activity review.

Depending on the amount of insured sum and the age of the insured person, the Insurer may examine health condition of the insured person, lifestyle and financial data, based on completing the questionnaire or delivery of medical results that are necessary depending on specific case, and profiling shall be performed in such a way. During profiling, a professional shall assess the health condition of the insured person and what consequences it may have related to occurrence of insured risk that is contracted, and based on this assessment, risk shall be determined that would be taken by the Insurer during contract conclusion. Based on estimated risk the Insurer shall decide on the amount of premium responding to such risk, where it could be possible the Insurer declining to conclude an insurance contract with such estimated risk.

In case of insured event, the Insurer shall collect data on cause and circumstances of such occurrence of insured event based on medical documentation and documentation of competent authorities in which it has been entered. This data is profiled and it is assessed under which circumstances the insured event occurred and what was the health condition of the insured person at the moment of occurrence of insured event, and, based on this data, contractual provisions shall be applied and justification of the claim related to insurance shall be assessed.