

# VIG Re Privacy Notice

As the privacy of individuals is a key value to us, we are committed to respect the privacy and confidentiality of personal data that we process in connection with our services.

## Who are we?

VIG RE zajišťovna, a.s. Templová 747/5  
110 01 Prague 1, Czech Republic  
Phone: +420 956 445 505  
E-mail: [dataprotection@vig-re.com](mailto:dataprotection@vig-re.com)  
(hereinafter referred to as "VIG Re")

## What will you find in our processing notice?

This processing notice tells you what to expect when VIG Re collects your personal data. It applies to information we collect:

1. When you visit our websites
2. When you interact with us (on social media or via e-mail)
3. When you apply for a job position
4. When we obtain your personal data in connection with providing reinsurance services

## 1. When you visit our websites

When you visit our website we use cookies, small text files that are stored on your computer or mobile device. Cookies may store information such as IP address or another identifier. Cookies cannot damage your computer and do not contain any sensitive information nor viruses. A mix of first-party and third-party cookies are used.

For more information on how we use cookies and how to switch them off or manage your consent, please see our [Cookies Policy](#).

For further information on Google's use of data, visit <https://policies.google.com/privacy>

For further information on LinkedIn's use of data, visit: <https://www.linkedin.com/legal/privacy-policy>

## 2. When you interact with us (on social media or via e-mail)

If you like or follow any of our social media accounts, we will collect information about this. We use this information for legitimate business purposes only. We monitor the data to understand how people use information we publish on social media. You can change your settings within your social media accounts to set how organisations can target social posts to you, through them.

If you send us a private or direct message via social media, the message will not be shared with any other organizations.

The e-mail address you provide will be used by VIG Re to reply to you with the information you request. Any sensitive confidential information will be encrypted or, if this is not possible, sent to you by regular mail. If the contents of the e-mail refer to a contractual relationship, VIG Re will save the e-mail. The e-mail address will be saved exclusively for corresponding with you, and not disclosed to third parties. You will never receive an unsolicited e-mail from us. As a result, should you nevertheless receive any unsolicited e-mail that purports to be from us, it is fraudulent and should be deleted. Before you send VIG Re an unencrypted e-mail, please remember that its contents are not protected against unauthorised access or manipulation. For this reason, we recommend using our contact form to send any messages to VIG Re.

### 3. When you apply for a job position

#### Which personal data do we process?

We process the following personal data:

- a) **Identification data**, which means, in particular, first name, surname, title, date of birth and sex;
- b) **Contact data**, which means personal data that allows us to contact you, in particular contact address, telephone number, e-mail address, Linked-In profile;
- c) **Data related to the execution of work**, which means, in particular, information on your education, the training you have undergone, previous experience and references;
- d) **Data on our evaluation of your suitability**, which means an assessment of suitability and the results of tests.

#### Why do we process personal data and what authorises us to do so?

We process personal data for different purposes and to different extents during the recruitment process. We process personal data as one of the steps leading to entering into a contract, in our legitimate interests and, where appropriate, with your consent.

#### **Processing without your consent – as one of the steps leading to entering into an employment contract**

Among the steps which lead to **entering into an employment contract**, we process your **identification and contact data, data relating to the execution of work and data on our evaluation of your suitability**; this we do for the purpose of *assessing employment candidates and undertaking the recruitment process*. Specifically speaking, we do this so as to be able to invite you to interview and communicate with you and so that we can use the documents provided to assess your suitability for the vacant employment position.

We process personal data for such purposes for the duration of the recruitment process, but not more than 6 months; if you want us to retain your personal data in the database of candidates even following the end of the recruitment process, we will require your consent for this matter.

#### **Processing without your consent – in our legitimate interest**

We process your **identification and contact data, data relating to the execution of work and data on our evaluation of your suitability** in our legitimate interest for the purpose of *protecting our legal rights*. You may lodge an objection to such processing at any time; this you may do in the way described in more detail in the section entitled “The right to object to processing”.

We process personal data for these purposes for the duration of the limitation period (a maximum of 15 years following the end of the recruitment process) of rights arising from or relating to the recruitment process, extend by one year with regard to protecting our legal rights. In the event that judicial, administrative or other

proceedings are commenced, we process your personal data to the required extent for the full duration of such proceedings.

### **Processing with your consent for the purposes of maintaining a database of candidates of VIG Re**

When we have your consent, we process your **identification and contact data and data relating to the execution of work** so that we are able to contact you as required with another relevant job offer. If you do not provide consent, we will only process such data to the end of the recruitment process (maximum of 6 months since you gave us your consent). If you provide consent, we will process such data for a maximum period of 3 years following the end of the recruitment process.

You may **withdraw** the consent you have provided; however, withdrawal of consent does not affect the lawfulness of processing personal data until the time of withdrawal. You may withdraw consent by sending an e-mail to: [dataprotection@vig-re.com](mailto:dataprotection@vig-re.com), or in writing by sending a letter to: *VIG RE zajišťovna, a.s., Templová 745/5, 110 01 Prague 1.*

### **Processing the personal data of third parties**

We also process, without their consent, the **identification and contact data of persons** who are stated as contact persons in references, for the purpose of *assessing employment candidates*; this we do in our **legitimate interest**. We process such information for the duration of the recruitment process.

### **Who processes your personal data and to whom do we transfer it?**

We process all the personal data specified as the controller. This means that we determine the purposes for which we collect your personal data defined above, we determine the means of processing, and we are responsible for its proper execution.

We also use the services of processors to process personal data; these processors process personal data at our instruction. Our main **processor** is Kooperativa pojišťovna, a.s., Vienna Insurance Group, (Company Number: 47116617), which undertakes personnel and payroll administration work for us, IT solution suppliers, in the case of processing personal data about employment candidates within the recruitment process, and consultancy companies, which help us evaluate whether you are a suitable candidate for us (for example, assessment centres).

We are also obliged to transfer processed personal data to the authorities of public administration, to courts, to law enforcement bodies and to supervisory authorities in the case that they require this of us.

### **From which sources do we obtain personal data?**

We mostly obtain personal data directly from you when you provide us with it during the recruitment process, either at an interview in person, in your CV or in other documents.

In addition to this, we obtain and process, to a limited extent, personal data obtained from persons who are specified as contact persons in your references and from publicly available sources, meaning public records (for example, the register of insolvency), invariably in accordance with the statutory requirements.

### **What are your rights in terms of personal data processing?**

Just as we have our rights and obligations in terms of processing your personal data, you too have certain rights when we process your personal data. These rights include:

#### **a) Right of access**

Put simply, you have the right to know whether and which data we hold and process relating to you, to which end, for what period of time, where we obtain your personal data, to whom we transfer it, who apart from us

processes it and which other rights you have in relation to processing your personal data. If, however, you are unsure which personal data about you we are processing, you can ask us for confirmation of whether personal data to concern you is or is not processed by us and if it is, you have the right of access to such personal data. As part of the right of access, you can ask us for a copy of the processed personal data, in that we provide the first copy without charge and any further copies for a fee.

**b) Right to rectification**

To err is human. If you discover that the personal data we have processed about you is inaccurate or incomplete, you have the right to demand that we rectify or supplement it without delay.

**c) Right to erasure**

Under certain circumstances, you have the right to demand that we erase your personal data. We will erase your personal data without undue delay if any of the following grounds to do so exists:

- we no longer require your personal data for the purposes for which we processed it;
- you withdraw consent to personal data processing, if such data is data whose processing requires your consent and, at the same time, we have no reason to process such data any longer (for example, to defend your legal claims);
- you exercise your right to object to processing (see the “The right to object to processing” section below) in relation to the personal data which we process in our own legitimate interest and we find that we no longer have any such legitimate interest that would justify such processing; or
- you believe that the personal data processing which we conduct is no longer compliant with generally binding regulations.

However, please remember that even if one of these reasons exists, it does not mean that we will immediately erase all your personal data. This right does not apply in the case that the processing of your personal data is still required for:

- fulfilling our legal obligations;
- the purposes of archiving, scientific or historical research or for statistical purposes; or
- establishing, exercising or defending our legal claims (see the “Processing without your consent – in our legitimate interest” section above).

**d) The right to withdraw your consent.**

You can withdraw your consent at any time in case your personal data are processed with your consent.

**e) The right to restriction of processing**

In certain cases, you may exercise the right to restriction of processing personal data instead of the right to erasure. This right makes it possible for you, in certain cases, to demand that your personal data be marked and not be subject to any further processing operations – in this case, however, not forever (as in the case of the right to erasure), but only for a limited period of time. We must restrict the processing of personal data when:

- you contest the accuracy of personal data, for a period enabling us to verify the accuracy of the personal data;
- we process your personal data without sufficient legal basis (for example, beyond the scope of that which we must process), but you favour the restriction of data over the deletion of such data (for example, if you expect that you would provide us with such data in the future in any case);
- we no longer need your personal data for the purposes of the processing specified above, but you require it for the establishment, exercise or defence of your legal claims; or

- you have objected to processing. The right to object is described in more detail in the section entitled “The right to object to processing”. We are obliged to restrict the processing of your personal data for the period of time during which we investigate if your objection is justified.

#### **f) The right to data portability**

You have the right to obtain from us all personal data which you have provided us with yourself and which we process with your consent (see above, “Processing with your consent”) or based on performance of a contract. We will provide you with your personal data in a structured, commonly used and machine-readable format. To make it easy for us to transfer data at your request, this data may only be data which we process by automated means in our electronic databases. This means that we cannot always and under all circumstances transfer in this way all data which you entered in our forms (for example, your handwritten signature).

#### **g) The right to object to processing**

You have the right to object to the processing of personal data which occurs in our legitimate interest (see the section “Processing without your consent - in our legitimate interest” above). We will no longer process your personal data for the stated purpose in this case, if we do not have serious, legitimate reasons to continue with such processing. We may reject your request if the processing of your personal data is needed to establish, exercise or defend legal claims.

#### **h) The right to lodge a complaint**

Exercising rights in the way specified above does not in any way affect your right to lodge a complaint with Úřad pro ochranu osobních údajů (Office for Personal Data Protection) in the way specified below in the section entitled “How to exercise individual rights”. You can primarily exercise this right in the case that you suspect us of processing your personal data in an unauthorised way or in breach of generally binding legal regulations.

### **How can you exercise your individual rights?**

You can contact our **Data Protection Officer** with all matters relating to the processing of your personal data, whether you wish to make an inquiry, exercise a right, lodge a complaint or anything else.

Our Data Protection Officer can be contacted in any of the following ways:

- in an e-mail sent to: [dataprotection@vig-re.com](mailto:dataprotection@vig-re.com)
- by phone: +420 956 445 549
- in writing in a letter sent to: *VIG RE zajišťovna, a.s., Templová 745/5, 110 01 Prague 1*

We will handle your request without undue delay, and within a maximum of one month. In exceptional cases, in particular if your request is complicated, we are authorised to extend this time limit by a further two months. We will, of course, inform you of any such extension and of the reason for this.

### **Where can you lodge a complaint?**

You can lodge a complaint against the personal data processing which we undertake with Úřad pro ochranu osobních údajů (Office for Personal Data Protection), which has its registered office at Pplk. Sochora 27, 170 00 Prague 7.

## **4. When we obtain your Personal data in connection with providing reinsurance services**

Our services consist in providing reinsurance cover to other insurance or reinsurance companies. Reinsurance is a mechanism through which insurers can manage risks by shifting or ceding one or more

insured risks to reinsurers in exchange for payment of premiums. For the purpose of further risk spreading, we may also make use of other reinsurers.

To be able to provide reinsurance services, which consists mainly of providing reinsurance cover and handling reinsurance claims we are sometimes required to use and share personal data. We do not have a direct relationship with you as a data subjects. We receive personal data mainly through insurance companies seeking insurance cover, or through reinsurance brokers.

## Where might we collect your personal data from?

We do not have a direct relationship with you as a data subject. We may receive your personal data in case that the insurance company with which you intend to conclude or have concluded an insurance contract or have claims under an insurance contract as an insured person, beneficiary or injured party will cede part of its risks from the insurance contract to us. In such case we may receive your contract and/or claims data where this is necessary for the purposes of providing reinsurance cover.

We receive personal data through:

- insurance companies who have concluded an insurance contract with you (e.g. car insurance policy, life insurance policy, health insurance policy);
- reinsurance brokers, i.e. intermediaries used by insurance and reinsurance companies especially in the process of purchasing reinsurance and claims administration;
- other reinsurance companies seeking retrocession (reinsurance companies seeking insurance).

## How can we use your personal data and based on which legal grounds?

According to the General Data Protection Regulation (hereinafter as "GDPR"), we are allowed to process personal data only if the processing is permitted by the specific legal basis (legal grounds) set out in the GDPR.

Purpose of processing	Description of the processing purposes	Categories of personal data	Legal grounds
<b>Underwriting of the risk to be covered</b>	assessment and evaluation of the new risk to be covered, or reassessment of the conditions of the risk already covered after the expiration of the contract	- personal data - <i>special categories of personal data (especially health conditions) in a very limited scope</i>	- legitimate interest - <i>your consent</i>
<b>Administration of the reinsurance contract</b>	collection of premiums, processing other payments	- personal data	- legitimate interest
<b>Claims management</b>	In some cases we might need your personal data for managing and defending legal claims.	- personal data - <i>special categories of personal data (especially health conditions) in a very limited scope, mostly pseudonymised</i>	- legitimate interest - <i>to establish, defend or prosecute legal claims</i>
<b>Retrocession</b>	Cession of already accepted risk to other reinsurers.	- personal data - <i>special categories of personal data</i>	- legitimate interest - <i>your consent</i>
<b>Risk modelling</b>	building risk models that allow accepting of risk with appropriate premium	- personal data	- legitimate interest

<b>Complying with our legal or regulatory obligations</b>	We might process your personal data in order to meet statutory requirements such as supervisory law requirements or fiscal law.	- personal data	- compliance with legal obligations - legitimate interest
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## The personal data we may collect about you

For the purposes mentioned above we may typically process your personal data as stated under.

Individual details: Name, address, other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, employer, job title, relationship to the policyholder, insured, beneficiary or claimant;

Identification details: identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving license number;

Financial information: very rarely and in a very limited scope regarding your financial information policy information – information about the quotes you receive and policies you take out;

Special categories of personal data – in some very rare cases and in a very limited scope we might process personal data which have additional protection under the GDPR – in particular personal data connected to your health conditions.

## To whom we might transfer your personal data?

### Business partners

We might transfer your personal data very rarely and in a limited scope to our business partners:

- when we pass on a portion of the risks reinsured with us in order to spread the risk further or
- in connection with claims management (when our reinsurer is supposed to participate on the particular claim payment).

Our business partners are:

- additional reinsurance companies,
- reinsurance brokers who are used by us or other insurance or reinsurance companies to initiate and manage the reinsurance relationship.

### External Service providers and advisors

In rare cases we might disclose your personal data to our external service providers, especially to our IT service providers. In some rare cases we could share your personal data with our auditors, reinsurers, medical agencies and legal advisers.

### Legal authorities

In very rare cases and in a limited scope we might disclose your personal data if we are required to do so by law, especially to the supervisory authority, other regulatory body, or external auditors.

## Can your personal data be transferred across geographies?

Your personal data can be transferred to our business partners or service providers outside of the Czech Republic, especially to the countries of the European Economic Area (EEA), or countries where the EU Commission has confirmed that the third country has an appropriate level of data protection. When a transfer outside the above mentioned countries should occur, this would always be made in compliance with the GDPR, including establishing legal grounds justifying the transfer.



## **What are the security measures VIG Re has in place to protect your personal data?**

We have in place reasonable physical, technical and administrative security safeguards appropriate to the sensitivity of the information we maintain. These safeguards protect the personal data from loss, misuse, alteration or destruction. These safeguards include but are not limited to communication via VPN, encryption of communications via SSL, encryption of information during storage, firewalls, access controls and similar security protocols. We restrict the access to personal data only to those employees who require it based on adequate and relevant purposes.

## **How long do we store your personal data?**

We will delete your personal data as soon as it is no longer required for the processing purposes for which the information was collected. We retain certain personal data until the time limit for claims arising from the transaction has expired. We also store personal data if we are legally obliged to do so. Such statutory limitation period can range up to thirty years. When personal data is no longer needed, we either irreversibly anonymize the data or securely destroy the data.

## **What are your rights connected with your personal data processing?**

You can contact us if you wish to exercise your following rights:

- provide further details on how we use and process your personal data,
- request information on personal data we maintain about you,
- update any inaccuracies in the personal data we process about you,
- request that your data is rectified or deleted subject to specific requirements,
- under certain conditions withdraw your consent for personal data processing or object to any processing of personal data justified on the legitimate interests legal grounds.

## **Who can you contact?**

To submit questions regarding personal data processing or if you wish to exercise your rights in connection with your personal data processing you can write us at the following address:

VIG RE zajišťovna, a.s. Templová 747/5  
110 01 Prague 1, Czech Republic  
Email: [dataprotection@vig-re.com](mailto:dataprotection@vig-re.com)

We will handle your request without undue delay, and within a maximum of one month. In exceptional cases, in particular if your request is complicated, we are authorised to extend this time limit by a further two months. We will, of course, inform you of any such extension and of the reason for this.

## **Where can you lodge a complaint?**

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