



## IRIS GLOBAL PROTECTION SOLUTIONS SEGUROS Y REASEGUROS, SAU

### PRIVACY POLICY

#### Introduction:

The entity IRIS GLOBAL SOLUCIONES DE PROTECCION SEGUROS Y REASEGUROS, SAU makes available to users of the website [www.irisglobal.es](http://www.irisglobal.es), of our clients and policyholders, and of all those interested, this Privacy Policy, in order to Comply with the regulations for the protection of personal data and the obligation of the duty to inform, explaining below the treatment that we can give to the personal data that they provide and treat us.

It is our goal to provide this information using clear and simple language. For this reason, we have chosen to structure all the information using a “questions and answers” format:

#### 1.- Who is responsible for the processing of your personal data?

The data controller is **IRIS GLOBAL PROTECTION SOLUTIONS SEGUROS Y REASEGUROS, SAU** with CIF A78562246 (hereinafter GLOBAL IRIS INSURANCE), with address at Julian camarillo 36, 28027, Madrid. However, in certain processing activities we act as data managers. By way of example, when you contract one of our products such as Travel Assistance Insurance for individuals, we will act as those responsible for the processing of personal data.

#### 2.- Are we always responsible for the processing of your personal data?

As we have already mentioned, this is not always the case. IRIS GLOBAL SEGUROS is also a reinsurance company that manages different guarantees assigned by other insurers and that provides different services to our clients. Consequently, we can also act as those in charge of the treatment, carrying out a treatment on behalf of a person in charge of the treatment to attend a contracted service. Acting in the position of data controllers, under no circumstances implies that we avoid any type of responsibility for compliance with data protection regulations.

### 3.- Who is the Data Protection Officer?

IRIS GLOBAL SEGUROS has formally appointed a **Data Protection Officer** which is structured as a collegiate body. In addition, the following communication channel is enabled: [Dpo.Spain@mail.irisglobal.es](mailto:Dpo.Spain@mail.irisglobal.es). The contact details of the Data Protection Delegate have been duly communicated and registered with the Spanish Data Protection Agency, the control authority of Spain.

### 4.- For what purposes do we treat the personal data that we receive and provide us with?

As it has been developed in different Guides of the Spanish Union of Insurance and Reinsurance Entities (UNESPA) from which we are inspired, insurance entities to develop their business activities must necessarily process personal data in different phases, especially in what corresponds to the insurance contract and its guarantees. Prior to the conclusion of the contract, the insurance companies collect data to analyze whether or not the risk is insurable and, if it is within the insurance parameters (homogeneity of risks), data processing is necessary to determine the what conditions and at what price the risk can be assumed. Once the contract is concluded, the data is essential for the maintenance, development and execution of the contract, as well as for the fulfillment of the obligations derived from the insurance activity. Therefore, we distinguish between two phases of personal data processing: the pre-contractual and the contractual.

Consequently, we treat the personal data that we have, for the purposes of the management and administration of the entities - such as to manage the selection processes that may be in progress, the administration and management of the corresponding systems, or for sending and receiving correspondence-, for other purposes of a business activity, and also for the following purposes related to the insurance activity<sup>1</sup>:

#### A. In Pre-contractual Phase:

- Management of the request and offer of the insurance product that best suits the demands and needs of the client.
- Assessment, selection and pricing of risks associated with the application.
- Communicate information to public authorities, regulators or government bodies in those cases in which it is necessary to do so by law, local regulations or in compliance with regulatory obligations.

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<sup>1</sup> In accordance with the UNESPA guidelines in the "Guide for the processing of personal data by insurance entities "(February 7, 2019) on  
< <http://www.unespa.es/quehacemos/autorregulacion/> > access in June 2019.

- Carry out the corresponding checks in accordance with the provisions of current Spanish legislation on the prevention of money laundering and terrorist financing.
- Consultation of common risk selection and pricing files.
- Communication of the data of the policyholder, insured, beneficiary or injured third party to reinsurance entities when necessary for the conclusion of the reinsurance contract in the terms provided in article 77 of Law 50/1980, of October 8, on the Insurance Contract, the receipt of the same data from the insurance company that carries out the assignment under the same terms, or the performance of the related operations.
- Fraud prevention.

#### **B. In Contractual Phase:**

- Formalization of the insurance contract - Contract details; Need to obtain personal data for the formalization of the contract.
- Management of the policy or of certain guarantees granted as reinsurance, as well as maintaining, developing and controlling the legal and / or contractual relationship that may be established between the parties. For example, to manage data modifications and updates, banking information, coverage extensions, etc.
- Carry out the necessary verifications and investigations for the determination and, where appropriate, the payment of compensation to the insured, the beneficiary or the injured party.
- Make communications related to the policy.
- Manage the resolution of complaints and conflicts that may arise between policyholders, policyholders, beneficiaries, injured third parties or beneficiaries of any of them.
- Keep the accounting books required by the Commercial Code and other applicable provisions, as well as the records of accounts, claims, technical provisions, investments, reinsurance and policy contracts, supplements and cancellations issued.
- Communicate information to public authorities, regulators or government bodies in those cases in which it is necessary to do so by law, local regulations or in compliance with regulatory obligations.
- Carry out commercial and / or advertising actions or communications, by any means, including electronic or equivalent communications in accordance with the provisions of Law 34/2002, of July 11, on information society services and electronic commerce, related with products or services similar to those contracted.
- Communication of the data of the policyholder, those of the insured, beneficiary or injured third party to insurance companies, or reinsurance companies when necessary for the conclusion of the reinsurance contract.
- Intragroup Transfer: Exchange of intragroup information between insurance companies for the fulfillment of supervisory obligations.
- Centralized management of intra-group computing resources, such as applications or servers.

- Carry out commercial and / or advertising actions or communications, by any means, including electronic or equivalent communications in accordance with the provisions of Law 34/2002, of July 11, on information society services and electronic commerce, related with products or services other than those contracted or products offered by third parties through profiling with external sources.
- Fraud prevention and detection.
- Determine the health care, and the compensation that the injured party should receive, when they have to be satisfied and carry out, where appropriate, the corresponding medical health examination by a doctor or hospital center.
- Make the appropriate payment to the health providers or the reimbursement to the insured or their beneficiaries of the health care expenses that have been carried out within the scope of this insurance.

## 5.- What is the legitimacy and legality conditions that we apply to the processing of your personal data?

The legal basis for the processing of your personal data is based on the following legality conditions, which could be accumulated depending on each specific case:

- The **development and execution of the contract or service** that corresponds, or the application of pre-contractual or contractual measures that proceed. The provision of the service in accordance with the guarantees described in the contracted policies, being able to intervene different providers for the effective execution of the provision of the service, or depending on the contracts that have been formalized between our clients and our entities, would legitimize the treatment of personal data of the interested parties that we carry out. Likewise, we rely on this legal basis when we act as reinsurer, in accordance with the reinsurance contracts that we have with our clients. The purposes that would be adjusted within this legitimation base have already been developed and referred to in the previous section.
- The **compliance with legal obligations** that are applicable to IRIS GLOBAL SEGUROS, as a company that is part of the insurance sector, whose applicable regulations for the performance of its activities and obligations are the following:
  - ☐ Commission Delegated Regulation (EU) 2015/35, of October 10, 2014, which completes Directive 2009/138 / EC, as well as the EU solvency enforcement regulations II.
  - ☐ Law 50/1980, of October 8, on the Insurance Contract (LCS).
  - ☐ Law 20/2015, of July 14, on the management, supervision and solvency of insurance and reinsurance entities (LOSSEAR).

- ☐ Royal Decree 1060/2015, of November 20, on the management, supervision and solvency of insurance and reinsurance entities (RDOSSEAR).
  - ☐ Royal Legislative Decree 8/2004, which approves the revised text of the law on civil liability and insurance in the circulation of motor vehicles (Law on RC Automobiles).
  - ☐ Law 26/2006, of July 17, on insurance and reinsurance mediation (Mediation Law).
  - ☐ EU Directive 2016/97 on the distribution of insurance (DDS).
  - ☐ Royal Decree 1588/1999, of October 15, approving the Regulation on the implementation of pension commitments of companies with workers and beneficiaries (Instrumentation Regulation).
  - ☐ Delegated Regulation (EU) 2017/2358, of September 21, which completes Directive 2016/97 with regard to the control and governance requirements of insurance products (POG Regulation).
- The **legitimate interest** of IRIS GLOBAL SEGUROS, for example, for the assessment, analysis and pricing of risks, for the prevention of fraud or for the prevention and / or detection of money laundering and / or terrorist financing activities. We also invoke this condition for the treatment of health data in order to assess the damages, for the settlement of claims, the risk assessment and, where appropriate, any other activities derived from the management and processing of the insurance contract. and / or the legal or contractual relationship formalized, in the terms provided in article 77 of the LCS, or for the performance of related operations that are necessary. Also this legitimizing basis would empower us to carry out the following treatments:
  - ☐ Carry out commercial and / or advertising actions or communications, by any means, including electronic or equivalent communications, related to products or services similar to those contracted.
  - ☐ Intragroup Transfer: Exchange of intragroup information between insurance companies for the fulfillment of supervisory obligations.
  - ☐ Centralized management of intra-group computing resources (applications, servers).
  - ☐ Transfer (and acquisition) of Portfolio, merger, spin-off, transformation, etc.
- The fulfillment of a mission carried out in **public interest** or in the exercise of public powers conferred on the data controller; such as, for example, for the prevention of fraud, or for collaboration with the State Security Forces and Corps.
- At **consent** that we request for different treatment purposes, such as to carry out actions or commercial and / or advertising communications that may be of interest to our clients, policyholders and the general public, either about our products or services that we offer, or about products and / or services of third parties.

entities with which IRIS GLOBAL INSURANCE establish collaboration agreements. In the same way, we ask for consent to be able to carry out evaluations of the client's profile, and apply segmentation techniques with internal and / or external data, in order to introduce improvements in the communications we make and offer offers of products and services appropriate to your needs, even after the relationship is over.

## **6.- How do we obtain your personal data?**

The sources from which the personal data come are:

- Provided by you and / or by those interested in the insurance application or for the formalization of the legal or contractual relationship.
- Of the own management, maintenance and development of the legal or contractual relationship, in relation to the insurance contract.
- In the processing of claims derived from the insurance contract.
- Provided by our clients, or according to the exchange and transfer of intra-group information between insurance companies.
- Data from sources accessible to the public or public records. For example, when we process certificates before Registries.
- Data obtained from external sources. For example, data provided by IRIS GLOBAL SEGUROS providers, third-party databases, different social networks, etc.

Having said the above, we inform you that, in the event of obtaining your data from external sources, they will be treated exclusively for the purposes described in this Policy, this document serving as sufficient informational means in relation to the treatment we do to this data, and of the conditions of treatment that we carry out of the data of external sources. A new informative text will not be sent in such cases, unless expressly requested by the communication channel that appears in this document.

## **7.- To which recipients will your personal data be communicated?**

The personal data processed by IRIS GLOBAL SEGUROS to achieve the detailed purposes and in accordance with the conditions of legality explained above, could be communicated to the different recipients, especially with the aim of guaranteeing the correct development of the contractual relationship with our clients and thus provide the appropriate service in each case. In this sense, in addition to having to provide personal data by legal imperative in the event of an official requirement from a public body, it is necessary for us to work with a network of national and international suppliers and collaborators to achieve our objectives. Therefore, in short, it is necessary for us to communicate personal data to different collaborators and

For the purposes of it being a legitimate communication, we request consent, and we communicate it - whenever necessary - to the following recipients:

- To collaborating entities, public or private, that intervene in the management of the insurance contract (reinsurance entities, coinsurance or intervening in the management of the policy, providers), these may be national, community at European level, or international located in third parties countries, as in the case of having to provide travel assistance abroad, for example.
- To companies of the same group or intragroup of insurance entities for the fulfillment of supervisory obligations.
- To Public Organizations and Administrations, in compliance with legal obligations or for the management of the services of the insurance contract or that are requested.
- To possible third parties interested in the processing and management of claims derived from the execution and development of the insurance contract (interested parties, injured parties, beneficiaries, etc.), provided that the communication of data is strictly necessary.

We want to warn that your personal data will only be communicated to third parties when it is strictly necessary to achieve the purposes described above, taking into account compliance with the principles relating to the treatment of legality, loyalty and transparency, data minimization, purpose limitation, and of integrity and confidentiality that are included in Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data (RGPD or General Data Protection Regulation) and related and applicable data protection regulations.

In addition, we inform you that we have legal instruments that guarantee the adequate and appropriate communication of personal data, such as standard data protection clauses, codes of conduct and ethics for suppliers, or different contracts of data processor both with our clients, as well as our suppliers.

#### 8.- What types of data do we process?

As long as the contractual relationship remains in force, at IRIS GLOBAL SEGUROS, and depending on the specific case, we may process the following personal data:

- Identifying personal data** ( for example, name and surname, and NIF / NIE number).
- Contact information** ( for instance, postal and electronic address, telephone, etc.).

- ❑ **Personal characteristics and social circumstances** for example, age, date of birth, marital status, characteristics of your home, number of inhabitants of your home, etc.).
- ❑ **Special category data** ( for example, health data)
- ❑ **Academic, employment and professional data** ( for example, employment status, whether you are employed or unemployed, your general or specific training, etc.).
- ❑ **Economic, financial or insurance data** ( for example, your bank account number, policy and line number, etc.).
- ❑ **Data of deceased persons** ( for example, data for the processing of different pensions or Civil Registry certificates, etc.).
- ❑ **Data related to infractions and administrative sanctions** ( related to infractions and administrative sanctions, etc.)
- ❑ **Data of legal persons** ( for example, the company name, your address, etc.).
- ❑ **Data from individual entrepreneurs and liberal professionals**
- ❑ **Location data** ( for example, the destination where the insured travels, where they need assistance, etc.).
- ❑ **Commercial information and consumer data** ( for example, through the browsing experience of our website, to carry out advertisements and segmentations, etc.)

Likewise, we inform you that IRIS GLOBAL SEGUROS could treat **personal data of other people** that are covered by the policy (for example, relatives and friends), exclusively if necessary for the management of the purposes of the insurance contract. In the event that you have provided personal data of third parties, we remind you that by formalizing the insurance request you must guarantee that you have obtained the consent of said persons for the processing of personal data carried out by IRIS GLOBAL SEGUROS in relation to the execution and development of the insurance contract, as well as that it should have informed said persons of the rights that assist them and the purposes of data processing. In the same way, the treatment of the personal data of third parties that are related to the request that is formalized,

In the case of minors, we indicate that we do not deliberately collect information from minors under 18 years of age either through online services or on our website. For the collection of data from minors we require the authorization and consent of the holder of parental authority or guardianship over the minor. In this case, we could request accreditation as the minor's legal representative for the processing of their personal data.

Finally and especially, we inform you that, for the execution of the policy or services requested, the **treatment of your health data** ( for example, health data that could be derived from the processing of a claim or, where appropriate, data necessary for risk assessment), or from **special category** ( for example, that reveal ethnic origin or



racial, or union affiliation). We remind you that we will only treat this category of personal data by requesting the corresponding informed consent, only for the purposes of the execution of the insurance contract or the services that our company could provide that require the treatment of this type of data and, exclusively, in case it is legitimized to do so.

### **9.- How long do we keep your data?**

Personal data will be kept during the term of the contract and, subsequently, taking into account the legal deadlines that are applicable in each specific case, the type of data and the purpose of the treatment.

You can request more information about the data retention periods at:

[data.protection@mail.irisglobal.es](mailto:data.protection@mail.irisglobal.es)

### **10.- What are your rights in relation to the treatment we do of your data?**

We inform you that you have the right to access your personal data and obtain confirmation on how said data is being processed. You also have the right to request the rectification of inaccurate data or, where appropriate, request its deletion when, among other reasons, the data is no longer necessary for the purposes for which it was collected.

We remind you that you have the right to object, at any time, to the processing of your data for advertising or promotional purposes.

In certain circumstances, you may request the limitation of the processing of your data, in which case we will only keep it for the exercise or defense of possible claims.

Likewise, also in certain circumstances, you may oppose the processing of your personal data for the stated purpose, without affecting the legality of the processing based on prior consent. In this case, our company will stop processing personal data, unless there are legitimate reasons, or to guarantee the exercise or defense of possible claims.

Finally, you may exercise the right to portability and obtain for yourself or for another service provider certain information derived from the contractual relationship formalized with our entities.

You can exercise such rights through:

- Letter addressed to IRIS GLOBAL SEGUROS Y REASEGUROS, SA at the postal address Julian camarillo 36, 28027, Madrid.
- Written managed to the address from email [data.protection@mail.irisglobal.es](mailto:data.protection@mail.irisglobal.es)

In both cases, it is required to prove the identity of the person exercising their rights, by sending a copy of their DNI, NIE, Passport or equivalent document, on both sides.

Upon receipt of your request, we will provide you with the requested information within a maximum period of one month from receipt of the request. This period may be extended for another two months if necessary, taking into account the complexity and number of requests.

We also inform you that you can withdraw consent at any time, in the event that consent has been granted for a specific purpose, without affecting the legality of the treatment based on the consent prior to its withdrawal.

Finally, you also have the right to file a claim with the Spanish Data Protection Agency, the competent control authority for data protection. However, in the first instance, you may file a claim with the Data Protection Officer, who will resolve the claim within a maximum period of two months.

## **11.- Modifications to this Privacy Policy**

This Policy is periodically reviewed and is subject to possible modifications, to ensure that it complies with current regulations. We will inform you of such changes before they take effect, usually through our website. This Policy does not generate any type of contractual or legal responsibility, it only has the objective of explaining the treatment of the personal information that we have for the provision that proceeds, and also offering you the necessary information for the exercise of your data protection rights.

## **12.- Adherence to privacy and compliance policies**

IRIS GLOBAL PROTECTION SOLUTIONS SEGUROS Y REASEGUROS, SAU is an entity located in Spain, which is part of the SANTALUCÍA GROUP, the leading national group in the insurance sector in the Assistance and Burial lines, as well as one of the leading companies in Home Insurance. Being part of the SANTALUCÍA GROUP guarantees an optimal information security framework and offers more guarantees of compliance with data protection.

### **13.- Doubts regarding our Privacy Policy or questions related to data protection.**

For any doubt, query or clarification regarding this Privacy Policy or about the treatments we carry out to the personal data that we have, or to resolve any discrepancy with respect to how we protect and use the personal data of the interested parties, we offer the following channel of communication where they can direct their requests:

[data.protection@mail.irisglobal.es](mailto:data.protection@mail.irisglobal.es) The staff responsible for managing all these requests will answer as soon as possible.