

REPORT ABOUT NATURAL PERSONS IN ACCORDANCE WITH ARTICLES 13 AND 14 OF THE REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 27 APRIL 2016 (HEREINAFTER THE “REPORT”)

Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the “**Report**”) contains a set of rules intended to guarantee that the processing of the personal data is developed with due respect for fundamental rights and freedoms of natural persons. The provisions are adopted in this report.

SECTION 1 – IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

Intesa Sanpaolo Life dac., an Irish company authorized to pursue the insurance activity and regulated by the Central Bank of Ireland, registered in the Register of Irish company with no. 284248 and headquarters in 1st Floor, International House, 3 Harbourmaster Place, IFSC - Dublin D01 K8F1, Ireland (hereinafter the “**Company**” or the “**Processing Holder**” or the “**Holder**”), belonging to the Group Intesa Sanpaolo and operating in Spain under the freedom of services, processes Your personal data (hereinafter the “**Personal Data**”) as the processing holder for the purposes stated in Section 3 of this report, subject to the Regulation, the Irish and Spanish legal and regulatory provisions that enforce it and possible codes of conduct which are applicable. For more information please visit the Company’s website www.intesasanpaololife.ie and, particularly, the section “Privacy” with all the information relating to the use and processing of Personal Data.

SECTION 2 – CONTACT DETAILS OF THE DATA PROTECTION OFFICER

The Company has appointed the “data protection officer” provided by the Regulation (called “**Data Protection Officer**” or “**DPO**”). For all the questions relating to the processing of Your Personal Data and/or to exercise the rights provided by the same Regulation, listed in Section 7 of this report, please contact the DPO at the following email address: dpo@intesasanpaololife.ie

SECTION 3 – CATEGORIES OF PERSONAL DATA, AIM AND LEGAL BASE OF THE PROCESSING

Categories of Personal Data

In the course of its business, the Company processes, for example, personal data, contact details (email address, telephone number, etc.), data relating to payment provisions, data derived from websites, as well as the defined data specific of the Regulation, see Section 8 of this report (e.g. health data and biometric data in case of use of graphometric signature), of the parties involved in the insurance contract (contracting party, insured person, applicant for a quotation or an estimate, proposer, beneficiary and/or their possible representatives), to whom this report is intended.

Purpose and Legal Base of the Personal Data Processing

Personal Data concerning you, that You have communicated to the Company or that have been obtained from third parties¹ (in this latter case the observance of the conditions for the legality of

¹ For example, insurance intermediaries, other insurance operators, policyholders of contracts where You are the insured person or the beneficiary, possible co-obligated subjects, individuals to whom we request information or who are obliged to communicate information to us in order to satisfy your requests (for example, the issue or renewal of an insurance cover, the settlement of claims, etc.); associative bodies and consortiums of the insurance sector, etc.); Judiciary, Forces of Order and other public parties.

third parties shall be previously verified), are processed by the Company within its cope of activity with the following purposes:

a) Conclusion, execution and management of the contracts, that is, provision of the services requested

The processing of Your Personal Data is necessary to assess the insurance proposal, including all the acts relating to the pre-contractual stage, the celebration, execution and management of the contracts of which the person concerned is a party, that is, to provide the services requested by the interested party. Refusal to provide data implies the impossibility for the Company to execute the adopted pre-contractual measures, to conclude the contract, that is, if it has been concluded already, to execute it or otherwise comply with what was requested.

Within the scope of such processing purpose your consent is not required, except for the processing of the defined as special data in accordance with the Regulation of Section 8 of this report.

b) Compliance with national and Community provisions

It is necessary to process Your Personal Data in order to comply with legal provisions and your consent is not required.

The processing is necessary to comply with legal obligations to which the processing holder is subject, such as those arising from the legislation relating to AML, prevention of terrorism financing, taxation, anticorruption, prevention of fraud and tax evasion within the insurance services or in order to comply with the provisions of the applicable legislation or requests from the supervisory and monitoring authority.

In this area, to name an example, the Company may have to define the client's risk profile in order to assess the suitability of the contract offered for his whole life cycle and also to comply with the obligations arising from the AML legislation.

c) Direct and indirect marketing²

The processing of Your Personal Data, to develop activities for the promotion and sale of products and services of the Company, of a company of the Group Intesa Sanpaolo or of third parties (including the conduction of market research, commercial information activities and direct offers) by letters, telephone, Internet, SMS, MMS and other communication systems; Is optional and Your consent is required.

d) Legitimate interest of the Holder

The processing of Your Personal Data is necessary to pursue a legitimate interest of the Company, that is:

- to develop the activity of fraud prevention and protection of its rights;
- to manage the insurance risk after the signing of the insurance contract (for example, the management of the relationships with co-insurers and/or reinsurers);
- to contact you (through ordinary mail, e-mail, telephone, Internet, SMS, MMS and other communication systems) to submit certain questions in order to verify the suitability of the products

² Such purpose of the processing is referred only to the Personal Data relating to the insurance contracting party, the person who requests the quotation and the proposer. It does not refer to the insured person's personal Data (if it is a person other than the insurance contracting party), of the beneficiary or possible representatives, whose specific consent shall not be required.

you have purchased and/or the accuracy and quality of the activities and services provided (so called *customer satisfaction*), with the ultimate aim of improving the quality standards of the services provided to you and, more generally, all clients. In this area we want to make it clear that the answer to all questions is always optional and the refusal to reply shall not carry any consequences:

- to pursue possible and ulterior legitimate interests. In this latter case the Company shall be entitled to process Your Personal Data only after having informed you and having verified that pursuing its legitimate interests or those of third parties shall not compromise Your rights and fundamental freedoms; and Your consent is not required.

SECTION 4 - CATEGORIES OF RECIPIENTS TO WHOM YOUR PERSONAL DATA MAY BE COMMUNICATED

In order to pursue the previous goals it might be necessary for the Company to communicate Your Personal Data to the following categories of recipients:

1) **Companies of the Group Intesa Sanpaolo**, including those which provide services to the Company (for example: IT services, auditing services and portfolio management services)³.

2) **Third parties**, (companies, independent professionals, etc.) operating both inside and outside the European Union, for example:

- individuals who carry out insurance mediation activities⁴ such as insurance brokers, agents, sub-agents, insurance and reinsurance mediators, and other channels of distribution/management of insurance contracts (banks, leasing companies, etc.);
- individuals who provide insurance services as insurers, co-insurers, reinsurers;
- individuals who provide business or financial services;
- outsourcing companies which perform, among others, loading and recording activities of clients' data and relevant contractual documentation;
- services companies for the reception of the insurance premium, services companies responsible for the management, the settlement and payment of claims including the central operational assistance unit, IT and telematics services companies (for example the services for the management of the Company's information system, including the e-mail); postal services companies (for transmission, mailing, transport and distributions of the clients' communications), review and certification companies; companies of commercial information for financial risks; service companies for fraud control; credit recovery companies;
- services companies for the purchase, recording and processing of data from documents and supports provided and prepared by the clients themselves;
- companies or professional, legal, medical studies and fiduciary experts of the Company that perform consulting and assistance services on behalf of the latter;

³ In this regard it is pointed that, without the need of the interested party's consent, personal data relating to the notifications provided by the AML legislation between financial intermediaries belonging to the same group (Article 39 of the Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, called IV AML Directive), may be communicated (and processed solely for AML purposes).

⁴ In this regard it is pointed that, without the need of the interested party's consent personal data relating to the notifications provided by the AML legislation between obligated subjects (Insurance Company and Insurance Broker) in the cases relating to the same client and the same operation which involve the relevant obligated subjects, provided that they are subjects that must comply with the obligations provided by the current European directives relating to AML, that they belong to the same professional category and that they must comply with the obligations relating to professional secrecy and personal data protection (Article 39 of the Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, called IV AML Directive), may be communicated (and processed solely for AML purposes).

- individuals who perform activities filing documents relating to the relationships with the clients in both paper and electronic form and individuals who perform activities of assistance to clients (*help desk, call center, etc.*) and/or manage communications with the clients;
- consortium bodies specific of the insurance sector which operate on a basis of mutual exchange with all the insurance companies that are part of the consortium;
- companies in charge of surveys on the quality of the services, market studies, information and commercial promotion of the products and/or services.

3) **Authorities** (for example, judiciary, administrative, etc.) and other Irish or Spanish public parties, such as:

Central Bank of Ireland, Dirección General de Seguros y Fondos de Pensiones, Garda Síochána, Irish Revenue Commissioners, Servicio Ejecutivo de la Comisión de Prevención del Blanqueo de Capitales, Data Protection Commission, Spanish Data Protection Agency (Agencia Española de Protección de Datos), Ministries; Judiciary; Forces of Order, mediation Bodies.

The Companies of the Group Intesa Sanpaolo and third parties to which Your Personal Data may be communicated act as: 1) Processing holders, that is, individuals who determine the purposes and means of the Personal Data processing; 2) Data Protection Officers, that is, individuals who deal with the Personal Data on behalf of the Holder or, possibly 3) Processing co-holders who determine jointly with the Company its purposes and means.

The updated list of the individuals identified as Holders, Officers or, where applicable, Co-Holders may be found at www.intesasanpaololife.ie or may be requested to the Company at the following e-mail address: dpo@intesasanpaololife.ie.

Should the processing be jointly held, the Company shall made available for the interested party (for example, through its website) the basic content of the agreement with the co-holder as provided by article 26, paragraph 1 of the Regulation.

SECTION 5 - TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY OR AN INTERNATIONAL ORGANIZATION OUTSIDE THE EUROPEAN UNION.

Without prejudice to specific legal provisions⁵, Your Personal Data are processed by the Company within the European Union territory and shall not be disclosed.

If necessary for technical or operational reasons, the Company reserves the right to transfer Your Personal Data to countries outside the European Union, for which there are “suitability” decisions from the European Commission, that is, based on suitable guarantees or specific derogations provided by the Regulation.

⁵ According to the intergovernmental agreement between the United States and Ireland, whose aim is the application of the US normative known as FATCA (Foreign Account Tax Compliance Act) the Company may be obliged to provide its Personal Data, as well as more general information to the Irish Revenue Commissioner, which may in turn communicate the information received to the relevant USA authority. Intesa Sanpaolo Life Dac, as an insurance company of Irish law, shall have to communicate certain information pursuant to the Irish rules for the execution of international agreements relating to the exchange of financial information for tax purposes according to the CRS (Common Reporting Standard) and DAC2 (Directive 2014/107/UE) rules, which provide for an automatic exchange of financial information between financial Administrations in order to prevent tax evasion by individuals with tax residence in (or also in) States other than Ireland.

SECTION 6 – MODALITY OF PROCESSING AND TIME LIMITS FOR THE STORAGE OF PERSONAL DATA

The processing of Your Personal Data is carried out using manual, computer and telematic tools in order to guarantee the security and confidentiality of the data.

Your Personal Data are stored for a time period no longer than necessary to achieve the goals for which they are processed, regardless of the storage periods provided by law or other applicable provisions (for example, codes of conduct).

In particular, Your Personal Data shall be stored, as a rule, for a time period of 10 (ten) years after the contractual relationship. In the case of a quotation /estimate or the signing of a proposal, that after the quotation you have requested, or after your contractual proposal, the final insurance contract isn't entered into, as a rule we store this data for a time period of 12 months. In any case, Personal Data may be processed for a longer period when an act that interrupts or suspends the limitation period and justifies the extension of the data storage, or in case of one of the situations regulated by specific legal provisions (including possible codes of conduct) which prescribe the storage of data for an additional period.

After the legal deadlines, the personal data will be deleted adopting the adequate security measures that guarantee the total destruction of the same.

SECTION 7 – RIGHTS OF THE INTERESTED PARTY

As an interested party, you shall be able to exercise, at any time before the Holder of the rights provided by the Regulation, listed below, by sending a written request to the e-mail address dpo@intesasanpaololife.ie or by mail to the address Intesa Sanpaolo Life dac, 1st Floor, International House, 3 Harbourmaster Place, IFSC - Dublin D01 K8F1, Ireland.

With these same modalities You shall be able to revoke at any moment the consent given to the processing of your personal data for a specific purpose stated in this report. The possible communications and the actions taken by the Company about the exercise of the rights listed below shall be free of charge. However, should Your requests be manifestly groundless or excessive, in particular due to its repetitive nature, the Company shall be entitled to charge you an amount of money, considering the administrative costs borne, or refuse to comply with Your requests.

The Company shall respond to the interested party's request relating to the rights mentioned in Section 1 as soon as possible after receiving the request, and any event within one month from its reception. This time limit may be extended by two months, if necessary, depending on the complexity and number of requests.

1. Right to access

You shall be able to obtain confirmation from the Company that Your Personal Data are processed, or not, and if they are, you shall be granted access to the Personal Data and the information provided by article 15 of the Regulation, for example: the purpose of the processing and the categories of the Personal Data processed.

In case the Personal Data are transferred to a third country or an international organisation, you have the right to be informed of the existence of suitable guarantees relating the transfer.

Should you request it, the Company may provide you with a copy of the Personal Data concerning you that are being processed. With regard to possible ulterior copies, the Company shall be entitled to charge you a reasonable money amount based on administrative costs. If the relevant request is made through electronic means, and except as otherwise provided, the information shall be delivered to you by the Company in a commonly used electronic format.

2. Right to rectify

You shall be able to obtain from the Company the right to rectify Your Personal Data that are not accurate, as well as, considering the purposes of the processing, the data integration when they are not complete, by providing a supplementary statement.

3. Right to cancel

You shall be able to obtain from the Holder the cancellation of Your Personal Data, due to one of the reasons stipulated by article 17 of the Regulation, for example in case the Personal Data are no longer necessary with regard to the purpose for which they were compiled or processed or in case the consent in which the processing of Your Personal Data is based on has been revoked by you and there is no other legal ground for the processing. We inform you that the Company shall not be able to cancel Your Personal Data: in case their processing is necessary, for example, in order to comply with legal obligations, for reasons of public interests, for the verification, exercise or defence of a right in court.

4. Right to limit the processing

You shall be able to limit the processing of Your Personal Data when one of the conditions under article 18 of the Regulation is fulfilled, for example: if You question the accuracy of Your Personal Data that are being processed, or if Your Personal Data were necessary for the verification, exercise or defence of a right in court, even if they Company does not need them any more for the purposes of the processing.

5. Right of portability of the data

Should the processing of Your Personal Data be based on the consent or should it be necessary in order to execute a contract or pre-contractual measures, and the processing has been carried out using automatic means, pursuant article 20 of the Regulation, You shall be able to:

- request the reception of the Personal Data provided by You in a structured format, commonly used and legible via an automatic device (for example: computer and/or tablet);
- transfer Your Personal Data received to another holder of the processing without obstacles from the Company.

Additionally, you shall be able to request that Your Personal Data are transferred directly from the Company to another holder of the processing indicated by You, inasmuch it is technically feasible for the Company to do so. In this latter case, You shall provide us with all the exact contact details of the new holder of the processing to whom you intend to transfer Your Personal Data, providing us with a specific written authorisation.

6. Right to object

You shall be able to object to the processing of Your Personal Data at any time if they processing is carried out to perform an activity of public interest or to pursue a legitimate interest of the Holder (including the profiling activity).

Should You decide to exercise the right to object described above, the Company shall refrain from processing subsequently Your Personal Data, unless there are no legitimate reasons to carry out the processing (reasons prevailing over the interests, rights and freedoms of the interested party), or should the processing be necessary for the verification, exercise or defences of a right in court.

By contrast, if Your Personal Data are processed with marketing purposes, You shall be entitled to object to such processing at any time, including profiling if it were related to marketing.

7. Automated decision-making process relating to natural persons, including profiling

Article 22 of the Regulation stipulates the interested party's right not to be subject to a decision based only on automated data processing of Your Personal Data, including profiling, that has a legal effect referred to you or that significantly affects You, unless such decision:

- a) is necessary to conclude or execute a contract between You and the Company
- b) is authorized by Irish or European law;
- c) is based on Your explicit consent.

The Company carries out automated decision-making processes in order to acquire insurance products and the subsequent conclusion and execution of those products⁶. The Company shall take appropriate action to protect Your rights, Your freedoms and Your legitimate interests, and You shall be able to exercise the right to have human intervention from the Company, to express Your opinion or to challenge the decision.

8. Right to bring a complain before the competent Supervisory Authority for the protection of personal data

Without prejudice to Your right to turn to another administrative or jurisdictional office, in case you consider the processing of Your Personal Data by the Holder has infringed the Regulation and/or the applicable legislation, you shall be entitled to bring a complaint before the competent Supervisory Authority for the Protection of personal data pursuant article 77 of the Regulation⁷.

SECTION 8 – PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

With regard to the processing of special categories of personal data (revealing racial or ethnic origin, political views, philosophical or religious beliefs, trade union membership, as well as the processing of human genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health, sex life or sexual orientation), necessary for the conclusion and signing of the insurance contract, as well as the subsequent phase of contractual management and execution, explicit consent is required, except for the specific cases provided by the Regulation which allow the processing of these Personal Data even without consent.

⁶ For example in order to verify the limiting clauses of the contract (such as the age of the insured person).

⁷ Article 77, paragraph 1 of the Regulation states that "... if the interested party considers that the processing relating to him/her infringes this regulation, he/she shall be entitled to make a claim against the control Authority of the member State where he/she habitually lives, works or the place where the alleged infringement took place".