Information Notice on the Processing of Personal Data

The company under the corporate name "Seatack Asfalistikoi Praktores Single-Member P.C." ("Seatack Asfalistikoi Praktores SINGLE MEMBER P.C..") and the distinctive title "Seatack Agency", hereinafter referred to as "Seatack", has been established, operates and is lawfully represented in accordance with the provisions of Greek law, has its registered office in Agia Paraskevi, at 5 Skoufa Street, Postal Code 15343, General Commercial Registry (G.E.MI.) No. 166767803000, Tax Identification No. (VAT) 801944674 / Tax Office of Cholargos, is duly registered in the special register of the Athens Professional Chamber as an insurance agent under registration No. 8749 and as an insurance agents' coordinator under registration No. 1444, and is supervised by the Bank of Greece.

In the course of its activities, Seatack collects, keeps and processes Personal Data and Special Categories of Personal Data, both of its clients and of third parties, for the purpose of supporting, promoting and performing the contractual relationship with its clients and partners, protecting transactions and informing clients about the services provided. In particular, Seatack may collect and process data of third parties who are not its clients, such as, in particular, injured parties in losses covered by insurance policies of its clients (e.g. liability insurance), as well as witnesses and other persons involved. Such data may originate from its clients, from the persons themselves, from insurance undertakings, loss adjusters or competent authorities, and are used exclusively for the notification, handling and settlement of the claim.

Seatack processes your personal data at all times with respect for the fundamental rights of natural persons, in accordance with the applicable European and Greek legislation (including the General Data Protection Regulation (EU) 2016/679, Greek Law 4624/2019, Law 3471/2006 on the protection of personal data in electronic communications, Law 4583/2018 on insurance distribution and any other relevant applicable legal text).

The protection of our clients' personal data is of paramount importance. For this reason, we take appropriate measures to protect the personal data we process and to ensure that the processing of personal data is always carried out in accordance with the obligations laid down by the legal framework, both by Seatack itself and by third parties processing personal data on its behalf.

Data Controller

The Controller of your personal data is "Seatack Asfalistikoi Praktores Single-Member P.C.", 5 Skoufa Street, Agia Paraskevi, Postal Code 15343, tel. +30 210 6004086, e-mail dpo@seatack.gr.

Data Protection Officer (DPO)

For any matter concerning the processing of your personal data and the exercise of your rights, you may contact Seatack's Data Protection Officer (DPO): e-mail: dpo@seatack.gr, tel.: +30 210 6004086, postal address: 5 Skoufa Street, Agia Paraskevi, Postal Code 15343, Greece.

Security of Personal Data

The security of your personal data is extremely important to us and, for this reason, we take and implement all appropriate organisational and technical measures to ensure that the data we collect are adequately protected and processed in accordance with the requirements of the applicable legislation. In any case, the way the internet operates and the fact that it is open to anyone do not allow guarantees to be given that unauthorised third parties will never be able to breach the technical and organisational measures applied, gaining access to and possibly using personal data for unauthorised and/or unlawful purposes.

What personal data we collect and process

In the context of our cooperation and in the performance of our work as an insurance intermediary, you need to provide us with Personal Data / Special Categories of Personal Data, relating to you, your relatives and/or third parties, as set out in the Client Needs Form and in the relevant fields of the Insurance Applications (in paper or electronic form), in any subsequent Application (e.g. application for amendment, claim, surrender etc.), as well as in forms, electronic forms, portals and applications, which relate to your insurance, our cooperation, your claim or informing you about our services.

The data we collect include, indicatively and not exhaustively, identification and contact information, such as first name and surname, home address, date of birth, e-mail, telephone, consumer goods preferences and Special Categories of Personal Data, such as health data – family medical history, as well as other information required under insurance legislation. If the insured risk occurs, we will ask you for further information regarding the event, e.g. accident, hospitalisation, etc. If you provide us with information for the insurance of another natural person, you must inform that person of the content of this Privacy Policy and obtain his/her explicit consent to your disclosing such information to us, before disclosing it. Finally, when you browse Seatack's website, data such as your IP address and

information from cookies may be collected, which may constitute personal data. Cookies that are not strictly necessary for the operation of the website are used only with your consent, as described in the website's Cookie Policy.

In general, we collect and process personal data of our clients, insured persons and/or prospective insured persons, beneficiaries, policyholders or third parties, which we collect and/or transfer to insurance undertakings and/or third parties in the performance of our work as an insurance intermediary. We process the personal data you provide to us only when we have a lawful ground to do so.

Purposes of Processing

We process your personal data for the purposes described below:

- We collect and process personal data in order to research the market and propose the best possible insurance solution. For this reason, your data are disclosed to the insurance undertakings, reinsurance undertakings or insurance intermediaries we cooperate with and are processed by them, as they are objectively essential for: a) the assessment of the insurance risk (underwriting), b) the calculation of the premium, c) the determination of the general and special terms of the insurance contract, and d) the fulfilment of the purpose and the operation of the insurance contract.
- We collect and process personal data in order to identify your insurance demands and needs and to document the advice we provide to you, as well as, for insurance-based investment products, to assess the suitability or appropriateness of the product, as required by the applicable legislation.
- We collect and process personal data for the conclusion, issuance and administration of the insurance policy.
- We collect and process personal data for the assessment, verification and settlement of the insurance indemnity upon occurrence of the insured risk, or for the payment of the sum provided for in the terms of the contract (sum insured).
- We collect and process your personal data and/or special categories of personal data in the context of the insurance contract and, in particular, of the claim you submit.
- We collect and process personal data for processing payments from and to you.
- We collect and process personal data in order to comply with the obligations imposed on us by law (e.g. tax legislation, supervision by the Bank of Greece, complaints handling and, for life insurance and insurance-based investment products, the legislation on the prevention of money laundering).

- We collect and process personal data for the establishment, exercise or defence of legal claims and for the prevention of insurance fraud.
- We collect and process personal data in order to serve you as clients / users of our website, as well as for complaints handling. We process personal data that are objectively essential and necessary to serve you, at your request.
- We collect and process personal data i) to inform you (by electronic or postal mail, by telephone or SMS) about matters relating to your insurance policy (e.g. expiries, renewals, payments) and ii) to ask you about your level of satisfaction with Seatack's services.
- We collect and process personal data for the security of our information systems and for evidencing electronic communications and transactions, on the basis of our legitimate interest and our obligation to take appropriate security measures (Article 32 GDPR).
- In addition, we process personal data for the following purposes, for which your consent is required: for advertising and promotional activities that we may carry out in the future, as well as for sending offers, savings tips and useful newsletters. You may refuse or withdraw your consent at any time, free of charge, including via the unsubscribe link in each message.

Legal Basis for Processing

The processing of Personal Data / Special Categories of Personal Data and of other data and information collected by Seatack Agency in the course of its operation and for the above purposes is based on:

- the performance of the contract between us (insurance policy) and the steps required at the pre-contractual stage (e.g. completion of an application, submission of a quotation, etc.)
- your consent (where applicable, e.g. for the processing of special categories of personal data, for promotional activities, etc.),
- compliance with legal obligations imposed by the applicable legislative and regulatory framework (e.g. private insurance legislation, handling of complaints, provision of information to public and supervisory bodies, etc.) and
- the pursuit of its legitimate interests (e.g. the establishment and exercise of its legal rights, the prevention of insurance fraud, the assessment of client satisfaction, the management of its business operations, the operation of its information systems, internal audit procedures, etc.).

Seatack does not take decisions based solely on automated processing, including profiling, which produce legal effects concerning you or similarly significantly affect you. The insurance undertakings to

which your application is forwarded may use automated means (e.g. for risk assessment and premium calculation), about which you are informed through their own Privacy Policy.

Sources of the data

The data are collected mainly directly from you. We may also receive them from the policyholder (where you are the insured person, co-insured person, dependant, driver or beneficiary), from third parties authorised by you, from insurance undertakings and other insurance intermediaries, from loss assessors and loss adjusters, from doctors, clinics and diagnostic centres (where required, with your explicit consent), from the Information Technology Department of the Hellenic Association of Insurance Companies (Y.S.A.E.), as well as from publicly accessible sources and registers (e.g. the General Commercial Registry (G.E.MI.), vehicle and vessel registers). Where your data are not collected from you, we provide you with this notice within a reasonable period and at the latest within one month (Article 14 GDPR), unless you already have it.

Who do we share your data with?

As insurance intermediaries, we reserve the right to transfer Personal Data and/or Special Categories of Personal Data to the cooperating insurance undertaking providing the insurance product – service, for the purpose of obtaining an insurance quotation, processing the insurance application, and operating and performing the insurance contract, etc. Any further retention, processing and/or transfer of Personal Data and/or Special Categories of Personal Data to third parties within or outside the EU by the cooperating insurance undertakings providing the insurance product is governed by the respective Privacy Policy of each cooperating insurance undertaking and by the provisions and terms of (re)insurance of the relevant insurance policies.

In the course of the operation of your insurance contract, Personal Data and/or Special Categories of Personal Data may be transferred to various hospitals, doctors, reinsurers and the Statistical Service of Insurance Companies.

Furthermore, your Personal Data and/or Special Categories of Personal Data may be made accessible, in the course of our business operations, to our employees (underwriting department, claims department, etc.) and to our external partners, legal entities and natural persons – service providers, who meet the requirements laid down by law and have cooperation and confidentiality agreements with us, such as, for example, cooperating insurance intermediaries, providers of online insurance systems, e-mail service providers, SMS service providers, call centre service providers, e-banking and online

transaction service providers, courier service providers, third-party companies and professionals, such as banks and financial institutions, hospitals and clinics, diagnostic centres and laboratories, doctors and other healthcare professionals, lawyers, bailiffs, loss assessors, accident investigators and certified auditors, as well as IT, data hosting and cloud service providers, roadside assistance and claims management companies, insurance undertakings and intermediaries abroad (e.g. the Lloyd's market) where the risk is placed there, and partners in our network (sub-agents).

In addition, it may be necessary to transfer your Personal Data and/or Special Categories of Personal Data to the Statistical Service (Y.S.A.E. records) of the Hellenic Association of Insurance Companies and to the Electronic Direct Settlement System (Friendly Claims Settlement System), to Public or Judicial Authorities (such as courts, public prosecutors, the police, independent regulatory and tax authorities), where required for compliance with the legal obligations of Seatack or for the establishment, exercise or defence of legal claims, and to the Bank of Greece as the supervisory authority of insurance intermediaries.

Seatack has taken the necessary measures to ensure that only the strictly necessary data are transferred each time and that the lawfulness of the processing is ensured.

Seatack will not disclose your personal data in any way to any third party that is not related to your insurance policy and the provision of the covers and services provided for therein, unless required by law or by a lawful request or order of a public authority.

Seatack will not transfer any of your personal data to third parties for use in commercial promotional activities without your prior explicit consent.

In the event of a transfer of your personal data outside the European Economic Area (EEA), Seatack ensures that such transfer will take place only after the application of at least one of the safeguards provided for in the applicable legal framework and
of the supplementary measures appropriate to ensure that the personal data transferred enjoy, in the third country, a level of protection essentially equivalent to that guaranteed within the European Union.

Processing of children's data

For minors under 18 years of age participating in the insurance as insured persons and/or beneficiaries, the processing is lawful only if and to the extent that it is authorised, or consent (where required) is given, by the person holding parental responsibility for the minor. When the minor reaches the age of 18, consent (where required) for the processing of his/her personal data by Seatack is given by the person concerned, now an adult.

Mandatory or optional provision of data

The provision of the data required to identify your insurance needs, to submit an insurance application and to administer the contract and claims is necessary for the conclusion and performance of the insurance contract or is required by law (Law 4583/2018). If you do not provide them, it will not be possible to provide advice, submit an insurance application or serve you. The provision of data for the purposes of promoting products and services is optional, and your refusal does not affect your insurance.

How long we keep your Personal Data

Seatack will keep (in paper and/or electronic form) and process your data for as long as your contractual relationship with it lasts. If, for any reason, this relationship ends, Seatack will keep your data for as long as required under the applicable legislation or until the limitation period for any relevant claims has expired, with a maximum period of ten (10) years. If the insurance contract is not concluded, Seatack may keep the data you provided at the pre-contractual stage for a period of up to two (2) years from their submission.

The above personal data may also be kept for such period as is specified by other tax or specific legislative provisions.

For the purposes of promoting products and services, your personal data are kept until you withdraw your consent or, where there is no active cooperation between us, for up to two (2) years from our last communication at the latest. You may withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. To withdraw your consent, please contact the Data Protection Officer (DPO) at the following contact details: e-mail: dpo@seatack.gr, telephone: +30 210 6004086. You may also stop receiving promotional messages at any time via the unsubscribe link included in each message.

The above apply provided that no legal dispute is pending beyond the above retention periods, in which case the data are kept until the dispute is finally resolved by an irrevocable court decision.

Your rights in relation to your personal data

In accordance with the General Data Protection Regulation (EU) 2016/679, you have the following rights:

- Right of access: to know whether we process your data and, if so, which data, for what purpose, for how long and with whom we share them, and to receive a copy of them.
- Right to rectification: to request the correction of inaccurate or the completion of incomplete data.
- Right to erasure: to request the erasure of your data, in particular where they are no longer necessary for the purposes for which they were collected, where you withdraw your consent or where the processing is unlawful. This right does not apply to the extent that retention of the data is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims.
- Right to restriction of processing: where you contest the accuracy of the data, where the processing is unlawful but you do not wish the data to be erased, where you need them for legal claims, or where you have exercised your right to object and its assessment is pending.
- Right to data portability: to receive the data you have provided to us in a structured, commonly used and machine-readable format, or to request their transfer to another controller, where the processing is based on your consent or on a contract and is carried out by automated means.
- Right to withdraw consent: to withdraw your consent at any time, without affecting the lawfulness of processing carried out before the withdrawal.
- Right to object: You have the right to object at any time, on grounds relating to your particular situation, to processing based on our legitimate interest. In that case we will stop the processing, unless there are compelling legitimate grounds that override your interests or the processing is necessary for legal claims. You may also object at any time, without giving reasons and free of charge, to processing for direct marketing purposes, in which case your data will no longer be used for that purpose. However, your data may continue to be processed by Seatack, since, on the one hand, the insurance contract cannot operate without the processing of personal data and, on the other hand, there may be compelling legitimate grounds for such processing, or it may be necessary for the establishment, exercise or defence of legal claims or for compliance with its legal obligations.

Seatack informs you that, in accordance with the law and decisions of the Hellenic Data Protection Authority, the withdrawal of your consent may, where applicable, result in the immediate termination of our contractual relationship and in claims you have submitted not being satisfied, since Seatack will no longer be entitled to process your personal data.

To exercise any of the above rights, you may submit a request to dpo@seatack.gr or contact our company by post, "Seatack Asfalistikoi Praktores Single-Member P.C.", at the postal address: 5 Skoufa Street, Agia Paraskevi, Postal Code 15343, Greece, telephone: +30 210 6004086.

Please note that, where there are reasonable doubts as to the identity of the data subject submitting the request, Seatack may request additional information to confirm his/her identity.

The exercise of your rights is free of charge.

Seatack will respond to your request without undue delay and in any event within one (1) month of its receipt, informing you either that it has been satisfied or of the reasons preventing its satisfaction. This period may be extended by two (2) further months where necessary, taking into account the complexity or number of requests. In that case, we will inform you of the extension and the reasons for it within the first month.

Right to lodge a complaint with the Hellenic Data Protection Authority

You always have the right to contact the Hellenic Data Protection Authority (1-3 Kifisias Avenue, Postal Code 115 23, Athens, Greece, switchboard +30 210 6475600 / fax +30 210 6475628, e-mail contact@dpa.gr), which may also receive relevant complaints. Visit https://www.dpa.gr/el/polites/katagelia_stin_arxi for detailed information.

Finally, you always have the right to seek a judicial remedy.

This Privacy Policy entered into force on 24th October 2022. It may be amended from time to time and any changes will be communicated to you by means of a notice on our website. Visitors and users should check this page regularly in order to be informed of the policy at all times.

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