



Assicurazioni Generali S.p.A.
piazza Duca degli Abruzzi, 2
34132 Trieste / P.O. Box 538
P +39 040 671111
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generali.com

PRIVACY NOTICE FOR DATA SUBJECTS WHOSE DATA ARE PROCESSED BY ASSICURAZIONI GENERALI S.p.A. FOR REINSURANCE PURPOSES

Your privacy is important to us. That is why we are committed to protecting your personal information and treating it with the utmost care and attention. In this privacy notice, we will transparently explain how we collect, use, share and protect your personal information.

1. DATA CONTROLLER DETAILS

Assicurazioni Generali S.p.A (the Company), Piazza Duca Degli Abruzzi 2, 34132 Trieste, processes your personal data as data controller.
If you wish to receive more information, you can use the following postal address:
- Assicurazioni Generali S.p.A., Piazza Duca degli Abruzzi no. 2, 34132 Trieste / P.O. Box 538.
For any questions or if you wish to exercise a right in respect of the processing of your personal data, you can contact our Data Protection Officer:
by email at: dpoag@generali.com;
by traditional mail at: Assicurazioni Generali, Piazza Tre Torri n. 1, 20145 Milan to the attention of the data protection officer.

2. WHY DO WE PROCESS YOUR PERSONAL DATA AND ON WHICH LEGAL GROUND

The Company, in its role of reinsurer, processes your personal data for the following purposes and on the basis of the following assumptions:

Legal ground	Purpose
Legitimate interest	1. Conclude, perform and manage reinsurance contracts including ancillary activities such as claims handling process
	2. Perform reporting, statistics and data analytics activities to assess the reinsurance contract performance and keep record of the same for future improvements
	3. Company strategic development, corporate transactions, mergers and acquisitions, restructuring, extraordinary operations
	4. Managing IT and IT security activities (such as asset management, continuity)
	5. Claim and defend the rights of the Company, its officers, representatives and shareholders in a potential dispute
Legal obligation	6. Fulfilment, of regulatory and legal obligations (national and supranational, such as, international sanctions screening, financial reporting and tax obligation).



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Should you oppose the processing based on legitimate interest assumption, as explained in paragraph 8 below, your personal data may not be used for the above-mentioned purposes, unless the Company proves the existence of compelling legitimate reasons to proceed with the processing that prevail over your interests, rights and freedoms.

The processing based on the legal obligation assumption is mandatory.

3. HOW DO WE COLLECT YOUR PERSONAL DATA

The Company does not collect your personal data directly from you. We receive it through external sources such as insurers, reinsurers, brokers and consultants.

When your employer subscribes to an insurance policy with an insurer, you may be covered under such policy as an insured person or as a beneficiary. In such case we may obtain from the insurer your personal data. The same goes for the situation where a claim is submitted.

4. WHICH PERSONAL DATA WE USE

We process your personal data strictly necessary to achieve the purposes above. We mainly process:

- direct identification data (such as name and surname);
- indirect identification data (such as policy number, insured/claimant code);
- health personal data (if any), processed in compliance with personal data protection applicable legislation;
- any other personal data observed, inferred or generated during the process or provided by your Insurer, or third party (e.g. Broker, etc.) involved (if any).

5. HOW DO WE PROCESS YOUR PERSONAL DATA

The Company processes your personal data in both manual and automated form, adopting the technical and organizational measures necessary to ensure an adequate level of security of your data.

We use statistical and artificial intelligence (AI) systems and analytical solutions.

The use of AI allows us to analyze your personal data faster and more in depth, improving our ability to respond to specific needs optimizing internal processes and pursuing the above-mentioned purposes. As said, we process your personal data only when strictly necessary, encouraging the use of anonymized or aggregated datasets, when possible.

In our activities, we never use fully automated processes, including profiling, human intervention is always involved.

6. WITH WHOM WE SHARE YOUR PERSONAL DATA

Our staff processes your personal data with modalities and procedures, also in electronic form, Your personal data can be shared with other third-party Reinsurers (optional) and only with third party which have been assigned with the task to perform some activities concerning the management of the reinsurance contract (such as, for example, lawyers, fiduciary doctors, technical consultants, experts, etc). Depending on the activity performed, such third parties may act as Data Processors, Joint Controllers or autonomous Data Controller. Both our staff and third parties which process your personal data for the purposes above indicated – exception for autonomous Data Controllers and Joint Controllers– receive proper instructions about the correct modalities of the processing. Furthermore, insofar as applicable, your personal data may be shared with other companies belonging to the Generali group.

Depending on the activity carried out, the parties may act as data processors, joint controllers or autonomous data controllers.

7. TO WHOM AND WHERE WE TRANSFER YOUR PERSONAL DATA

Company established in Trieste in 1831 - Share Capital € 1,602,736,602.13. fully paid-up
Fiscal code, Venezia Giulia Companies' Register no. 00079760328
Company entered in the Register of Italian Insurance and Reinsurance Companies under no. 1.00003 - Parent Company of Generali Group, entered in the Register of Insurance Groups under no. 026
Pec: assicurazionigenerali@pec.generaligroup.com



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As a rule, we do not transfer your personal data to countries outside the European Economic Area (EEA). In exceptional cases, limited to the purposes set out above, we may transfer your personal data to third parties or public bodies who so request, including to countries outside the EEA. In all cases, transfers will be made in accordance with applicable law and international agreements in force and based on appropriate and adequate safeguards (such as, for example, to countries deemed adequate by the EU Commission or through the adoption of standard contractual clauses approved by the EU Commission).

8. WHAT RIGHTS CAN YOU EXERCISE AS A DATA SUBJECT

You can exercise the right of access, rectification, updating, integration, cancellation, limitation to processing, portability in respect to your personal data.

In case you provided your consent to the processing of personal data, you may withdraw it at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

If your personal data are transferred outside the European Economic Area, you have the right to obtain copy of such data as well as indication of the Country/Countries where the data have been made available.

Insofar as applicable, you have the right to object to the processing of your personal data and request the stop of the processing operations when they are based on the legitimate interest.

In case you consider that the processing of your personal data infringes the applicable privacy laws, you have the right to lodge a complaint with a supervisory authority. You can contact the Italian Personal Data Protection Authority – Garante per la Protezione dei Dati Personali with the modalities indicated on the Authority's website (www.garanteprivacy.it).

9. HOW LONG DO WE STORE YOUR PERSONAL DATA

Your personal data are retained for the period necessary to fulfil the purposes for which they were collected. In particular, personal data are retained:

- Purpose 1: For the whole duration of the reinsurance contract and for 10 years after its termination;
- Purpose: 2: for the period necessary to pursue the purposes for which they were collected, but anyway not exceeding 24 months from the moment of the collection or, in case of disputes, for the statute of limitations set forth under the applicable laws, without prejudice to any longer storage periods provided for by specific laws;
- Purposes 3, 4 and 5: for 10 years equal to the statute of limitations set forth under the applicable laws, without prejudice to any longer storage periods provided for by specific laws;
- purpose 6: for the period necessary to fulfil applicable legal obligations, without prejudice to any longer storage periods provided for by specific laws.

Changes and updates to the privacy notice

Also considering possible amendments to the applicable privacy laws, the Company may integrate and/or update, wholly or partially, this privacy notice.

Any changes, integrations or updates will be communicated through publication on the Company's website www.generali.com