

Kindlustusest Kindlustusmaakler OÜ**PRINCIPLES FOR PROCESSING CUSTOMER DATA**

The principles for processing customer data in Kindlustusest Kindlustusmaakler OÜ (hereinafter Kindlustusest) are described in these principles for processing customer data (hereinafter the Principles).

These Principles apply when the customer uses, has used or has expressed a wish to use the services provided by Kindlustusest or that are otherwise related to the services, including the application of the principles on the customer relationship that occurred before the entry into force of these principles.

1. Definitions

1.1 Customer is any natural or legal person who has used, uses or has expressed a wish to use the services provided by Kindlustusest or is otherwise involved in the provision of services.

1.2 Customer data is any information (incl. customer details related to the provision of insurance services and information regarded as personal data) about the customer or its representatives and which is known to Kindlustusest.

1.3 Personal data is information that is directly or indirectly related to the customer as a natural person.

1.4 Processing is any processing involving customer data (including collection, storage, retention, modification, access, making inquiries, transfer , etc.).

2. General provisions

2.1 These principles describe the general principles of processing customer data by Kindlustusest. Further terms and conditions for the processing of customer data may also be described in the contracts, other service-related documents and the website of Kindlustusest www.kindlustusest.ee.

2.2 Kindlustusest ensures the confidentiality of customer data in accordance with applicable law and takes appropriate technical and organizational measures to protect customer data from unauthorized access, illegal processing or disclosure, accidental loss, alteration or destruction.

2.3 Kindlustusest can use authorized processors for processing customer data. In such cases, Kindlustusest shall ensure that the data processors process customer data according to the instructions of Kindlustusest, in accordance with the applicable law, and implement appropriate security measures.

2.4 The rules applicable to the cookies of Kindlustusest are available on the web site of Kindlustusest at www.kindlustusest.ee.

3. Categories of customer data Kindlustusest may collect customer data directly from the customer and from external sources such as public and private registers and other third parties. Categories of customer data that Kindlustusest primarily, but not exclusively collects and processes are as follows:

3.1 Personal identification data, such as name, personal identification code, date of birth, identity card (e.g., passport or ID card copy).

3.2 Contact information, e.g. address, telephone number, email address, communication language.

3.3 Data necessary for the provision of insurance services, such as beneficiaries, insured persons, family data, injured third parties, information about the insured property and insurance interest.

3.4 Information on the relations between the customer and legal entities, e.g. data provided by the customer or obtained from public registers or third parties for the purpose of conducting transactions on behalf of this legal entity.

3.5 Financial data: eg accounts, transactions, income, liabilities.

3.6 Customer`s financial experience e.g. data collected during the selection and provision of insurance services or other products bearing investment risk.

3.7 Data on the origin of the asset or revenue, such as information about the customers business partners and business.

3.8 Data on reliability and due diligence, e.g. data on payment behavior; damage caused to Kindlustusest or a third party and information enabling Kindlustusest to fulfill its due diligence measures in relation to the prevention of money laundering and terrorist financing, and to ensure compliance with international sanctions, including the purpose of the business relationship, and whether the customer is a person with state background.

3.9 Information obtained and/or generated during the performance of the obligation arising from the law, such as investigative bodies, data obtained and/or generated by the notaries, tax authorities, courts and bailiffs.

3.10 Communication data such as visual and/or audio recordings that are collected during a customer visit to the offices of Kindlustusest and other places where Kindlustusest offers its services, or if the customer communicates with Kindlustusest by phone or other information that is collected through email, messages and other communication mechanisms, such as social media, data linked to the customers visit to the website of Kindlustusest or communication via other channels of Kindlustusest.

3.11 Service-related information, eg execution or non-execution of contracts, concluded and terminated contracts, applications submitted, inquiries and complaints, insurance experience.

3.12 Information about habits, preferences and satisfaction, e.g., usage of services, used services, personal settings, polls, lifestyle, hobbies, customer satisfaction.

3.13 Information about participation in games and campaigns, such as points collected, games or campaigns won.

3.14 Family data, such as information about the customer family, heirs and other related persons.

3.15 Data of different category, e.g. customer's health.

4. Objectives and basis for processing customer data Kindlustusest processes customer data primarily to:

4.1 Manage customer relationships and provide access to services for concluding and performing a brokerage agreement with the customer, as well as for updating and keeping the customer data up to date.

4.2 Perform internal risk assessments in order to determine which services and products can be offered to the customer and to ensure compliance with applicable law related to risk assessments in the provision of insurance services.

4.3 Protect the interests of the customer and/or Kindlustusest and examine the quality of the services provided by Kindlustusest and in order to prove transactions or other business communication (through recorded interviews).

4.4 Provide additional services, conduct customer satisfaction surveys, market analyzes and make statistics.

4.5 Remain consistent with applicable law and international agreements, implementing the principles of „respecting customer due diligence“ and „know your customer (KYC)“.

4.6 Avoid misuse of and ensure proper provision of services.

4.7 Certify, execute, assign and protect legal requirements based on the implementation of the agreement or the implementation of the pre-contractual measures at the request of the customer or the fulfillment of a legal obligation or the legitimate interest in the performance of legal requirements for the performance of legal requirements.

5. Profile analysis, personalized offers and automated decision making

5.1 Profile analysis is the automatic processing of personal data used to assess certain personal characteristics of a customer, for example, to analyze or predict an individual's economic situation, personal preferences, interests, place of residence. Profile analysis is used for client counseling, marketing purposes and automated decision making, for example, for risk management, insurance risk assessment and transaction control in combating fraud, based on legitimate interest of the Insurance, or in the performance of a legal obligation, performance of the contract or with the customer's consent.

5.2 Kindlustusest may process customer data for improving the user experience of digital services, for example, the adaptation of service views to the device used and the creation of personal offers to the customer. Unless the customer has refused from direct marketing, Kindlustusest may process customer data for the purposes of offering services of Kindlustusest, including personal offers. Such marketing can be based on the services that the customer uses and on how the customer uses the services and how the customer navigates through the digital channels of Kindlustusest.

5.3 In making of personalized offers based on profile analysis and for marketing based on the legitimate interest of Kindlustusest, Kindlustusest ensures that private Customers can make their own choices by using a convenient system for managing privacy settings.

5.4 Kindlustusest may also collect statistical information about the customer, such as typical behavior and lifestyle, based on demographic household data. Statistical data for creating

segments/profiles can be collected from external sources and can be combined with internal data from Kindlustusest.

6. Recipients of customer data Customer data is shared with other recipients, for example:

6.1 Persons involved in the performance of a customer contract, such as IT service providers.

6.2 insurance service providers (insurers, Kindlustusests);

6.3 other third parties in connection with the performance of the rights and obligations of the Kindlustusest arising from the agreement concluded with the customer or legislation, e.g. Financial Supervision Authority, Data Protection Inspectorate, and other law enforcement agencies, bailiffs, tax authorities;

6.4 auditors, legal and financial advisers or other processors authorized by Kindlustusest;

6.5 third parties holding registers (for example, a car registry or other registers in which customer data is stored or mediated);

6.6 debt collectors in the assignment of claims, courts and bankruptcy or insolvency administrators;

6.7 other persons involved in the provision of insurance services, e.g. providers of archiving and postal services, providers of services offered to the customer, if the customer orders e-invoices for these services, health care institutions in the case of life insurance.

6.8 health care institutions in case of provision of life insurance services.

7. Geographical area of processing

7.1 Generally customer data is processed within the boundaries of the European Union/European Economic Area (EU/EEA), but in some cases they are transferred and processed in countries outside the EU/EEA.

7.2 Transmission and processing of customer data outside the EU/EEA may take place subject to the existence of a legal basis, such as the fulfillment of a legal obligation or the consent of the customer, and the implementation of appropriate safeguards. Examples of appropriate safeguards include: a valid contract containing standard terms of contract or approved code of conduct, certification, and other similar procedures developed by the EU that complies with the General Data Protection Regulation (GDPR); in a country outside the EU/EEA where the recipient is located has an adequate level of data protection, as decided by the European Commission; the receiver is certified under the Privacy Shield (applicable to US-based receivers).

7.3 In the event of a request, the Customer will receive more detailed information about the transfer of customer data to countries outside the EU/EEA.

8. Periods of data retention

8.1 Customer data are not processed longer than necessary. The period of data retention may be based on contracts concluded with the customer, on the basis of the legitimate interest of the Kindlustusest or applicable law (e.g. accounting laws, anti-money laundering regulations or limitation laws, other private law).

9. Rights of the customer as a private person The customer as a private person has the following rights in connection with the processing of personal data

9.1 request to correct his/her personal data if they are inadequate, incomplete or invalid;

9.2 raise objections to the processing of personal data when the use of personal data is based on legitimate interest, including a profile analysis for direct marketing purposes (e.g. receiving marketing offers or participating in surveys);

9.3 request the deletion of his/her personal data, for example, if the personal data is processed with his/her consent and if he/she has withdrawn his/her consent. The above right does not apply if the personal data requested to be deleted are processed also on other legal grounds, for example, under a contract or for the performance legal obligations;

9.4 limit the processing of personal data under the applicable law, for example, at the time when Kindlustusest assesses whether the customer has the right to request that the customer data is deleted;

9.5 receive information on whether Kindlustusest processes the customers data and if this is the case, have access to the abovementioned data;

9.6 receive his/her personal data which the customer has itself provided and which is processed on the basis of consent or for the performance of the contract, in writing or in a public electronic format, and, if technically possible, to transfer this information to another service provider (data transferability);

9.7 withdraw his/her consent to the processing of his/her personal data;

9.8 request that no decision is taken with regard to the customer which is based solely on automated decision-making, including a profile analysis, if this would affect the customer or have a significant effect on him/her.

This right does not apply if making decisions is necessary for the conclusion or performance of a contract with the customer, if the decision is made under the applicable law or if the customer has given his/her explicit consent.

9.9 submit complaints about the use of personal data to the Estonian Data Protection Supervision Authority (website: www.aki.ee) if it considers that the processing of its personal data violates his/her rights and interests under the applicable law.

10. Contact data

10.1 Customers may contact the Broker in connection with inquiries and cancellation of consents, and private customers may, in addition, require the performance of their rights in the processing of personal data and file complaints about the use of personal data.

10.2 The contact details of Kindlustusest are provided on the website of Kindlustusest at www.kindlustusest.ee.

11. Validity and modifications of the principles

11.1 Principles are available to the customers at the offices and website of Kindlustusest <https://www.kindlustusest.ee/conditions>

11.2 Kindlustusest is entitled to amend these principles unilaterally at any time in accordance with applicable law by notifying the customer of any changes in the offices of Kindlustusest, its website, by post, by email or by any other means (e.g. via the media) not later than one month before the amendments take effect.