### **PRIVACY POLICY: CASER**

Version 02 of 06 November 2023

The following is the **privacy policy** (hereinafter, "web privacy policy" or "policy") governing the website https://www.caserexpatinsurance.com/ (hereinafter, "website" or "the Website"), under the ownership of CAJA DE SEGUROS **REUNIDOS, Compañía de Seguros y Reaseguros, S.A.** (hereinafter, "Caser" or "we"), an entity with registered office at Avenida de Burgos 109, 28050 Madrid, and registered in the Mercantile Register of Madrid, volume 2245, Folio 179, Page M - 39662.

PLEASE TAKE A FEW MINUTES TO READ OUR PRIVACY POLICY, IT WON'T TAKE LONG. WE WANT TO EXPLAIN TO YOU IN A SIMPLE, CLEAR AND TRANSPARENT WAY HOW WE TREAT AND PROTECT YOUR PERSONAL INFORMATION AND YOUR RIGHTS. YOUR SECURITY AND THE SECURITY OF YOUR PERSONAL DATA IS FUNDAMENTAL TO CASER AND WE TAKE ITS ADEQUATE PROTECTION VERY SERIOUSLY.

#### **TO WHOM IS THIS POLICY ADDRESSED AND APPLIED?**

This policy is applicable to all users of the website, whether or not they are Caser customers (hereinafter, indistinctly, "the user" or "users") who are considered natural persons. By personal data, we mean any information about an identified or identifiable natural person. If you are already a **client** of Caser, because you have signed a contract with us, you should also refer to the information contained in said contract regarding the specific terms of privacy.

## IF YOU BROWSE OR USE OUR WEBSITE, WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

**Company name of the person responsible:** CAJA DE SEGUROS REUNIDOS, Compañía de Seguros y Reaseguros, S.A.

Registered offices: Avenida de Burgos 109, 28050 Madrid

**VAT NO:** A28013050

Contact telephone number(s): 915 95 50 00

#### **CASER DATA PROTECTION OFFICER (DPD)**

Caser has appointed a DATA PROTECTION DELEGATE (DPD), with whom users, if they so wish, may contact regarding all matters relating to the processing of their personal data and for the exercise of their rights under the provisions of the General Data Protection Regulation (GDPR). You can contact our DPD through the following contact details:

Postal address: Avda. de Burgos, 109 - 28050 - Madrid (Spain)

Contact e-mail: dpogrupocaser@caser.es

#### DATA PROCESSING CARRIED OUT THROUGH THE WEBSITE

Purposes of treatment	Additional information	Data categories	Legal basis	Conservation period
Surfing the web	Allowing you access to the information and content provided therein. We suggest you consult the documents of the Spanish Data Protection Agency (AEPD) on recommendations to Users to minimise the privacy risks derived from Internet browsing and information on technological security. In addition, if you access our website, we inform you that we will process your browsing data for analytical, advertising and statistical purposes, provided that you have accepted the corresponding cookies in accordance with the <u>Cookies Policy</u> provided for this purpose, and you may configure your preferences at any time in relation to the processing of your personal data for these purposes.	your web browsing supported by cookies, web pages you visit, connection	Your consent, in particular, in the case of accepting or authorising the use of cookies that so require, in accordance with the provisions of our <u>Cookies Policy</u> (ex art. 6.1 a) of the GDPR). Depending on the case, it will also apply to the satisfaction of the legitimate interest, either its own or that of third parties, associated with the adequate technical usability, management, maintenance, development and evolution of the website, tools, network and associated information systems (ex art. 6.1 f) of the GDPR).	essential and necessary time to enable you to browse and use our website and its contents correctly. With regard to the data associated with your browsing profile, in relation to the analytical cookies that you have accepted, you should pay attention to the section relating
To attend to your requests or requests	For this purpose, a contact form is available in the <u>"Contact"</u> section of the website.		Your consent	For the time strictly necessary to solve or attend to them.

		•	Personal data processed as a result of the consultation. Personal data related to your insurance policy.		
Manage your application in the selection process or to join the network of agents.	Through the sections " <u>Work with us</u> " or <u>"Become an agent"</u> and we will process your data in order to process your application in the personnel selection process, obtain your complete professional and personal profile to evaluate your suitability to occupy a specific job position or, if applicable, process your incorporation to CASER as an employee or Insurance Agent.	•	Personal identification data (name and surname). Personal contact details (personal telephone or mobile phone, e-mail). Personal data contained in the completed CV (professional experience, academic background, languages, professional skills, etc.)	The legal basis for processing your data during the recruitment process is the necessary implementation of pre- contractual measures at the request of the data subject (art. 6.1.b GDPR). If we want to keep your CV for future vacancies, we will ask for your consent (art. 6.1.a GDPR).	If your CV is not of interest, it will be destroyed immediately. Otherwise, it will be kept until the end of the selection process and, in any case, for 2 years from the collection of your CV or until you request the deletion of your data. After this period, we will destroy your CV unless we have your consent. to preserve it for future vacancies.
Manage your access to the digital customer channel.	Through the channel enabled on the platform in the " <u>Customer Access</u> " section.	•	Personal identification data (user). Your bank details, and those derived from the commercial relationship (policy number, claims data, coverage, contracted services, etc.). Passwords, users, codes, etc,	Execution of the contract you have signed with CASER.	For the periods necessary to give due satisfaction to the performance of the contract between the parties (duration of the contract between the parties). In addition, where applicable, and for the purposes of Law 10/2010, of 28 April, on the prevention of money laundering and terrorist financing, your data may be retained for 10 years from the termination of the business

					relationship or the execution of the transaction.
Manage any incident or complaint	To resolve any incident with your insurance, contact the Company, either at the addresses or telephone numbers that appear in the contractual documentation of your policy, through the office or mediator with whom you contracted it, or through the channels provided in the <u>"Insured's defence"</u> form. present on the platform	•	Personal identification data (name and surname, NIF). Personal contact details (personal telephone or mobile phone, e-mail). Personal data processed as a result of the claim (reason for the claim, product associated with your query, policy number if you are a CASER customer, etc.).	case may be, execution of pre-contractual measures	For the time necessary to correctly deal with your claims or, if they consist of the execution of pre-contractual measures or the signing of a contract with CASER, for all the time necessary to duly satisfy such execution or request.

#### **OTHER DATA PROCESSING**

Purposes of treatment	Additional information	Data categories	Legal basis	Conservation period
Formalisation and enforcement of the insurance contract or pre-contract, pension plan and fraud prevention.	<ul> <li>Manage the insurance relationship and the fulfilment of the contract or pre-contract, as well as the pension plan, including the following tasks:</li> <li>Risk selection, assessment and delimitation.</li> <li>Contribution management, exceptional liquidity events, benefits and fraud investigation.</li> <li>Carrying out actuarial and statistical studies and calculations.</li> <li>Quality control by means of satisfaction surveys.</li> <li>Under no circumstances will automated decisions be taken in the processing of your data.</li> </ul>	<ul> <li>data (name and surname, NIF).</li> <li>Personal contact details (personal telephone or mobile phone, e-mail).</li> <li>Data on customer interaction and behaviour with the company: responses to satisfaction surveys, complaints and recommendations.</li> </ul>	<ul> <li>October 1980, on Insurance Contracts.</li> <li>Law 20/2015, of 14 July, on the Regulation, Supervision and Solvency of Insurance and Reinsurance Entities.</li> <li>Royal Legislative Decree 8/2004, of 29 October, approving the revised text of the Law on civil liability and insurance in the circulation of motor</li> </ul>	Your personal data will be kept for as long as the contractual relationship is in force and will be deleted in accordance with the periods provided for by current legislation: Up to a maximum of ten years in accordance with the provisions of the regulations on the prevention of money laundering.

avtracted from third. The processing of the
extracted from third The processing of the party sources: personal data of the
party sources: personal data of the Policyholder, Participant or
<ul> <li>Financial and credit Insured, as well as of the detail.</li> </ul>
data: Information beneficiaries, is essential for
collected from files the selection of the risk, as
on solvency and well as for the initiation and
creditworthiness. development of the
contractual relationship with
<ul> <li>Data from files the Company.</li> </ul>
covered by standard
codes in the
insurance sector.
Consultation of third
• Consultation of third
party databases,
including data from
official registers
related to the
insured product.
Likowica depending on
Likewise, depending on the branch in which you
are interested, CASER
will process the following
categories of data:
$\circ$ For the household
<ul> <li>For the household sector:</li> </ul>
Details and/or
photographs of the
insured property
◦ For the motor
o For the motor industry
Details and/or
photographs of the
insured vehicle

		<ul> <li>Driving licence facts Information on administrative offences: consultation of third party databases, including data from official journals and gazettes. Health data in case of bodily injury.</li> <li>Data on behaviour and interaction between the parties involved in a declared claim during the policy term: Social media data or data that you have made manifestly public in the framework of a fraud prevention investigation.</li> </ul>		
Commercial profiling	In order to carry out commercial actions and provide you with the services that best suit your profile, we will use your data derived from the management of the policies and pension plans that you have taken out, as well as the tastes, hobbies		Your consent. Depending on the case, the satisfaction of the legitimate interest, associated with the targeting of users' interests	Your personal data will be processed for this purpose as long as you do not object to it and for up to two years after the end of your relationship with CASER.

	and needs that you have declared to us. We also inform you that no automated decisions will be taken on the basis of this profile.		(ex art. 6.1 f) of the GDPR), will also apply.	
Sending commercial information.	We will process your data in order to offer you, by any means of communication, including e-mail, SMS, MMS, or equivalent, commercial information about our products and services related to insurance and pension plans.	data (name and surname).	Your consent, unless the exception provided for in art. 21.2 of Law 34/2002, of 11 July, on information society services and electronic commerce, applies.	Your personal data will be processed for this purpose as long as you do not object to it and for up to two years after the end of your relationship with CASER.
Sending of commercial communications from CASER Group entities.	We will process your data to send you information and advertising, including by electronic means, about offers, products and services marketed by the various Group entities on the basis of profiling through analysis of the products contracted.	data (name and surname).	Your consent.	Your personal data will be processed for this purpose as long as you do not object to it.
Video surveillance	We inform you that our buildings have video surveillance systems, the purpose of which is to guarantee the security of people and facilities. When necessary in accordance with current legislation, your data may be transferred to the State Security Forces and Bodies, as well as to the Courts and Tribunals.	Data captured through video surveillance devices (images).	Public interest.	One month from the date on which they were captured.

When the legitimate basis for processing your personal data is your consent, we remind you that you have the right to revoke your consent at any time simply and free of charge by writing to us at derechosrgpdgrupocaser@caser.es.

With regard to the retention period, in general, when personal data is no longer necessary for the purposes for which it was collected, it will be blocked and will only be made available to the competent authorities for the possible purging of legal responsibilities during its processing, always in accordance with the applicable regulations, and may not be used for purposes other than these. Once the corresponding legal periods have elapsed in the event of blocking, your data will be deleted in accordance with the applicable regulations, and may also, if applicable, be securely anonymised by CASER (anonymised/non-personal data).

#### WHAT ARE THE CONSEQUENCES OF NOT PROVIDING US WITH YOUR DETAILS?

We endeavour to request or apply the minimum and essential data necessary to carry out the processing of personal data that we carry out in the full development of our corporate purpose and objectives. All of this is in accordance with the principles contained in the applicable regulations.

However, failure to provide your personal data may make it impossible for you to: 1) browse our website correctly (disable technical cookies); 2) process your specific request or application (for example, due to the lack of or insufficient completion of the forms provided on the website).

In any case, the information and personal data that you provide us with, according to each case, must in any case be: 1) sufficient, although adjusted, limited and provided to the forms on the website; 2) accurate, updated and truthful, in order to be able to adequately verify your identity and to be able to access the services of the website.

Users will be fully responsible for the personal data and information they provide to CASER within the framework of the Web Site and, if applicable, for the services they require or contract.

#### **DO WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES?**

In general, we do not share your data with third parties, nor do we sell or offer it to them. However, as a CASER client, your personal data may be shared with the entities that make up the CASER Group in which CASER is integrated, in the manner and for the purposes described in the contracts signed with our clients and to comply with the Supervision, Regulation and Solvency regulations. In accordance with the aforementioned purposes, your personal data may be communicated, where appropriate, to the following recipients:

- To Reinsurance Companies.
- $\circ$  To the Co-Insurers.
- Professionals providing services related to insurance contracts (lawyers, solicitors, experts, repairers...).
- Entities processing common files for the prevention of fraud.
- $\circ$   $\,$  To the Public Administrations in the cases provided for in the Law.
- To banks and financial institutions for the collection of premium receipts.
- To companies specialising in debt recovery
- In the area of pension plans and funds, to the Control Committee and to the insurance company that, where applicable, insures the Plan.
- State Security Forces and Corps.

#### • Courts and Tribunals.

Similarly, it is possible that certain third parties may access your personal information in the development of the services they may provide to CASER. For example, in the case of third-party cookies that are applied on the Website <u>(see cookies policy)</u>.

CASER has various people in charge of processing the personal data under its control, allowing access to them, as trusted suppliers, and to the extent strictly necessary for the provision of the services contracted with them. These data processors operate under a service contract under the terms, conditions and guarantees contained in article 28 of the RGPD, and CASER carries out the corresponding controls, inspections and audits in this area to check that these data processors strictly comply with the contracts signed for this purpose and the applicable regulations.

Likewise, if you have given your consent, your data will be transferred to the companies of the Caser Group, so that they can send you commercial offers about the products and services they sell by any means of communication, including SMS, MMS, e-mail or similar. You can consult here the companies that make up the Caser Group.

#### ARE YOUR PERSONAL DATA TRANSFERRED INTERNATIONALLY?

We inform you that, in general, international transfers of your personal data are not planned, and CASER will adopt the necessary measures and guarantees in this area in accordance with current personal data protection regulations. Notwithstanding the above, in our cookies policy you will find information on the use of cookies by third parties that could carry out international transfers of personal data. You can consult the privacy information of the third parties that serve cookies on this website through our Cookies Policy.

# WHAT RIGHTS DO YOU HAVE, WHAT DO THEY MEAN AND HOW CAN YOU EXERCISE THEM?

You may exercise your rights of access, rectification, deletion, portability, limitation of processing and opposition by writing to the company's registered office at Avenida de Burgos 109, 28050 Madrid (Indicate Asesoría Jurídica - Protección de Datos), or by e-mail to <u>derechosrgpdgrupocaser@caser.es</u>, enclosing, if necessary to prove your identification, a copy of your national identity card or equivalent identification document (passport, N.I.E., etc.).

For more detailed information on these rights, as well as to exercise your rights through the forms provided, you can access the <u>"Data</u> <u>Protection Rights"</u> section of our website.

We also inform you that if you do not consider that your personal rights have been duly addressed, you may file a complaint with the competent supervisory authority, in this case, the Spanish Data Protection Agency (AEPD). For more information, please visit the website www.aepd.es.

However, we recommend that before filing any complaint or claim with the AEPD you contact us, and especially the CASER Data Protection Delegate (dpogrupocaser@caser.es), in order to analyse the specific situation and try, if necessary, to find an effective and amicable solution.

#### ARE SECURITY AND PROTECTION MEASURES IN PLACE FOR YOUR PERSONAL DATA?

Taking into account the nature, scope, context and stated purposes of the processing, as well as the risks of varying likelihood and severity to your rights and freedoms, CASER applies (and will apply) appropriate technical and organisational measures in order to guarantee the due security and protection of your personal data, taking into account privacy criteria by design and by default, as well as applying a concurrent risk approach system that will be reviewed and updated by CASER when necessary. The use of the Hyper Text Transfer Protocol (HTTPS) on our website is a reinforced guarantee for the security of your personal data.

#### VALIDITY AND MODIFICATION OF THE PRIVACY POLICY

This policy is effective as of 06 of November 2023.

CASER reserves the right to modify this policy to adapt it to future legislative, doctrinal or jurisprudential developments that may be applicable, or for technical, operational, commercial, corporate or business reasons, informing you in advance and reasonably of any changes that may occur whenever possible. In any case, it is recommended that, each time you access this website, you read this policy in detail, as any modification will be published on this website.