Personal Data Processing Policy

1. Information on Personal Data Protection - Introduction

For INTERAMERICAN and its employees, respect for privacy and the protection of the confidentiality and security of the personal data of its policyholders, insurance beneficiaries, associates, natural person representatives of the insureds and/or insurance beneficiaries, claimants and/or petitioners and, generally, all other individuals (the "**Data Subjects**" or "**you**") who have transactions or otherwise interact in any way with the Company (as defined below) or whose personal data the Company processes in the context of its insurance activities, are a top priority.

We would like to assure you that the Company collects, processes and stores your personal data in accordance with the General Regulation for Data Protection (EU) 679/2016 as well as with any other applicable legislation and Decisions of the Romanian Data Protection Authority (the "**RDPA**") (i.e. the Romanian National Authority for the Supervision of Personal Data Processing) and takes all necessary measures to prevent incidents of theft, loss and leakage of personal data.

The Company processes the personal data of the Data Subjects as Data Controller of personal data, in accordance with the provision of this Personal Data Processing Policy (the "**Policy**").

The purpose of this Policy is to provide a clear explanation of when, why and how we collect and use personal information which may relate to You ("**Personal Data**").

Please read this Privacy Policy with care. It provides important information about how we use Personal Data and explains the statutory rights of the Data Subjects.

This Privacy Policy is not intended to override the terms of any insurance policy or contract which apply, nor any rights that the Data Subjects might have available under applicable data protection laws.

2. Who is responsible for processing your Personal Data

The data controller is "**INTERAMERICAN HELLENIC INSURANCE COMPANY S.A.",** headquartered at 124-126, And. Syggrou Avenue Zip Code 11782 in Athens, has SARN 25467/05/B/91/29 and GCRN 914001000 (the "**Company**", "**we**" or the "**Data Controller**"). We operate in Romanian through our branch, **Interamerican Hellenic Insurance Company S.A. Atena – Sucursala București**, headquartered in 319G Splaiul Independentei, RiverView House building, 2nd floor, Bucharest, sector 6, 060044, registered with the Bucharest Trade Registry under no. J2025033442009, sole registration code 51767670 (the "**Branch**").

Any Personal Data which you provide to us during your visit on the website **www.anytime.ro** is processed by the Company as the Data Controller.

If you have any questions regarding the processing of your Personal Data, if you would like to exercise any of your rights or file a complaint regarding the manner in which we process your Personal Data, you can contact our Data Protection Officer by sending

a request to **datepersonale@anytime.ro**.

Moreover, if you are not satisfied with our response to your request, you always have the right to contact the RDPA, which will resolve your complaints. The RDPA may be contacted at:

Autoritatea Nationala de Supraveghere a Prelucrarii Datelor cu Caracter Personal

Bvd. General Gheorghe Magheru no. 28-30

Sector 1, cod postal 010336

Bucharest, Romania

Please note that the RDPA offers a Complaints portal, which is available at: **https://www.dataprotection.ro/?page=Plangeri_pagina_principala**.

We encourage you to attempt to resolve any complaint or dissatisfaction you may have with respect to the manner in which we process your Personal Data directly with us, in the first instance. Before being able to take recourse to the RDPA, the RDPA will require you to first attempt to resolve your complaint with the Data Controller.

3. What categories of Personal Data do we collect and process?

The Company processes the following Personal Data about the Data Subjects:

(i) *Personal Data about prospective insureds and representatives/agents of prospective insureds,* in order to underwrite and administer the insurance products we underwrite, we collect information about the insured, policyholder and related parties (including insurance beneficiaries), as well as of any natural person legal representatives or agents of such parties whose data may be shared with us for the purposes of the (motor vehicle) Insurance.

This may include (depending on the type of insurance contracted with us) but is not limited to:

a. identification data (first name, last name, date of birth, ID/passport series and number, ID/passport issuance date, issuing authority, expiry date, domicile/residence, personal numeric code (CNP), gender, nationality).

b. contact information (email, telephone number, address).

c. Personal Data related to the insured asset (e.g. make and model of vehicle, license plate/registration number, chassis number, mileage, vehicle technical data, drivers' license details, relevant BONUS/MALUS class, claim/accident history, ownership of vehicle, geolocation).

d. Personal Data relevant to the assessment of risk and management of the insurance policy and KYC processes (e.g. payment data, bank account, card number, issuing bank, holder of bank account, sanctions and criminal offences, data included in any anti-fraud databases etc.).

(ii) *Personal Data about claimants*: if you are making a claim under or in relation to insurance we underwrite, we will collect your basic identification and contact details (including name, surname, email, telephone number, address), together with information about the nature of the claim, details of the applicable

insurance policy and claim history. Such Personal Data may also include settlement data i.e. Personal Data necessary for the management of insurance claims (including any Personal Data you may provide to us in any documentation and/or forms provided to us in support of a claim under insurance we underwrite).

(iii) *Personal Data about complainants/petitioners:* if you are not satisfied with our services and you submit a complaint/petition in relation to any insurance contract we underwrite, we will collect and process your basic contact details (including email, telephone number, address), together with information about the nature and scope of your complaint, as well as details of the underlying insurance policy.

(iv) *Personal Data about other drivers of the insured vehicle*, depending on the type of insurance contracted with us. Such personal data may include, but is not limited to: name, surname, date of birth, personal numeric code (CNP), ID/passport series and number, ID/passport issuance date, issuing authority, expiry date, for the purposes of assessing the risks related to the insurance we underwrite and for the issuance of the respective insurance policy.

(v) *Personal Data about Data Subjects visiting our website or using our customer support facilities*, such as browsing data (IP address, browsing history while on our website, etc), your voice and the content of your communication with us (which are recorded), the phone number you are using to call us etc.

Please note that, while using our website, cookies may be stored on the device you are using – for more information on how we use cookies, please visit our Cookie Policy available here: [**Link**].

4. How do we collect Personal Data?

We collect Personal Data from a number of sources, including:

(i) Directly from the Data Subject e.g. through the submission of the insurance application, application for modification/conversion/cancellation/ redemption, application for insurance benefit, claim for loss, when made directly by the Data Subject or when you visit our website or use any of our customer support services/facilities.

(ii) Through our authorized employees or through insurance intermediaries and aggregators that we engage for the purposes of distributing our insurance to you.

(iii) From other third parties e.g. certain special categories of Personal Data (which is mainly health data), may be collected by the Company, in addition to those that you disclose to us directly, through contracted health service providers (e.g. hospitals, private clinics, diagnostics centers, doctors).

(iv) From the visitors/users of our website, only when they voluntarily provide them in order to process the submitted electronic requests.

(v) Also, from promotional actions for the promotion of our products/services, from the collection of contact information for sales purposes (leads) where we (or our marketing or other agents) collect Personal Data with the condition of

your explicit consent for their further processing.

5. What purposes do we process your Personal Data for?

With the insurance application you submit to the Company in order to be insured, you declare that you want to transfer the risk you have chosen to the Company. Based on the information/data you provide to us in your insurance application, we place you in a homogeneous risk category and calculate, based on your statements, the appropriate and proportional insurance premium for you, calculating and estimating, among other things, the frequency and intensity of the loss that may occur.

To do this, it is necessary to provide us with the specific Personal Data mentioned in the relevant fields of the insurance application. These elements are objectively essential for the assessment of the insurance risk and for the fulfillment of the purpose and the operation of the insurance policy. The provision of the correct and complete information of data we ask you for and on which we rely is your obligation pursuant to the insurance and the applicable law (including, but not limited to, Art. 2203-2204 of the Romanian Civil Code) and this is how we will be able to place you in the appropriate risk group and correctly calculate the premium you have to pay for your coverage.

The provision of inaccurate or incomplete information by you may establish our right to request even the cancellation or termination of your insurance policy, in accordance with the law.

Based on the above, we process the Personal Data of our insureds and/or all other Data Subjects we have transactions or otherwise interact with in the context of the provision of insurance by us, for more than one purpose and only for the purposes for which we collected them, unless we reasonably consider that we must use them for another reason and that this reason is compatible with the original purpose, in particular:

Purpose/Activity	Legal Basis
(1) To assess the risk assumed, determine the terms of insurance and the premium, and to conclude the requested insurance policy, its management during its validity, the control and settlement of the compensation in case of risk and the payment of the amount stipulated in the terms (insurance fee) and the prevention and avoidance of insurance fraud in order to defend the legal interests of the interested parties and the insurance company.	(1.a.) Processing is necessary for the execution of the contract of insurance (policy). (1.b.) Or/and with your consent after the provision of specific information

(2) In the case of road accidents with bodily injuries, we collect and process special categories of Personal Data (e.g. health data)	(2.a.) With the explicit consent of the Data Subject, after the provision of specific information (2.b.) Processing is necessary for the execution of the insurance contract (policy) (2.c.) Processing is necessary to comply with a legal obligation incumbent upon us (2.d.) To establish, exercise or support legal claims
(3) For cases of car damage reporting and compensation settlement, we collect and process personal data that come to our knowledge due to an accident in which a third party is in any way involved. Access to this Personal Data by the Company is necessary in order to be able to process the claim for compensation. For this very reason, if as a third party you do not consent to the processing of your Personal Data or object to it before the settlement of your claim is completed, it will not be possible for the compensation process to be implemented.	(3.a.) With the explicit consent of the Data Subject after the provision of specific information (3.b.) Processing is necessary for the execution of the insurance contract (policy). (3.c.) To establish, exercise or support legal claims.
(4) For the compliance of the Company with obligations deriving from the current legislation, such as the tax legislation, the legislation for the prevention and combatting of money laundering and the fight against Terrorism, the UN and EU Sanctions Lists, the legislation for the exchange of Financial Accounts data for US residents	(4) The processing is necessary for the Company to comply with legal obligations.
(5) To manage a request/complaint.	(5) The processing is necessary for the compliance of the Company with obligations provided by the current legal and regulatory framework.
(6) To conduct marketing activities, market research that the Company can carry out to investigate the level of customer satisfaction with the quality of the Company's services, as well as the commercial promotion of new products and services.	(6.a.) The processing is necessary for the improvement of the Company and the satisfaction of its legitimate interests. (6.b.) With the consent of the Data Subject after the provision of specific information
(7) To conduct investigations that the Company may carry out in order to prevent, combat and limit insurance fraud by conducting audits in relation to other, past or future, insurance or compensation	(7) Processing is necessary for the satisfaction of the legal interest of the Company to reduce phenomena of deception in favor of the numerically superior society of the

claims.	bona fide insured individuals and the insurance credit in general.
(8) If you telephone us (e.g., when notifying a claim or discussing that claim with us) or if we call you (e.g. to sell an insurance policy) we may record the telephone call. We may also use Interactive Voice Response (IVR) technology to automate responses to voice commands, and to analyze call recording data. We use call recordings as an evidence of your agreement to purchase an insurance policy or submit a claim, to help train our staff and to provide an accurate record of the call in case of complaints or queries. We may also analyse call recordings using automated technology in order to detect where there may be customer service failings (and then to resolve these), or to detect potential evidence of fraud.	(8.a.) the processing is based on the consent of the Data Subject (8.b.) the processing is necessary for the performance of the insurance contract (policy) or to take steps at the request of the Data Subject prior to entering into a contract (8.c.) Processing is necessary for the purposes of the legitimate interests of the Company or a third party

Where the above table lists more than one legal basis regarding a purpose or activity, these may apply alternatively and the Company may rely, as the case may be, only on some of them (and not necessarily on all), depending on the particular circumstances.

We will make sure that we only use your Personal Data for the purposes set out in this Section 5 and where we are satisfied that:

- ✓ the Data Subject has provided consent to us using the Personal Data in that way; or
- ✓ our use of your Personal Data is necessary to perform a contract or take steps to enter into a contract with you or the person or entity the Dat Subject represents; or
- ✓ our use of your Personal Data is necessary to comply with a relevant legal or regulatory obligation that we have; or
- ✓ our use of your Personal Data is necessary to support 'legitimate interests' that we have as a business (for example, to improve our products, or to carry out analytics across our datasets), provided it is conducted at all times in a way that is proportionate, and that respects your privacy rights.

6. Who do we disclose your Personal Data to?

- ✓ Your Personal Data will be used by the Data Controller internally and will be transmitted to our departments that are responsible for underwriting, or with the proper and uninterrupted implementation of your insurance policy, as well as for your compensation. Indicatively, we mention the Underwriting Department, the Issuance Department, the Compensation Department, the Actuarial Department, the Legal Service, the Regulatory & Compliance Department, etc..
- ✓ Your Personal Data may be disclosed and made accessible to third parties, including:
  - to legal entities and/or natural persons with whom we collaborate, from time to time, for the purposes of distributing the insurance we underwrite e.g. aggregators and other insurance intermediaries/agents;
  - to legal entities and/or natural persons with whom, from time to time, we

maintain cooperation agreements for the correct and appropriate (based on the terms of the insurance policies) compensation of the insured, as well as for the correct assessment of the loss;

- also, your Personal Data, in the context of the operation of your insurance policy can be transmitted to various other third parties, such as hospitals, doctors, public authorities, compensation researchers, etc, to the extent necessary to provide the insurance or manage claims under the insurance.
- to our parent company "Achmea B.V.", headquartered in the Netherlands, as well as other affiliated companies of the same Achmea Group, within the European Union. In this case no specific category of Personal Data is transmitted unless there is a legal obligation..
- to insurance brokers affiliated with the Company, reinsurers, to cooperating insurance companies to provide insurance coverage, to experts, researchers, claims management companies, attorneys, judicial guardians, etc.,
- to contractual partners providing services to the Company such as file storage and management, file destruction, IT service providers, cooperating telephone service providers etc. However, you should be aware that, in any case of such transmission, the data transmitted are the minimum necessary and the legal and/or natural persons who will process them will act as processors solely for the purpose of providing services to us.
- to public services, insurance funds, judicial, public and independent authorities, such as the supervisory authorities such as the National Bank of Greece, the Romanian Financial Supervisory Authority, the Romanian Bureau of Motor Insurers, the Consumer Protection Authority, police departments, traffic Police, prosecution authorities etc;
- to our legal counsel and other professional services providers, such as independent auditing companies upon their legal request, if this is absolutely necessary or useful for the management and evaluation of claims and/or defense of our legal rights, and/or the fulfillment of the Company's obligations under the applicable law;
- to any competent authority in the money laundering/terrorist financing/international sanctions sector, in the context of the Company’s compliance with the legislation for the prevention and suppression of money laundering and the fight against terrorism (for the exchange of information of financial accounts in the tax sector) ;
- to loss adjusters and claims experts who help us assess and manage claims, as well as other service providers we engage in the provision of the services to you (e.g. road assistance services) in the context of the insurance;

Especially in motor insurance policies, your Personal Data may be transferred to car accident investigators, vehicle maintenance companies, residual value management companies of damaged vehicles, the Romanian Bureau of Motor Insurers, the Insurance Guarantee Fund etc for the execution of their responsibilities provided by law, for the protection of the insurance market and the avoidance of insurance fraud;

- to other insurance companies in order for a settlement to take place under the direct accident damage settlement agreement.

7. Automated data processing

Automated processing of Personal Data and relevant (automated) decision may be carried out only for the purposes of the insurance of cars and other vehicles, mainly through the direct sales channel "Anytime". Through these automated channels, in which the risk-assumption rules applied by the Company have been largely incorporated, decisions are made more quickly, with greater accuracy, transparency and consistency.

The Company may use automated tools in case of underwriting, however, in cases of denial of insurance, these are controlled by an officer of the Department of Underwriting. More specifically for the cases where automated data processing is performed as described above, the following applies:

(a) Automated processing is necessary for the assessment of the insurance risk, i.e. in order for the Company to propose the most suitable and appropriate insurance product as well as the strictly proportional price for its insurance (insurance premium). More specifically, the logic of the automated processing is based on mathematical or statistical analyses from the point of view of insurance technical parameters that have been adopted by the Company and enable: i) the objective risk assessment, ii) its inclusion in a homogeneous risk group based in particular the frequency and (iii) the extent of the damage that risk may entail, as well as its proper pricing.

(b) Based on this automated processing, a higher premium may occur. However, in these cases, regular inspections are carried out by our competent officials.

(c) The Company takes all the measures required under the General Data Protection Regulation when making a decision based on automated processing, including profiling, and these measures are specifically concerned with ensuring human intervention, the use of appropriate statistical or mathematical procedures and the application of technical and organizational measures, in order to correct factors leading to inaccuracies and to minimize the risk of errors during processing.

(d) The Company may, finally, use automated procedures during the validity of the insurance policy, in order to carry out audits to prevent insurance fraud and for its compliance with the obligations arising from the legislation for the prevention of money laundering and automatic exchange of information on financial accounts. We are also committed and carry out any relevant processing to comply with FATCA (relevant only for U.S. individuals).

(e) You have the right to express your opinion on a decision taken under the above automated procedure, to challenge it and request its reconsideration by a competent official. To exercise your rights, you should contact the Data Protection Officer (contact details **datepersonale@anytime.ro**).

8. How long do we retain your Personal Data?

We maintain your Personal Data for various retention periods, depending on various

factors, such as whether you have contracted insurance from us or not, whether you have submitted a claim under the insurance, whether you have submitted a complaint or petition with us etc.

We will retain your Personal Data for as long as is reasonably necessary for the purposes listed in Section 5 of this Policy. In some circumstances we may retain your Personal Data for longer periods of time, for instance where we are required to do so in accordance with an instruction or binding order of a court or competent authority, or in order to comply with legal, regulator, tax or accounting requirements.

In specific circumstances we may also retain your Personal Data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to the Insurance (and in which your Personal Data may be relevant to the matter). In such cases, your Personal Data will be retained for the duration of the relevant insurance agreement, and for a period of 5 (five) years thereafter (which includes the statute of limitations for claims related to the insurance).

We maintain a data retention policy which we apply to records in our care. Where your Personal Data is no longer required for the purposes set out herein we will ensure it is either securely deleted or stored in a way which means it will no longer be used by the business.

We will keep your data for as long as you maintain a contractual relationship with us, in both paper and electronic form. In the event that, for any reason, this relationship is interrupted, we will keep them for as long as required until the limitation period of any relevant claims expires.

However, if the application for insurance or amendment of the insurance policy that you submitted to us has not been accepted, we will keep the Personal Data you have provided to us during the application process for a period of up to 5 (five) years from submission, unless a legal dispute is pending beyond the above processing times and until its termination by an irrevocable court decision.

Records of your interactions with us via phone are kept on file for up to 5 (five) years and then deleted.

9. Use of cookies

Our Company uses cookies for the smooth operation of its website. For more information, please read our Cookie Policy available here [**Link**].

10. What rights do you have in relation to the processing of your Personal Data?

You have the rights set out in the General Regulation on Personal Data Protection (GDPR, Regulation (EU)) 2016/679) with respect to the processing by us of your Personal Data - more specifically, you can exercise, as the case may be, the following rights:

(1) **the right to access** the Personal Data about you which we process, the purposes of processing and the legal basis of processing, the recipients of your Personal Data, as well as to receive copies of your Personal Data which the Company processes.

(2) **the right to correct/rectify** any omissions or inaccuracies in your Personal Data.

(3) **the right to delete** any Personal Data concerning you, if you no longer wish this Personal Data to be processed, and if there is no legal reason for our Company to hold and process it as Data Controller.

You can ask us to erase your Personal Data, but only:

- where it is no longer needed for the purposes for which it was collected; or
- if you have withdrawn your consent (where the data processing was based on your consent); or
- following a successful right to object (see below); or
- if it has been processed unlawfully; or
- if required to comply with a legal obligation to which we is subject.

We are not required to comply with your request to erase your Personal Data if the processing of your Personal Data is necessary:

- for our compliance with a legal obligation; or
- for the establishment, exercise or defense of legal claims;
- as otherwise permitted under the data privacy legislation.

When can we refuse deletion requests? You should be aware that the right of deletion is not an absolute right, it cannot be satisfied when your Personal Data is processed for specific legal reasons, such as those described above, including the exercise or defense of the Company's legal claims.

Do we have to inform other recipients of your Personal Data, when there is a deletion request? In the event that your right to delete Personal Data is satisfied, we will take steps to inform any third parties to whom we have disclosed your Personal Data of your deletion request so that, in turn, they can delete such Personal Data; however, this may not always be possible or it may involve a disproportionate effort on the part of our Company.

(4) **the right to restrict the processing** of your Personal Data where:

- you contest the accuracy of the Personal Data we process about you, to allow us to verify its accuracy; or
- the processing of your Personal Data is unlawful, but you do not want it erased; or
- the processing of your Personal Data by us is no longer needed for the purposes for which it was collected;
- you have exercised the right to object, and a verification of overriding grounds is pending.

Do we need to inform other recipients of your Personal Data about the restriction? In the event that we have shared your Personal Data with third parties, we will take action if possible to inform them of the limitation of the processing of your Personal Data, so that they do not continue to process it.

When can we refuse requests to restrict processing? You should be aware that this right is not an absolute right, it cannot be satisfied when your Personal Data is processed for specific legal reasons, such as those described above, including the exercise or defense of legal claims of the Company.

(5) **the right of portability** i.e. to receive the Personal Data you have disclosed to us in a structured and commonly used format.

(6) **the right to revoke your consent**: You have the right to withdraw your consent to the processing of your Persona Data by us at any time, in cases where we rely on it to process your Personal Data. However, this will not affect the legality of any processing that has taken place before your consent is revoked. If you revoke your consent, we may not be able to offer you certain insurance products or services. We will let you know if this is the case when you withdraw your consent.

(7) **the right to object**, on grounds relating to your particular situation, to the processing of your Personal Data which is based on our legitimate interests. In this case, we shall no longer process your Personal Data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

(8) **the right to defer a dispute or complaint related to the processing of your Personal Data to the supervisory authority** - you have a right to lodge a complaint with the RDPA about our processing of your Personal Data.

You can use the RSPA's Complaints portal for this purpose (available at: https://www.dataprotection.ro/?page=Plangeri_pagina_principala).

Please note that the RDPA requires that any privacy related complaints be first resolved with the relevant data controller. Recourse to the RDPA may be sought if (a) you have not received a response from us with respect to your request within 1 (one) month of submission; or (b) you remain dissatisfied with our response.

(9) **the right to request information about the transfer of your Personal Data abroad** - you can ask to obtain a copy of, or reference to, the safeguards under which your personal data is transferred outside of the European Economic Area. We may redact data transfer agreements or related documents (i.e. obscure certain information contained within these documents) for reasons of commercial sensitivity.

Please clearly state in your application the right you exercise in relation to the personal data you request. If your application is not clear, we may ask you for further personal information for clarification. In order to be able to process your respective request, we can request proof of identity, passport and several additional personal data, to safely locate the personal data you request.

We will not ask for a fee to exercise any of your rights in relation to your Personal Data, unless your request for access to information is unfounded, repetitive or excessive, in which case we will charge a reasonable amount in the circumstances. We will let you know of any charges before completing your request.

If you exercise any of these rights, we will take all possible measures to satisfy your request within **thirty (30) days** of receiving it, after informing you either of its

fulfillment or of the objective reasons that prevent its fulfillment. While we aim to respond to any valid requests within one month, we may extend such period to 2 (two) months, if your request is particularly complicated, or you have made several requests. We will let you know if we are going to take longer than one month.

11. How do we ensure the safety of your Personal Data?

We are absolutely committed to safeguarding your Personal Data. To achieve this, we apply all modern and appropriate technical and organizational measures (as is appropriate for the scope of the Personal Data processing), the response of which we check at regular intervals in order to:

- protect your Personal Data from unauthorized access and improper use;
- secure our computer systems and protect the information.

Indicative measures that support both the physical and electronic security of the data processed in our Company are the physical presence of security in our buildings, the installation of closed circuit monitoring of critical for us areas, the implementation of Fair Resource Policy, Security Policy and support processes, the installation of a firewall, antivirus software (antivirus, antimalware), the application of data leak prevention system (dlp), the use of 2-factor authentication (2 Factor Authentication), occasional encryption and more.

12. Do we process your Personal Data for commercial purposes?

For the duration of the processing of your Personal Data mentioned above, we may process only non-sensitive categories of Personal Data also for the purposes of promoting other or additional to your needs insurance products or services, or of our Company, or other companies of the INTERAMERICAN Group, or for conducting targeted marketing activities or market research, under the express condition that you have given us your explicit consent.

The Company may, in this context, send you updates promoting services or new products, special offers using the communication methods you have stated during the conclusion of our cooperation.

The relevant actions may be carried out through partner companies (MailChimp, Facebook, Eloqua), which means that your Personal Data will be transmitted to the partner research and promotion companies. If you would like us to stop sending you such marketing updates, you can do so at any time. Each time you receive an immediate service promotion update, we will let you know how you can withdraw your consent.

You may object at any time to this processing of your Personal Data (for commercial or research purposes) by sending a request to the Data Protection Officer. In this case, your data will no longer be processed for commercial or research purposes.

13. International transfers

From time to time, we may need to share your Personal Data with members of the

InterAmerican group and/or contractual partners who may be based outside Europe (outside of the European Economic Area).

We may also allow our third-party service providers, who may be located outside of Europe, to access your Personal Data for the purposes of managing the insurance. We may also make other disclosures of your Personal Data overseas, for example if we receive a legal or regulatory request from a foreign law enforcement body.

We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests, including – but not limited to – by implementing the following safeguards:

- ✓ we will only transfer your Personal Data to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights.
- ✓ transfers within the InterAmerican group of companies will be covered by an intra-group agreement which gives specific contractual protections designed to ensure that your Personal Data receives an adequate and consistent level of protection wherever it is transferred within the insurer's group.
- ✓ transfers to service providers and other third parties will always be protected by contractual commitments and where appropriate further assurances.
- ✓ any requests for information we receive from law enforcement or regulators will be carefully checked before Personal Data is disclosed.

You have the right to ask us for more information about the safeguards we have put in place in relation to transfers of your Personal Data abroad, as mentioned above.

14. Data Protection Officer

For questions in relation to how we process your Personal Data, or any complaints in relation thereto, please email us in the first instance at: **datepersonale@anytime.ro** or write to us at our headquarter address in Bucharest, Romania.