

INFORMATION OBLIGATION CLAUSE

LUX MED Ubezpieczenia Towarzystwo Ubezpieczeń i Reasekuracji S.A.

Below you will find all necessary information regarding the processing of your personal data in connection with your insurance coverage.

Who is the controller of your data?	Your personal data processed for the purpose of providing insurance coverage to you is controlled by LUX MED Ubezpieczenia Towarzystwo Ubezpieczeń i Reasekuracji S.A., with its registered office at ul. Szturmowa 2, 02-678 Warsaw, entered in the Register of Entrepreneurs of the National Court Register by the District Court for the capital city of Warsaw, 13th Commercial Division of the National Court Register, under KRS number 0001192054, Tax ID No (NIP): 5214131363, (hereinafter referred to as “we”, “Insurer” or “LUX MED Ubezpieczenia”).
Who can you contact regarding the processing of personal data?	In all matters relating to our processing of your personal data, you can contact the Data Protection Officer, by writing to the e-mail address: daneosobowe@luxmed.pl .
What is the source of data – where is data obtained from?	<p>The insurance coverage is provided on the basis of a contract concluded between us and the Policyholder who reports you for the insurance coverage. If you make a declaration via the electronic platform, the following types of your personal data:</p> <ul style="list-style-type: none">• first name• surname• personal ID No (PESEL) (if you don't have one, then the date of birth)• number, series and type of document (passport or identity card)• e-mail address <p>are provided to us by the Policyholder. If you are a co-insured person, the above data is provided to us by the Main Insured Person reporting you for the insurance coverage. If you enrol in the insurance by filling in a paper declaration, the declaration together with your full personal details, which you complete as indicated in the following section, is provided to us through the entity reporting you for the insurance coverage (this does not apply to a medical questionnaire which, if required, is submitted to us directly by you). Other data necessary for you to enjoy the services covered by insurance will be provided by you as you are using the insurance coverage. Additionally, as part of the adjustment of claims reported to us under your travel insurance (if applicable), we may ask you to provide copies of tickets, invoices, incident reports and similar documents substantiating your entitlement to reimbursement.</p>
What is the scope of personal data we process?	<p>We process personal data to the extent necessary to verify your identity, conduct an insurance risk assessment and provide the services covered by insurance. The scope of data we process includes:</p> <ul style="list-style-type: none">• full name• personal ID No (PESEL)• gender• date of birth• residence address• main place where you access healthcare services <p>If you are a foreigner, we will also ask you for your:</p> <ul style="list-style-type: none">• citizenship• number, series and type of document (passport, identity card or residence card) <p>In order to enable you to submit an insurance enrolment declaration via the electronic platform and to facilitate the subsequent provision of services, we may also ask you for your:</p> <ul style="list-style-type: none">• phone number• e-mail address <p>Depending on the terms of the Insurance Contract concluded with us by the Policyholder, we may ask you to complete a medical questionnaire, which is part of the insurance risk assessment. The questionnaire will include questions about your age, weight, height, health condition, profession or job position (including its characteristics) and your employer. We may approach you or, if you grant us appropriate authorisation, we may approach the healthcare entities you have used or are using, in order to obtain your medical records, information about your health or other information necessary to make a decision on the service provision, correct coordination of a service or claim adjustment. If, for the purposes referred to in the preceding sentence, we require your medical records, we will ask you to provide us with a copy of the records to the extent necessary, or on the basis of your consent, we will request the relevant healthcare entities to make the said records available. Your consent to the processing of data for marketing purposes includes information you have provided to us in the course of your relationship with us, including identifying information such as: first and last name, gender, date of birth, age, place, scope of insurance coverage. However, we assure you that, as part of our marketing activities, we will never use your medical records that you have provided to us or that we obtain from healthcare entities on the basis of your relevant authorisation – this information may only be accessed by authorised persons. When sending marketing communications, we may use your e-mail and/or phone number based on separate consent.</p>

<p>What is the purpose of processing of your personal data?</p>	<p>We process personal data as an insurance entity and the purpose of this processing is to assess insurance risk and to perform the insurance contract, which we understand as follows:</p>	
	<p>Purpose of processing</p>	<p>Legal basis (full names of the legal acts can be found at the end of the form)</p>
	<ul style="list-style-type: none"> Establishing your identity before providing you with a service and enabling us to perform the contract and contact you. Insurance risk assessment carried out prior to the conclusion of the contract, processing of personal data in the course of the assessment, and claims adjustment. On the basis of your separate consent to obtain medical records from the healthcare entities you have used or are using and to make the records available to the healthcare entities which, as part of insurance coverage, are supposed to provide medical services. LUX MED Ubezpieczenia also processes information on your health contained in such records. 	<p>Article 6(1)(b) of the GDPR in conjunction with Article 41(1) of the Insurance Act.</p>
	<ul style="list-style-type: none"> If you have shared your opinion on the services or made a complaint, we may process your personal data in order to examine your submission and respond to it. 	<p>Article 6(1)(f) of the Regulation, as the so called legitimate interest of the controller, which is the examination of claims and the defence of the Insurer's interests.</p>
	<ul style="list-style-type: none"> As a data controller being an entrepreneur, we have the right to pursue claims related to our business activity and to process your data for this purpose. 	<p>Article 6(1)(b) and (f) of the GDPR, as the so-called legitimate interest of the controller, which is the pursuit of our claims and protection of our rights.</p>
	<ul style="list-style-type: none"> As an entrepreneur, we keep accounting books and have tax obligations – we issue invoices for the services we render, which may necessitate the processing of personal data. 	<p>Article 6(1)(c) of the GDPR in conjunction with Article 74(2) of the Accounting Act of 29 September 1994.</p>
	<ul style="list-style-type: none"> If you have consented to the processing of your personal data for marketing purposes, we may process your personal data in order to send you marketing communications concerning activities of the LUX MED Group, such as in particular offers, information about services, promotions and events organised by LUX MED Group entities, as well as pro-health articles. Based on your consent, we may also process your personal data obtained in the course of our relationship, for marketing purposes. As part of this consent, we may also engage in the so-called profiling, which involves the automatic assessment of certain personal factors that concern you. The purpose of profiling carried out by LUX MED is to select the appropriate content of (marketing and/or promotional) materials we send you. 	<p>Article 6(1)(a) of the Regulation (voluntary consent).</p>
<p>Is your data processed by automated means?</p>	<p>As part of our insurance risk assessment, we may process your personal data (including special categories of health data) contained in your completed declaration and the medical questionnaire, and this will be done by automated means, including through profiling. This means that your personal data will be processed by an IT system without human intervention, which will lead to a decision on accepting your declaration or assigning you to a specific insurance plan. The legal basis for such actions by LUX MED Ubezpieczenia are the regulations governing our business activity as an insurance entity. However, please be informed that you have the right not to be subject to a decision based on automated processing of personal data.</p>	
<p>To whom do we transfer your personal data?</p>	<p>Personal data may be transferred to the following categories of recipients in connection with our business activity:</p> <ul style="list-style-type: none"> entities providing us with technical and organisational solutions that enable us to render services and manage our organisation (in particular ICT service providers, courier and postal companies), providers of legal and advisory services and services supporting us in pursuing due claims (in particular law firms, debt collection companies), reinsurance undertakings which will be reinsuring the risk assumed by us under the contract, healthcare entities that provide healthcare services under the Insurance Contract, as well as other healthcare entities whose services you use, entities that coordinate, on our behalf, the provision of healthcare services and services covered by the Insurance Contract, <p>As part of the service coordination process, your medical records that you have provided to us or that we have obtained on the basis of your consent may be made available by LUX MED Ubezpieczenia to the healthcare entities you use, through the coordinator assigned to you to support your hospitalisation and treatment.</p>	

<p>Is your data transferred to third countries?</p>	<p>Due to the fact that we use services of other entities (e.g. providers of ICT solutions), your personal data may be transferred outside the European Economic Area (which includes the EU Member States, Iceland, Norway and Liechtenstein). We assure you that in such a case, the data will be transferred on the basis of relevant legal grounds, e.g. an agreement concluded between LUX MED Ubezpieczenia and the respective entity, containing standard data protection clauses adopted by the European Commission, or on the basis of the European Commission's adequacy decision pertaining to data protection. LUX MED Ubezpieczenia guarantees that for every such transfer it adequately verifies the service provider to whom the personal data is being transferred to ensure that it processes the same in a compliant and secure manner.</p>
<p>How can we profile your data?</p>	<p>Profiling consists in our creating preference profiles based on your information and then using such profiles to customise our services and the content you receive from us – the processing of personal data as part of this process is based on your marketing consent. We assure you that profiling does not involve merely fully automated processing of personal data without any human intervention.</p>
<p>How long is your personal data processed for?</p>	<p>We store personal data for the duration of the contract and then for the statute of limitations for claims arising from the provisions of civil law. We process all data required for accounting and tax purposes for 5 years from the end of the calendar year in which the tax obligation arose. If you have consented to the processing of data for marketing purposes, we process your data from the time of your consent until it is revoked. After the expiry of the aforementioned periods, personal data is erased or anonymised.</p>
<p>Is the provision of data mandatory?</p>	<p>Enrolment in the insurance is fully voluntary, however, as an insurer, we are obliged to identify you and perform an insurance risk assessment using personal data. In such a case, failure to provide data may result in refusal to conclude a contract or to provide services. Also, for accounting and tax reasons, we have a legal obligation to process data; and failure to provide the data may render issuing an invoice or a personal bill impossible. The telephone number is provided on a voluntary basis – the lack of this information does not affect the use of our services, but it will make it significantly more difficult for us to contact the authorised person in the performance of the contract. Any marketing consent is also voluntary. This means that the refusal to provide data will not affect the use of our services and, at the same time, the person who gave consent has the right to withdraw it at any time.</p>
<p>What rights do you have?</p>	<p>As a data controller, we guarantee you the right of access to your data, as well as the right of rectification, erasure or restriction of processing of your data. You also have the right to object to our processing of your data and the right to transfer your data to another controller. To exercise any of these rights, contact us via the phone line, using the form available on the website or writing directly to our Data Protection Officer. Also, please be advised that you have the right to file a complaint with the authority supervising compliance with personal data protection regulations.</p>
<p>Definitions and abbreviations</p>	<p>GDPR – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC; Insurance Act – the Act of 11 September 2015 on insurance and reinsurance activity.</p>