

## **Client Privacy Policy**

### **Information about the processing of personal data**

Our company, Total Brokers a.s., with its registered office at Táborská 619/46, Nusle, 140 00 Prague 4, ID:27379345, is committed to protecting the personal data you provide to us. It is important to us that you know that we process the personal data you provide to us responsibly, transparently and in accordance with 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 (General Data Protection Regulation; hereinafter referred to as "GDPR") and other related legislation. The purpose of this document is to inform you of your rights arising from the fact that our company processes your personal data. If you have any questions or requests regarding processing your personal data, don't hesitate to contact us in writing at our registered office.

### **Legal basis and purposes of the processing of personal data**

We process your data for the following purposes

1. Client identification

Without proper identification of you, we could not arrange the contract you requested or provide you with customer service and other services. Therefore, we need to know who you are. For this purpose, we process your identification and contact details.

Legal basis for the processing of personal data:

- To carry out pre-contractual measures,
- The processing is necessary for the performance of the contract,
- processing is necessary to comply with a legal obligation.

2. Preparation of proposals for mediated contracts, modelling of insurance, calculation of premiums, modelling of other products offered, making changes to the contractual documentation and checking its compliance with the interests and requirements of the policyholder (client);

We always strive to offer products that best meet your needs and expectations. In order to prepare the specific content of the contracts and to determine the particular contractual conditions based on your needs, we also need to know your personal data, which you voluntarily provide to us for this purpose. If some of your information changes, the content of the policies you have previously taken out may also be changed to reflect your current situation (e.g. adjustment of the premium amount). For this purpose, we process your identification and contact details, data relating to your personal circumstances and contractual relationships, data relating to our services and data obtained when you visit our website. When brokering a life or accident insurance contract, we also process your health data and, where applicable, genetic data.

Legal basis for the processing of personal data:

- To carry out pre-contractual measures,

- The processing is necessary for the performance of the contract,
- Your explicit consent to the processing of health data.

3. Compliance with pre-contractual information requirements;

When providing our services, we are generally required to provide you with a range of information to help you choose a suitable product and how to set it up or to help you decide whether to enter into a brokered contract on the terms we offer. To fulfil these obligations, we also need to process your personal data, in particular, to assess your need for insurance protection, creditworthiness, ability to make investment decisions, and the suitability of other products we offer. For this purpose, we process your identification and contact details, data relating to your personal circumstances and contractual relationships.

Legal basis for the processing of personal data:

- The processing is necessary to comply with a legal obligation (under the Civil Code and the Insurance Distribution and Reinsurance Act).

4. Customer service;

We try to organise our procedures and system of communication with our customers so that we can always meet all your requirements quickly and efficiently, regardless of the product you choose or the changes you wish to make to the contracts you have concluded. When you contact us by telephone or e-mail, we record these communications to provide you with the answer or solution to your problem and improve our customer service. For this purpose, we process your identification and contact data, data relating to your personal and contractual relationships, data relating to our services and data obtained when you visit our website.

Legal basis for the processing of personal data:

- The processing is necessary for the performance of a contract,
- The performance of pre-contractual measures,
- The processing is necessary to protect our legitimate interests.

5. Monitoring the fulfilment of the obligations of tied agents, improving the distribution network;

In the context of our services, we must carry out the intermediary activity with professional diligence and protect the consumer's interests. We are also interested in the proper and efficient provision of our services and ensuring the proper functioning of our intermediary activities. We check our tied agents and other partners and employees and keep internal records of our activities. For this purpose, we process your identification and contact data, data relating to your personal and contractual relationships, data relating to our services and data obtained when you visit our website.

Legal basis for the processing of personal data:

- Processing is necessary to comply with a legal obligation (Insurance Distribution and Reinsurance Act),
- The processing is necessary to protect our legitimate interests.

6. Market monitoring and research;

We continuously analyse the level and scope of our services and compare them with current market developments to offer products in line with the latest market trends and on the best possible terms. To this end, we process your identification and contact data, data relating to contractual relations, data relating to our services and data obtained when you visit our website.

Legal basis for the processing of personal data:

- Processing is necessary to protect our legitimate interests.

7. Marketing purposes;

We process your identification and contact data, data relating to contractual relations and data on the use of services for marketing purposes based on our legitimate interest and also under the conditions of Act No. 480/2004 Coll., on certain information society services and on amendments to certain acts (Act on certain information society services) to provide our services.

Legal basis for the processing of personal data:

- Processing is necessary to protect our legitimate interests.

8. Establishment, exercise and defence of our legal rights, recovery of debts;

We may use your personal data in the context of judicial or administrative proceedings to which we are party and which relate to a legal relationship with you, either at the request of a competent state authority or on our own initiative, to protect and enforce our legal claims.

Legal basis for the processing of personal data:

- Processing is necessary to protect our legitimate interests

9. Internal and external audit

In order to ensure that we carry out our intermediary activities per the law and prevent damage, we conduct regular internal audits of our activities. In addition, we are required by the Accounting Act to have our accounts audited by an external auditor who may require access to certain personal data.

Legal basis for processing personal data:

- The processing is necessary to protect our legitimate interests

- The processing is necessary to comply with a legal obligation (according to Act No. 563/1991 Coll., on Accounting).

### **Categories of processed personal data**

We process the following categories of your personal data for the purposes mentioned above:

(a) Identification data, e.g. name, date of birth, birth number, nationality, signature, etc.,

(b) Contact data, e.g. address, telephone, e-mail, etc.,

(c) Economic and financial data,

- (d) Social, family and employment data, e.g. work, education, status, family, etc.,
- (e) Special categories of personal data: health, genetics,
- (g) Data about family members,
- (i) Data collected when you visit our website (<https://totalbrokers.cz/>),
- (j) Data relating to the use of our services,
- (k) Data obtained from public sources (public registers, land registry, trade register).

When arranging certain types of contracts (typically life insurance or health risk insurance - especially sickness and accident insurance), we need to know information about your health and/or genetic data to the extent necessary. This is data disclosed in connection with the conclusion of a life/accident insurance contract, i.e. in particular, health data contained in the relevant agreement and data disclosed in a health questionnaire. We process these data either based on your explicit consent or on the necessity for establishing, exercising, or defending legal claims.

### **Types of processors and recipients of personal data**

In some instances, other processors or recipients of personal data may be involved in the processing of your personal data, namely:

- (a) Our appointed agents and other representatives,
- (b) Business partners (insurance companies),
- (c) Public authorities (e.g. courts, administrative authorities),
- (d) External providers of professional and specialised services (e.g. legal or tax advisors),
- (e) External providers,
- (f) The Czech National Bank for the purpose of supervision of our company's activities pursuant to the Insurance and Reinsurance Distribution Act.

If we entrust the processing of your data to a data processor, this will always be done based on written data processing agreements in which the data processors are subject to strict obligations to protect and secure your personal data.

### **How we process personal data**

We process your personal data manually and automatically in electronic information systems per established security and procedural measures. All employees who come into contact with personal data are trained and bound by confidentiality obligations.

We process personal data for as long as the legal reason for processing it lasts, i.e. for the duration of the contractual relationship we have brokered and until the expiry of the relevant statute of limitations (extended by one year) relating to the rights arising from or in connection with that legal relationship, or for the period prescribed by law. In the event of judicial, administrative or other legal proceedings relating to our relationship with you or our activities for you or at your request, we will process your personal data for the duration of such proceedings. We process personal data for marketing purposes

until you withdraw your consent or object to the processing. We process personal data processed based on your consent for the period for which you have given your consent.

### **Automated decision-making in the processing of personal data**

There will be no automated decision-making in the processing of personal data.

### **Security of your personal information**

We are committed to ensuring the security of the personal information you provide to us. We have taken appropriate technical and organisational measures to protect your personal data as far as possible. No unauthorised person will have access to the personal data we have collected from you. We will not disclose your personal data to any third party for further processing without your consent unless required to do so by law, to comply with our contractual obligations or to protect our legitimate interests.

### **Right of access to personal information**

You have the right to ask us to tell you what personal data we are processing about you, to what extent and for what purpose. We will provide this information free of charge within 30 days of receiving your request and, in exceptional circumstances, within 90 days at the latest. In extraordinary circumstances, we will notify you in good time if the time limit is extended. When you request information we hold about you, we will first need to verify that you are the person to whom the information relates. Therefore, please provide sufficient identification of yourself in your request. If necessary, we have the right to request additional information to identify you before providing you with the personal information we hold about you. We then have the right to reasonably refuse requests for data that are unreasonable or unreasonably repetitive, require excessive effort, or would be difficult to obtain (typically from back-up systems, archives, etc.).

### **Right to data portability**

You have the right to obtain the personal data we hold about you in a structured, commonly used and machine-readable format. Upon your request, this data may be transferred to another controller. However, this right only applies to personal data that we process by automated means on the basis of your consent or on the basis of a contract concluded with you. Subject to the conditions set out in the previous sentence, you also have the right to have your personal data transferred directly from us to another controller where technically possible. The right to portability does not affect your right to have your personal data erased.

### **Updating of data, right to rectification of inaccurate personal data**

As personal information may change over time (e.g. a change of surname), we would appreciate it if you could inform us of any changes to your personal information so that we can keep it up to date and avoid any errors. Providing information about a change to your data is strictly necessary for us to properly carry out our activities as a data controller. This includes your right to have the personal information we hold about you corrected. If you believe our information is no longer current or accurate, you can request that it be corrected. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by providing an additional explanation.

### **Right to object to the processing**

You can object to such processing anytime if we process your personal data for our legitimate interests. You may object in writing to our registered office. If you make such an objection, we shall be entitled to continue the processing only if we can demonstrate compelling, legitimate grounds that override your interests or rights and freedoms and if the processing is necessary to establish, exercise, or defend our legal claims.

### **Right to restrict the processing**

You have the right to restrict the processing of your personal data if you believe that the personal data being processed is inaccurate (and for a while while we verify its accuracy) or if we are processing it unlawfully (but you refuse to have it deleted), and also if you believe that we no longer need the data to process it (but at the same time need the data for the establishment, exercise or defence of your legal claims). You also have the right to restrict the processing of your personal data if you have objected to it under the previous paragraph until it is verified that our legitimate grounds for processing outweigh your interests, rights and freedoms.

### **Right to erasure**

You have the right to have your personal data erased if the personal data processed is no longer necessary for the purpose for which it was collected and if the processing is based on consent. You revoke it if you object and there are no overriding legitimate grounds for further processing if your personal data has been processed unlawfully if we are required to erase it by law, or if the personal data was collected in connection with the provision of information society services under Article 8(1) of the GDPR. The right to erasure does not apply if processing your personal data is necessary to exercise the right to freedom of expression and information, for compliance with a legal obligation imposed by law or for the establishment, exercise or defence of legal claims.

### **Right to complain to a supervisory authority**

If you believe that the processing of your personal data violates data protection legislation, you have the right to file a complaint with the Office for Personal Data Protection, situated at Pplk. Sochora 27, 170 00 Prague 7, website: [www.uoou.cz](http://www.uoou.cz).

### **Website - log files**

When you visit and browse our website, we process and store the following log files on our servers. The information we store includes

- (a) Your IP address,
- (b) The page of our website that you access,
- (c) The http response code;
- (d) Your browser identification.

We process this information for a maximum period of one year and only for our legal protection.

### **Use of cookies**

To better evaluate the functioning of our website (<https://totalbrokers.cz/>) and to tailor some of our marketing activities, we use cookies on our website. Cookies are small text files stored locally on your

computer by your browser. Cookies enable us to distinguish between individual visitors to the website and personalise the website's content and also allow us to perform statistical analysis concerning visits to the website. Without your consent, we only process cookies necessary for the website's proper functioning and the basic setup of the available applications and modules. Other cookies are processed only based on your consent, which you can give directly on the relevant website for 12 months.

### **Sending news to your e-mail**

If you wish to receive product promotions from us by e-mail, and you provide us with your e-mail address and consent to the use of your e-mail address for such purposes, we will only process that e-mail for those purposes. We will not pass on the e-mail address obtained in this way to any other party. If, at any time in the future, you decide that you no longer wish to receive e-mails from us for this purpose, you may withdraw your consent by contacting us at the e-mail address below or by writing to us at our registered office.

### **Transfer of personal information to third countries**

We do not transfer personal data to processors or other recipients in third countries or international organisations. This privacy policy is reviewed and updated regularly.

### **Where you can contact us**

You can also contact us with your privacy questions at [info@totalbrokers.cz](mailto:info@totalbrokers.cz) or at our head office: Total Brokers a.s. Táborská 619/46, Nusle, 140 00 Prague 4.