

ERGO Privacy Policy

ERGO Life Insurance SE Latvian Branch

The goal of this privacy policy is to provide you as a client with information about the purpose, legal grounds and scope of the processing of personal data performed by ERGO, its possible recipients, security principles, processing periods, as well as data subject rights, and the identity and contact details of the data controller.

ERGO seeks to protect your privacy and personal data, complying with your right to the security of your personal data and the legality of their processing 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), the Personal Data Processing Law, and other laws and regulations that govern the fields of privacy and processing of personal data, as well as this Privacy Policy.

ERGO Privacy Policy covers data processing regardless of the form and/or environment you provide your personal data in (www.ergo.lv, the self-service portal www.mansergo.lv, in paper format, via e-mail, phone or mobile app) and in what systems or paper form they are processed.

ERGO takes the necessary technical and organisational measures to ensure the appropriate security of personal data, ensuring the protection of your personal data against accidental disclosure or modification, or other illegal processing of data.

Who is responsible for personal data processing?

The data controller is:

1. **ERGO Insurance SE**, registered in the Commercial Register of the Republic of Estonia under registration No. 10017013, registered office: A.H. Tammsaare tee 47, Tallinn, 11316, Estonia, represented in the Republic of Latvia by **ERGO Insurance SE Latvian Branch**, registered in the Commercial Register of the Register of Enterprises of the Republic of Latvia under No. 40103599913, registered office: Skanstes iela 50, Riga, LV-1013, and/or

2. **ERGO Life Insurance SE**, registered in the Commercial Register of the Republic of Lithuania under registration No. 110707135, registered office: Geležinio Vilko g.6A, Vilnius, LT-03507, Lithuania, represented in the Republic of Lithuania by ERGO Life Insurance SE Latvian Branch, registered in the Commercial Register of the Register of Enterprises of the Republic of Latvia under No. 40103336441, registered office: Skanstes iela 50, Riga, LV-1013 (hereinafter - ERGO).

In certain cases, ERGO Insurance SE and ERGO Life Insurance SE operate as joint data controllers, based on the legal grounds, goals and purposes specified in this policy, for example, to enable the performance of joint financial and administrative functions of ERGO, its human resources needs, business analysis and development, etc.

Contact details of ERGO for issues related to personal data processing:

The e-mail address for requests pertaining to the processing of personal data is personasdati@ergo.lv. The registered address of the company is: Skanstes iela 50, Riga, LV-1013

Using these contact details or coming to the registered office of ERGO with a personally signed, or an electronically signed (with a secure electronic signature) written submission, you may ask the ERGO data protection officer any questions regarding personal data processing. We will provide you with an answer within 30 calendar days after receiving the request, if we can identify you.

ERGO undertakes to process your personal data if any of the **legal grounds** for data processing listed below applies:

- your providing consent to ERGO;
- legitimate interest of ERGO;
- conclusion and fulfilment of a contract;
- compliance with laws and regulations to fulfil the duties that ERGO is required to perform in binding external regulations.

The **legitimate interests** of ERGO are:

- to perform business activities;
- to provide insurance services;
- to check your identity as a client before entering into a contract;
- to ensure the fulfilment of contractual obligations;
- to prevent unreasonable risks for its business (including conducting a risk assessment before providing services and during the fulfilment of the contract);
- to save your applications concerning the provision of its services, other applications and submissions, note about them, including the verbal ones made contacting the call centre, on the website and the self-service tool;
- to analyse the operation of the ERGO website, other websites, mobile apps, as well as visitor statistics, to develop and introduce improvements in them;
- to manage client accounts on ERGO websites, self-service sites and mobile applications;
- to engage in activities to maintain client loyalty;
- to segment the client database for better efficiency providing services and developing discount programmes customised to certain categories of clients, with the goal of promoting the client's trust of the company, and improving the effectiveness of communication;
- to develop and improve services;
- to advertise own services, to promote sales;
- to inform data subjects about the fulfilment of contracts, deadlines and other details important for contractual compliance;
- to inform of the quality of customer service, including customer surveys on services and their user experience (NPS);
- to prevent fraud and attempts at criminal offences;
- to investigate cases of possible fraud;

- to engage in corporate management, finance and business accounting and analytics;
- to engage in effective company management processes;
- to ensure service provision efficiency;
- to ensure and improve service quality;
- to effect and manage payments;
- to manage payments not carried out;
- to contact government authorities, law-enforcement agencies and courts to protect its legal interests;
- to inform the public about its activities;
- to conduct video surveillance on the premises of ERGO.

The purpose of personal data processing includes:

1. Provision of services for the purposes of:

- client identification;
- preparation and conclusion of contracts;
- fulfilment of contractual obligations;
- provisions and maintenance of the operation of services;
- improvement of services, development of new services;
- advertising and distribution of services, sales promotion or other business purposes;
- customer service;
- review and processing of complaints and objections;
- maintaining partnerships, promoting client loyalty, satisfaction studies;
- managing payments, including insurance proceeds;
- prevention and reduction of risk;
- credit risk assessment and management;
- maintenance and improvement of the operation of the website and mobile apps of ERGO;
- internal grouping of clients for awarding additional bonuses and discounts.

2. Business planning and analytics for:

- statistical analysis;
- business analysis;
- maintaining and improving business processes;
- business planning and accounting;
- determining and improving efficiency;
- ensuring data quality;
- conducting market and public opinion studies;
- preparing reports;
- conducting customer surveys to determine the quality of customer service and improve user experience in the field of insurance;
- prevention and investigation of criminal offences;
- risk management.

3. Other purposes:

- compliance with binding laws and regulations;
- audit and assurance of business compliance;
- provision of information to government authorities and law-enforcement agencies in the cases and in the amount prescribed in external regulations;
- special purposes, of which ERGO informs the data subject at the time when the data subject provides the corresponding personal data to ERGO.

What categories of personal data does ERGO process?

To provide you with an insurance service, ERGO will request your data (such as your name, surname, personal identity number, contact details, current account number, credit history, insured persons, beneficiaries, and, depending on the insurance product, other information as well, such as information about a vehicle, property, health, history of accidents etc.), in order to prepare the insurance proposal, to assess risks and to conclude the insurance contract. In order to provide you with an insurance service, ERGO obtains information from various registers, for example, the databases of the Road Traffic Safety Directorate, the Motor Insurers' Bureau of Latvia and AS 'Kredītinformācijas birojs'. Conclusion of the insurance contract is not possible without processing your data.

To assess the amount of damage and to decide on the procedure for paying insurance proceeds and their amount, ERGO will request and process your personal data (e.g., information about the circumstances of the insurance event, your health etc.).

In order to ensure compliance with the insurance contract, and to identify and register the evidence associated with insurance events, ERGO records the phone calls you make to the client call centre and certain other employees of ERGO. These phone call recordings are stored for no longer than what is required by applicable laws.

In order to **provide high-quality customer service and improve it**, ERGO records your conversations with the customer service call centre, or certain other employees of ERGO. Phone call recordings are stored for a period that is as brief as possible, except for situations when the conversation involves the conclusion of a contract, when criminal offences are identified in them, or if they are requested by law enforcement.

In order to prevent and/or detect criminal offences, to protect property and the vital interests of private individuals, ERGO conducts video surveillance of its premises, of which you are warned through notices informing you of video surveillance on the premises in question. These video recordings are stored for no more than 2 weeks, except for situations when criminal offences are identified in them, or if they are requested by law enforcement.

Whom does ERGO transfer your data to?

ERGO does not disclose any of your personal data, including confidential information about your insurance contract, to any third parties, unless it is necessary. Access to your data will only be available to those ERGO employees, who need it for the performance of their duties. However, in certain cases prescribed in applicable laws and regulations, and in the insurance contract, based on your consent or in accordance with the legitimate interests of ERGO, ERGO may transfer your personal data to the following parties:

- **Reinsurers:**
risks that ERGO undertake on your behalf are insured by special insurance companies: reinsurance companies. Reinsurers may need your insurance contract data, so that they can provide their reinsurance services.
- **Insurance agents, brokers, or intermediaries providing additional services:**
if you use the services of an insurance agent or broker, or additional-services intermediary to handle your insurance, these parties will process certain data necessary to conclude and fulfil the corresponding contract with ERGO. The insurance agent or broker provides this information to ERGO. ERGO also transfers personal data to its insurance agent or additional-services intermediary, to the extent that they need this information to provide you with the consultations and support you need in getting the insurance service.
- **Within ERGO group:**
Certain tasks performed within ERGO Group and pertaining to data processing may be performed in a centralised manner. If you are insured by one or multiple subsidiaries and/or branches of ERGO group, your personal data (except for special-category data) can be processed by another ERGO group subsidiary and/or group, in order to, for example, to provide insurance services, to provide customer service for marketing purposes, to fulfil contractual duties, or to jointly process correspondence.
- **Outsourced service providers:**
ERGO outsources certain services to external providers in order to fulfil its contractual and legal obligations, such as postal and courier service provider, vehicle workshops assessing vehicles and repairs in traffic accident cases, or experts to conduct expert reviews.
- **Business partners:**
ERGO may hand your personal data over to its partners associated with the provision of services to ERGO clients, such as medical institutions, pharmacies, sports clubs, opticians etc.
- **Financial service providers:**
ERGO may transfer your personal data (including your personal ID details) to the credit institution or finance lease company specified as the recipient of insurance proceeds in the insurance policy or handles the payment transaction as part of a specific insurance product, in order to confirm any payments made as part of insurance contracts, their validity, or provision of insurance services.
- **Other recipients:**
In certain cases, ERGO must transfer your personal data to parties such as government and municipal organisations and institutions, in order to fulfil a legal duty to notify. This includes, for example, the State Revenue Service, law-enforcement or supervisory agency (Financial and Capital Market Commission, Consumer Rights Protection Centre etc.); your personal data may also be provided to the Motor Insurers' Bureau of Latvia and AS 'Kredītinformācijas birojs'.

Does ERGO transfer your data to other countries outside of the European Union?

Your personal data are mainly processed within the European Union and the European Economic Area (EU/EEA).

However, please keep in mind that some service providers may be located outside the EU/EEA, meaning that ERGO may send personal data outside the EU/EEA (e.g., using the Google Analytics cookie service). In such cases, ERGO prefers to apply special personal data protection measures to ensure the security of your personal data. For example, if your personal data are sent to countries outside the EU/EEA, ERGO guarantees a sufficient level of security in using the available instruments for sending data, such as the EU GDPR clause on transfers on the basis of an adequacy decision, standard contractual clauses, binding company regulations, deviations or other tools and/or additional measures used in each specific instance of transferring personal data.

You have the right to review and obtain information about the transfer of your personal data outside the EU/EEA by contacting personasdati@ergo.lv, or submitting a written application to ERGO.

Does ERGO make automated decisions for individuals?

Automatic individual decisions are possible based on the information you provide about the insurance interest or risks, and in some cases, to calculate the price of OCTA mandatory vehicle insurance contracts. When calculating the insurance premium, the ERGO information system automatically analyses the insurance proceeds history of a person, their loyalty level as well as other aspects. You cannot refuse such automated activities, but you may contact ERGO and request to review the insurance offer received.

How does ERGO process your personal data for marketing purposes?

In order to send you advertising materials, discounts or other special offers based on your interests, which you have consented to, ERGO processes your name, surname, e-mail address, phone number, and the history of your use of the ERGO website.

We would like to inform you that your consent does not constitute the only grounds for ERGO sending you marketing messages. According to Section 9 Part 2 of the Law on Information Society Services, there are situations, in which marketing messages may be sent without consent, for example, if the e-mail address of the recipient was obtained as part of a previously received insurance service.

If you would like to refuse to receive such messages, you may do so at any time, by using the automatic cancellation option provided in the e-mail message, or by contacting ERGO via e-mail, at atteikums@ergo.lv, or switching the feature off in the www.mansergo.lv self-service portal.

How does ERGO process your personal data during social media campaigns?

Whenever you participate in contests organised by ERGO on social media (such as Facebook), you acknowledge as a contest participant that you provide us with your personal data (name, surname) available on the social media website, and that ERGO may use your personal data for the purposes of the contest, including contacting you, and identifying you as a winner and recipient of a prize, if necessary. We can also include your name and surname in a statement about the winner of the contest, which can be published on the social media accounts of ERGO.

ERGO does not take responsibility for any consequences of providing inaccurate data, or consequences that other contest participants may face if you provide us with information about any other private individuals as part of the competition. You as a contest participant take full responsibility for providing correct information, for its accuracy, confirming that to participate in the contest you only provide information that you have legal grounds to provide, and if you provide information about other private individuals, you confirm that those individuals do not object to you providing us with their personal data.

You as the data subject are entitled to revoke your consent and refuse to receive a prize, without any negative consequences. A contest participant revoking their consent is excluded from the contest. You may submit such a revocation using the contact details provided by ERGO.

Personal data collected as part of contests are stored for as long as is necessary for ERGO to manage the contest, to determine the winner, and to contact the winner for handing over the prize.

ERGO reserves the right to amend contest rules, publishing such amendments on its social media accounts, as part of publications associated with the contest.

Reminder about an incomplete purchase

Please be aware that if you do not finalise one of your purchases, ERGO will send you a technical support e-mail, website or phone message. This is necessary to confirm that you did not experience any technical problems when you were buying an ERGO service.

How does ERGO process the personal data of children?

ERGO mainly processes the data of children under 16 with the consent of their parents or legal guardians. Without their permission, ERGO only processes the data of children for certain, specially defined and restricted purposes (e.g., a minor may be specified as an insured person, or a recipient of insurance proceeds, even without the consent of a parent or guardian).

How long does ERGO store your data for?

ERGO stores your personal data for as long as necessary to achieve the above purposes of processing, unless longer periods are required or allowed by applicable laws and regulations. If the processing takes place based on your consent, then your data will be processed for as long as your consent is in effect and not revoked.

Having achieved the purpose of processing, ERGO will immediately delete or anonymise the corresponding personal data.

For example, ERGO will keep your data obtained to assess the insured risk, to conclude and fulfil the insurance contract, and to assess the circumstances of insurance events, during the insurance contract and for 10 more years after its expiry, in order to provide evidence that may be based on contractual obligations. If the contract is not concluded after receiving the insurance offer, ERGO stores your personal data for another 6 months and deletes them afterwards.

What are your rights as a data subject?

You have a right to:

- **revoke your consent** to the processing of your personal data at any time; however, your revocation of consent will not affect the legality of any data processing based on this consent prior to its revocation;
- **Object to the processing of your personal data for the purpose of advertising** by sending an e-mail application to atteikums@ergo.lv or unchecking that option in the self-service portal www.mansergo.lv.
- **access your personal data** and get information about how these data are processed;
- **request corrections** in your personal data if these are inaccurate, incomplete or false, or correct them yourself by logging in to your profile at www.mansergo.lv;
ERGO will delete your personal data at your request (e.g., if the processing is based on your consent, and you revoke it). However, this provision does not apply if ERGO processes the personal data, whose deletion you request, based on other legal grounds, such as the fulfilment of contractual or legal requirements;
- **request a copy of your personal data** in electronic format, with a right to transfer these data to another data controller (data portability);
- You have **a right to appeal to the Data State Inspectorate**.

If you would like to review your data or to rectify them, you may use the self-service portal www.mansergo.lv by contacting ERGO in writing using the address specified. At the same time, please know that if a data subject does not provide ERGO with relevant contact details, the data subject could fail to receive important information about the processing of their personal data.

Submission of complaints regarding the processing of your data

You may contact an ERGO data protection officer with a written submission to the registered office of ERGO or contact ERGO using the self-service portal www.mansergo.lv.

The authority that supervises ERGO with regard to personal data processing is the State Data Inspectorate; however, in any case we recommend you to contact us with your request first.

Information about the use of cookies

What are cookies?

Cookies are small text files stored on your computer or mobile device when you are visiting a website, and saved once you open the site. During each next visit the cookies are sent back to the website or to any other website recognising the cookies. Cookies are developed in a way so as to enable convenient use of the website and improve its functionality, facilitating the work of users and collecting information about how they use the website. Cookies do not pose any threat to the computer or the visitor of the website.

What are cookies used for?

ERGO uses cookies to make it more convenient for you to use the ERGO website, and to receive data and obtain insights that may be useful for ERGO in making sure that the website is developed and operates in a way that delivers you the best services possible. Cookies are used whenever you use the ERGO websites www.ergo.lv, online.ergo.lv, www.mansergo.lv.

ERGO uses cookies to ensure the technically correct operation of the website, to facilitate your use of the ERGO website, and to provide you with a personalised user experience. With your consent, ERGO uses cookies to provide you with personalised information about the products and services of ERGO that could be of interest to you, and to improve the operation of the ERGO website.

Description of cookies and what cookies do we use?

Essential cookies

Essential cookies are necessary so that you can freely visit and browse the website, obtain information about and buy services. These cookies identify your device, but do not disclose your identity. Without such cookies, the website would not be able to operate fully; for example, it would not be able to provide the information you need or the services you requested, or to log-in or service request functions. These cookies are stored on your device until you close your browser. These cookies are necessary for the operation of the ERGO website, and cannot be switched off. Thus, the legitimate interest of ERGO constitutes the legal grounds for processing these cookies (Article 6, Paragraph 1, (f) of the General Data Protection Regulation).

Functional cookies

Functional or target-audience selection cookies are used to identify the content that you prefer on the website of ERGO, and to provide you with best-suited information about ERGO's products and services, facilitate the adaptation of ERGO content, and to expand your activities on the website of ERGO. These cookies may be used on third-party websites, as part of ERGO advertising campaigns. They remain on the computer until they expire or when the user deletes them. If you reject the use of these cookies, you will be shown general, less personalised advertising. In this case, your consent constitutes the legal grounds for processing these cookies (Article 6, Paragraph 1, (a) of the General Data Protection Regulation).

Analytical cookies

Analytical cookies are an analysis tool used by the ERGO website, collecting data about the ways the website is used. They store information about the use of the website, identify the most frequently visited sections, including the content that you select when browsing the site. This information is used to analyse what the users of the site are interested in and to be able to improve the functionality of the site. These cookies are only used for the purpose of statistics, and they are not used for the identification of individual users.

In certain cases, a few of the analytical cookies are managed by third parties, or data processors (operators), on behalf of ERGO, such as Google, Vimeo, YouTube, Facebook, in accordance with the instructions of ERGO and only in compliance with the purposes indicated. In this case, your consent constitutes the legal grounds for processing these cookies (Article 6, Paragraph 1, (a) of the General Data Protection Regulation).

The cookie notification that opens when you visit the ERGO website provides more details about the cookies used by ERGO, the purposes of their processing and storage periods, making it possible for you to conveniently personalise your cookie choices.

How do I reject the use of cookies?

You can manage your cookies options in the 'Privacy Settings' section of the ERGO website, www.ergo.lv. You may also control, block and delete cookies from your device at any time, even if you initially agree to cookies being saved. You can configure most browsers to block the receipt of cookies by the device. This option is usually available in browser settings. When blocking the receipt of cookies you must adjust the settings manually each time you visit the website, and there is also a risk that some services and features might not work.

Revisions of the privacy policy

ERGO regularly revises and updates this policy. ERGO publishes the current version on its website, www.ergo.lv. The current version has been in effect since 31 January 2022.