

ERGO Privacy Notice

The purpose of this Privacy Notice is to provide to a natural person - a data subject or you as a Customer - information about the purpose, scope of personal data processing, protection of personal data and processing time during the acquisition of data and when processing the personal data of the data subject.

ERGO takes care of your privacy and personal data processing, obeys your rights regarding personal data protection and lawfulness of processing in accordance with the applicable legal acts: 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 (General Data Protection Regulation), regulatory enactments of the Republic of Latvia, this Privacy Notice and other data privacy and data processing related legal acts.

ERGO Privacy Notice shall refer to data processing regardless of the fact of what form and/or environment you provide personal data (www.ergo.lv, on the self-service portal www.mansergo.lv, in written form, electronically, via phone or mobile application) and in what systems or written form they are processed.

Who is responsible for personal data processing?

Controller of personal data processing:

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 Registration 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 Latvia by ERGO Life Insurance SE Latvian Branch, registered in the Commercial Register of the Register of Enterprises of the Republic of Latvia under registration No. 40103336441, registered office: Skanstes iela 50, Riga, LV-1013 (hereinafter - ERGO).

Contact information of ERGO on issues related to personal data processing:

personasdati@ergo.lv, registered office: Skanstes iela 50, Riga, LV-1013. By using these contacts or by turning to the registered office of ERGO with a written application, you may ask ERGO data protection officer any questions related to personal data processing. The supervisory authority of ERGO with regard to personal data processing is the State Data Inspectorate, however, in any case, firstly we recommend you to turn to us with your request.

What is the purpose and legal basis for personal data processing?

If you would like to receive an insurance service, ERGO will request and process your data (such as, name, surname, personal identity number, contact details, bank account number, information on insured persons and on beneficiaries and depending on the type of insurance service other information as well, such as information about a vehicle, property, health, history of accidents etc.), in order to create the insurance offer, to assess risks and to conclude the insurance agreement. Conclusion of the insurance agreement is not possible without processing your data.

ERGO will request and process your data (such as, information about circumstances of the insured event, health information etc) for the purpose of evaluation of the amount of loss and for taking decision on disbursement of the insurance indemnity.

In order to ensure high-quality customer service as well as administrate insurance contracts and keep the evidences, we will record your phone calls and conversations with the Customer Call Service Centre and other employees of ERGO.

ERGO carries out video surveillance and keeps the recorded videos for the purpose of prevention and / or detection of crime with respect to protection of property and protection of vital interests of persons, including life and health.

ERGO will process the personal data provided by you:

1. For the purpose of the provision of services:

- client identification;
- preparation and conclusion of contracts;
- fulfilment of contractual obligations;
- assurance and maintenance of services;
- improvement of services, development of new services;
- advertisement and distribution of information on services and products for commercial purposes;
- customer service;

- administration of complaints and objections;
- cooperation, increase in loyalty, satisfaction evaluation;
- tax and payment administration;
- risk assessment;
- maintenance of the webpage and mobile applications and their upgrade.

2. For the purpose of business planning and analytics:

- statistics and business analysis;
- planning and controlling;
- efficiency evaluation;
- data quality assurance;
- conduct of market and public opinion researches;
- preparation of the reports;
- performing of customer surveys;
- prevention and investigation of criminal offences;
- within the framework of risk management, audit, operation compliance activities.

3. For other purposes:

- provision of information to the state authorities and subjects of operational activities in cases and within the scope prescribed by external regulatory enactments;
- special purposes, in case of which we will inform you when you provide the relevant data to ERGO.

Personal data shall be processed predominantly on the following legal basis:

- conclusion and fulfilment of a contract - in order to conclude the contract after receipt of your application and ensure the fulfilment thereof;
- fulfilment of regulatory enactments - in order to fulfil the obligations set forth to ERGO by external regulatory enactments;
- in accordance with your, data subject, consent;
- for lawful (legitimate) interest - in order to implement the lawful (legitimate) liabilities of ERGO, arising from the existing liabilities between you and ERGO, the mutually concluded contract or law.

ERGO's legitimate (lawful) interests are:

- to perform commercial activities;
- to provide insurance services;
- to check your identity as a customer before entering into a contract;
- to ensure the fulfilment of contractual obligations;
- to prevent unreasonable financial risks for its commercial activity (including performance of risk assessment before service provision and during fulfilment of the contract);
- to save your applications for services, other applications and submissions, notices regarding them, including verbal ones, by calling the call centre, on the website and self-service environment;
- to analyse the operation of the ERGO website, online sites and mobile application, to develop and introduce improvements thereto;
- to administer the customer's account on ERGO websites, self-service sites and mobile application;
- to perform activities for the maintenance of customers;
- to segment the customer data base for the more efficient provision of services;
- to develop and improve services;
- to advertise its services by sending commercial notifications;
- to send other messages regarding the course of fulfilment of the contract and events significant for fulfilment of the contract, as well as to perform customer surveys about services and the usage experience thereof (NPS);
- to prevent fraud;
- to ensure corporate management, finance and business accounting and analytics;
- to ensure effective company management processes;
- to ensure service efficiency;
- to ensure and improve service quality;
- to administer payments;
- to administer non-performed payments;
- to turn to the state administration and operational activity authorities and court for the protection of its legal interests;
- to inform the society about its activities.

To whom does ERGO transfer your data?

ERGO shall not disclose confidential information about your insurance contract and personal data. Access to your data will only be available to those employees, who need it to perform working duties. However, in cases stipulated by law or by contract or on the basis of your consent or in accordance with the legitimate interest of ERGO, ERGO may provide information to the following persons:

- **Reinsurer:**
risks that ERGO undertake on behalf of you shall be insured by special insurance companies - reinsurance companies. Your insurance contract data may be necessary for reinsurers.
- **Insurance agent/broker or ancillary services intermediary:**
if you entrust insurance to the intermediary (insurance agent or broker) or to ancillary services intermediary, your insurance intermediary or your ancillary services intermediary will process the necessary data in order to conclude and fulfill the contract. The insurance agent or broker will transfer the information to ERGO. In turn, ERGO shall also transfer data to its insurance agent or ancillary services intermediary, to the extent they need the information in order to give you the necessary consultation and support for receipt of the insurance service.
- **For data processing within the ERGO group:**
Within the framework of ERGO group certain tasks, which are related to data processing, may be performed in a centralized manner. If you are insured by one or several of ERGO group companies and / or branches, your data (including health data) may also be processed by another ERGO group company and / or branch, for example, for provision of insurance service, for customer service with the purpose of marketing, common processing of contractual liabilities or mail correspondence.
- **To the outsourcing provider:**
ERGO works with certain outsourcing providers in order to fulfill contractual and legal liabilities of ERGO, such as post and courier services, car repair services or experts.
- **To the cooperation partners:**
ERGO may transfer your data to partners involved in provision of services to clients of ERGO, for example to medical treatment institutions, pharmacies, sport clubs, opticians.
- **To financial services providers:**
ERGO may disclose information about your insurance contract and its validity to a credit institution or leasing company if it is indicated as a beneficiary in the insurance policy.
- **Other recipients:**
ERGO may have an obligation to transfer your personal data to further recipients, such as state and local government units, in order to fulfill a legal obligation about notification, for example, to the State Revenue Service, law enforcement authorities, or supervisory authorities (Finance and Capital Markets Commission, Consumer Rights Protection Centre, etc) as well as Motor Insurers' Bureau of Latvia.

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

Your personal data generally are processed within the territory of the European Union and European Economic Area. If ERGO transfers your data to service providers outside of the European Union or European Economic Area, it will be performed in accordance with the regulatory enactments being in force in the European Union in the area of data protection.

Are automatic decisions possible in certain cases?

On the basis of the information provided by you about the risk, in certain cases, for example for the calculation of the price of MTPL contracts, automated decisions may be possible. When calculating the insurance premium, the ERGO system automatically analyses the insurance indemnity history of a person, loyalty level as well as other aspects. You cannot refuse such kind of automated activities, but you may contact ERGO and request to review the received insurance offer.

How long does ERGO store your data for?

ERGO will process your data for as long as is necessary to achieve the personal data processing purposes set out in the ERGO Privacy Policy.

The terms of retention of personal data are determined in accordance with the insurance contract concluded between ERGO and the client, and according to the requirements of legal enactments (for example, Personal Data Processing Law of the Republic of Latvia, Civil Law, laws preventing money laundering, etc.) and taking into consideration realization and protection of the legitimate interests of ERGO.

For example, ERGO will store your data, obtained for the purpose of evaluation of the insured risk and conclusion of the insurance contract, as well as for evaluation of the insured event) for the validity period of the insurance contract as well as 10 years after the termination thereof in order to ensure proof that may arise from liabilities of the contract.

In the case if the contract is not concluded after receipt of the insurance offer, ERGO shall store your personal data for another 18 months and shall delete them afterwards.

What are your rights?

You have the right:

- at any time to withdraw your consent for processing of your personal data; however, if you withdraw your consent it will not impact legality of consent-based processing of your data that was performed prior withdrawal of the consent;
- to object to the processing of your personal data for the purpose of advertising by sending reply e-mail to the address atteikums@ergo.lv or by making a mark in the self-service portal www.mansergo.lv.
- to receive information about the data that are being processed about you;
- to request the correction of your data if the data are incomplete or inaccurate;
- to demand that ERGO to deletes your data;
- ERGO ensures deletion of your personal data upon your request (for example, when the processing of data is based on your consent and you withdraw it). However, this condition will not apply if the data you are requesting to be deleted are processed by ERGO based on other legal grounds such as necessity to ensure compliance with contractual or regulatory requirements;
- to receive the data that you have submitted to ERGO and which relates directly to you and processing of which is based on your consent or on performance of the contract with you (right to data portability).

If you would like to display your data or to rectify it, you may use the self-service portal www.mansergo.lv, by contacting ERGO in written form using the specified address. If actual contact information will not be available to ERGO, you may not receive important notifications.

Submission of complaints regarding the processing of your data

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

Information about the use of cookies

What are cookies?

Cookies are small text files, which are stored on your computer or mobile device while visiting a webpage, when you open the site. During each next visit cookies are sent back to the home webpage or to any other webpage recognizing the cookies. Cookies are developed in a way so as to ensure convenient use of the website and improve the functionality thereof, facilitating the work of users and collecting information about how users use the website. Cookies do not create any threat to the computer of the visitor of the website.

What are cookies used for?

ERGO uses cookies in order to improve the convenience of you as a user of the ERGO website, as well as in order to receive data and obtain insight that may be useful for ERGO in order to make sure that the website is developed and operates in a way that you receive the best possible services. Cookies are used, when using ERGO websites www.ergo.lv, online.ergo.lv, www.mansergo.lv.

Description of cookies and what cookies do we use?

Mandatory cookies

These cookies are necessary in order for you to be able to freely visit and browse the website, obtain information about services and acquire them. These cookies identify you device, but they do not disclose your identity as well as they do not collect and gather information. Without such cookies the website will not be able to effectively operate, for example, provide information necessary for you to ensure the requested services or connection to the profile or application for a service. These cookies are stored on your device until the moment when the web browser is closed.

Functional cookies

Functional cookies are required in order for the site to remember the selected settings and selections made. They remain on the computer until the term of the cookie expires or when the user deletes it.

Analytical cookies

Analytical cookies are an analysis tool for use of the website, collecting data about the types of use of the website. They save information about the use of the website, establish the most frequently visited sections, including content that you select when browsing the site. Information is used in order to analyse what the users of the site are interested in and in order 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 persons - data processors (operators), such as Google, on behalf of ERGO, in accordance with the instructions of ERGO and only in compliance with the specified purposes.

Cookies used by ERGO:

__utma

This is a permanent cookie that remains on the computer until the term of the cookie expires or when the user deletes it. This cookie registers the first visit (unique visit) and the last visit (unique visit). It also includes information, enabling one to monitor the days when purchases are made and the number of visits, as well as analyse activities of the customer during various stages of the purchase.

__utmb, __utm

They operate in pairs, providing an opportunity to calculate the duration of the visit. **__utmb** registers the precise time when the visitor enters the website, but **__utm** - the time when leaving the site. The term of **__utmb** expires at the end of session, i.e., when the user leaves the site. The term of **__utm** expires after 30 minutes if no new views on ergo.

	lv pages are registered during this period of time.
__utmz	It shows where the user has entered the site from (locator, link from other site, when entering the address in the web browser etc.). In addition to this the cookie registers the keyword that the user has entered in the browser before entering the website www.ergo.lv , as well as the approximate place of location of the user, which is determined on the basis of the IP address of the user. This cookie operates for six months.
__utmv	It is used for the distribution of users by segments.
site_user	It stores information about the country, which is determined on the basis of the IP address of the user as well as the language used by the user during the last visit.
_dc_gtm_UA-3521369-2	This is a cookie of the Google Tag Manager solution, which is used for the management of different scripts (automatic webpage programs).
_ga sīkdatne	It is used for the identification of users. This cookie operates for two years.

How do I refuse the use of cookies?

You may control, block and delete cookies from your device at any time, even if you agree to cookies being saved at the beginning. You may set the majority of browsers in a way that the receipt of cookies on the device is blocked. This option is usually available in the section of settings of browsers. When blocking the receipt of cookies you will need to adjust the settings manually each time you visit the website, and there is also a risk that some services and features might not work.

Review of the Privacy Notice

ERGO will regularly review and update this Privacy Notice. ERGO will publish the updated version on the website www.ergo.lv. The updated version was developed on 15.01.2020.

This document is a translation from Latvian version of the Privacy Notice and has informative nature. In case of contradictions, the Privacy Notice text in Latvian shall prevail.