

ERGO PRIVACY POLICY

1. Goal of the Privacy policy

The goal of the Privacy policy is to provide you as a client with information about the purpose, legal grounds and scope of the personal data processing performed by ERGO, its possible recipients of personal data, data security principles and 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 personal data processing 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 personal data processing, as well as this Privacy policy.

ERGO Privacy policy covers data processing regardless of the form and/or environment in which you provide your personal data, for example, 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, which, according to the laws and regulations, ensures the protection of your personal data against accidental disclosure or modification, or other illegal processing of data. ERGO takes a number of measures to ensure the security of personal data, for example, the training of persons involved in personal data processing, security risk assessment and monitoring, management and control of access rights, etc.

If you provide us with data about other persons as part of your cooperation, for example, if you represent other persons, you are obliged to make those persons aware of this Privacy policy.

2. 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: Veskiposti 2/1, Tallinn, 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, e-mail info@ergo.lv and/or

(2) **ERGO Life Insurance SE**, registered in the Commercial Register of the Republic of Lithuania under registration No. 110707135, registered address: 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, e-mail info@ergo.lv (hereinafter – ERGO).

ERGO Insurance SE and ERGO Life Insurance SE act as separate independent controllers. 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, human resources needs, business analysis and development, marketing, security, etc. ERGO Insurance SE and ERGO Life Insurance SE ensure the processing of your personal data in accordance with applicable laws and regulations, including with respect to the exercise of the rights of data subjects, and the implementation of technical and organisational security measures, etc. You can exercise your rights in relation to each and against each of the controllers. For easier communication, please contact the contact point – the ERGO company/branch with which you have a contract or other form of cooperation.

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

- The e-mail address for requests pertaining to the personal data processing and for contacting the ERGO data protection officer is personasdati@ergo.lv.
- registered office: Skanstes 50, Riga, LV-1013, Latvia.

Using the e-mail of these contact details or coming to the registered office of ERGO with a written submission that is personally signed, or electronically signed with a secure electronic signature, you may ask any questions

regarding your personal data processing. We will respond to you without undue delay and in any event within one month of receiving the request, if we are able to identify you to the extent necessary within the scope of the request.

Mainly, ERGO processes your personal data if any of the **legal grounds for data processing listed below apply**:

- Consent provided by you – when processing personal data on the basis of consent, ERGO will inform you of the goal of the specific data processing before you provide it, and you may withdraw your consent at any time;
- legitimate interests – to pursue the legitimate interests of ERGO or a third party (only where the interests or fundamental rights and freedoms of data subjects are not overridden, taking the reasonable expectations of data subjects into account);
- conclusion and fulfilment of the contract – for example, to enter into, amend, maintain, perform, and terminate a contract you have entered into with ERGO, or to take action at your request prior to entering into such 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 take the necessary steps to ensure the fulfilment of the contractual obligations, for example, the enforcement of debt obligations, legal proceedings, etc.;
- to prevent unreasonable risks for its business, including conducting a risk rating before providing services and during the fulfilment of the contract;
- to save your applications concerning the provision of the services for as long as necessary, other applications and submissions, notes about them, including the verbal ones made when contacting the call centre, on the website and using 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 provide clients with useful cooperation information by e-mail or other means of communication, such as information on important news and changes in the range of services, service channels, opening hours and address changes (subject to the procedures and conditions set out in the laws and regulations);
- to inform of the quality of client service, including client 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, analytics, statistics, and market research;
- 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 and law enforcement agencies and courts to protect its legal interests;
- to inform the public about its activities;
- to take security measures, including video surveillance on ERGO premises.

4. The purpose of personal data processing:

(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 ERGO website and mobile applications to ensure the efficient and convenient provision of services, information exchange and communication with the client;
- 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 the requirements of binding laws and regulations, including to ensure compliance with laws and regulations and/or instructions of supervisory authorities, for example, insurance and reinsurance laws and regulations; insurance contract laws and regulations, accounting laws and regulations, anti-money laundering and anti-terrorism and anti-proliferation financing laws and regulations, international and Latvian national sanctions laws and regulations, whistleblowing laws and regulations, Foreign Account Tax Compliance Act (FATCA) and Common Reporting Standard (CRS) regulations, European Union Solvency II regulations, etc.;
- audit, assurance of business compliance and risk management purposes;
- 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.

5. What categories of personal data does ERGO process?

In order to receive the insurance service, ERGO will request and process your personal data (for example, identification data, including name, surname, personal identity number, contact details, including address, e-mail, telephone; credit information where applicable, for example, in the case of deferred or shared payment; financial data, including current account number; policyholder information, insured persons, beneficiaries and, depending on the insurance product, other information, such as information about the objects of insurance, for example, vehicle, property, health, accident history; personal data required to be processed in accordance with laws and regulations; communication data within the framework of communication with ERGO; etc., to prepare an insurance offer, assess risks and conclude an insurance contract.

The conclusion of an insurance contract and related activities are not possible without personal data processing. Personal data processing is a prerequisite for processing your request, including the conclusion of the insurance contract and other matters related to your specific situation. If you refuse to provide personal data, your individual enquiry will not be dealt with.

To assess the amount of damage and to decide on the procedure for paying insurance proceeds and their amount, ERGO will request and process other personal data about you (for example, 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 (incoming, outgoing calls). Such recordings shall be kept for no longer than is necessary for the purpose and in accordance with applicable laws and regulations.

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 (incoming, outgoing calls).. 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 or it is necessary for the protection of legitimate interests or the fulfilment of laws and regulations, for example, when requested by law enforcement agencies, or if criminal offences are identified.

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. Video recordings are stored for a period of no more than 2 weeks, except in cases when it is necessary for the fulfilment of laws and regulations or the protection of legitimate interests, for example, when requested by law enforcement agencies or if criminal offences are identified.

6. Where does ERGO obtain personal data?

ERGO mainly receives personal data from clients themselves, for example, when a client applies for an insurance contract or claims proceeds.

In appropriate cases, for example, to assess insurance risk, calculate premiums, prepare an insurance offer, conclude or renew an insurance contract, investigate insurance-related circumstances, determine the amount of insurance proceeds, etc., ERGO may receive and collect your personal data from other sources, such as:

- personal data provided to ERGO by another person, such as a policyholder for the insured, for example, to obtain an insurance offer, conclude a contract, receive the indemnification of losses, and communicate with ERGO;
- an authorised or legal representative of the data subject;
- insurance intermediaries, including insurance agents or brokers, and insurance intermediaries for ancillary services;
- reinsurance partners and proceeds administration partners;
- personal data obtained through the use of ERGO services, for example, call recordings, emails;
- public and private databases, such as the Register of Enterprises, the Road Traffic Safety Directorate (CSDD), the Latvian Motor Insurers' Bureau, and JSC "Kredītinformācijas birojs";
- public sources, including official statements;
- state and local authorities, law enforcement agencies;
- healthcare providers, pharmacies, independent experts, managers of residential houses, service providers related to the insured object, the insurer or any other third party to whom ERGO is obliged to provide personal data or which provides access to personal data at the request of ERGO, if access to personal data is necessary for the performance and enforcement of the insurance contract, or for the submission of claims for recovery;
- banks and other payment institutions;
- the data subject's employer, for example, when purchasing an insurance policy;
- ERGO group companies and branches;
- other third parties where there are legal grounds to do so, for example, in cases provided for in the laws and regulations, etc.

7. 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 accordance with the requirements of the laws and regulations or in the cases provided for in the contract, or based on your consent, or in accordance with the legitimate interests of ERGO, ERGO may transfer your personal data to other parties, for example,

personal data may be disclosed to third parties if it is necessary for the conclusion of an insurance contract or for the performance of an insurance contract with you as a client, as provided for by the laws and regulations, or for other lawful reasons. Information may also be provided to other parties at your request or in accordance with your contractual obligations to other parties. Personal data may be transferred, for example:

- **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.

If your application relates to a field of activity that affects several ERGO group companies and/or branches, the ERGO group companies and/or branches may cooperate with each other to deal with the matter applied for.

- **Service providers:**

We may provide your personal data to our affiliated service providers (processors) who provide services to us (perform work) and process your personal data on behalf and in the interests of ERGO as the controller. The affiliated service providers only have the right to process personal data in accordance with our instructions, and only to the extent necessary for the proper performance of our obligations. ERGO only uses service providers that provide sufficient assurance that appropriate technical and organisational measures will be put in place. For example, we may work with service providers who support us in our dealings with our clients and provide various information technology services, for example, system development and maintenance services, information retrieval services, website/mobile application development and maintenance services, cloud services, technical solutions based on image recognition, such as the assessment of data of the insured object, etc.

ERGO can also cooperate with other service providers in order to implement the legitimate interests of ERGO, fulfil the contractual and legal obligations of ERGO, for example, as a postal and courier service provider, vehicle workshops assessing vehicles and repairs in traffic accident cases, or experts to conduct expert reviews, as well as external consultants, for example, law firms or other independent consultants, etc. Such service providers may also act as independent controllers in their own right, in accordance with the regulatory framework applicable to them.

- **Cooperation partners:**

ERGO may hand your personal data over to its partners associated with the provision of services to ERGO clients, for example, medical institutions, pharmacies, sports clubs, opticians, equipment service providers, 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 the 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, for example, the Bank of Latvia, the Consumer Rights Protection Centre, etc.; your personal data, according to the type of transaction, may also be provided to, for example, the Motor Insurers' Bureau of Latvia, or AS 'Kredītinformācijas birojs'.

8. 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).

At the same time, please note that some service providers may be located outside the EU/EEA; therefore, your personal data may be processed outside the EU/EEA. 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.

9. Does ERGO make automated decisions for individuals and profiling?

Based on the information you provide about the insurance object or risk, profiling and/or automated individual decisions may be made in certain cases, for example, to advise the client, assess risks, calculate payments, prepare and make offers, prepare and process applications, and implement other decisions, for example, to manage risks and control transactions in the fight against fraud. Profiling is the processing of personal data for the purpose of assessing the risks and personal characteristics of a client, including creditworthiness and the use of existing services, in order to analyse or predict the risks, insurance needs, preferences and interests of a client, and to provide relevant services. A decision based on automated processing is taken using information technology. When calculating the insurance premium, ERGO information systems may automatically analyse information collected from available sources about the data subject and about the insured property, for example, the person's insurance proceeds history, loyalty level, place of residence, age, credit rating, etc.; the vehicle or building information, vehicle manufacturer, repair data, as well as other aspects. This information may affect, for example, the availability of the service and/or the amount of the premium, depending on the type of insurance. For example, the better the aggregated information, the better the insurance premium can be set, and vice versa.

For example, we may use technological solutions that enable you to take and provide us with, for example, photographs of the insured object and location information (if you choose to provide it to us), which may be analysed in an automated manner to enable us to assess insurance risks, identify defects in the insured object, and/or process insurance proceeds. Automated decision-making, including profiling, helps to ensure that our decisions are made quickly and fairly in accordance with the information we hold. ERGO ensures that the assessment methods used are regularly reviewed to ensure their fairness, accuracy and objectivity. You have the right to contact ERGO and request that specialists of ERGO review a decision, for example, on an insurance quote you have received, which is based solely on automated processing, including profiling.

Automated decision-making may not be available if there are circumstances that are not specific to standard insurance risks. In this case, an individual risk assessment may be carried out immediately, which may take additional time.

10. 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 may process, for example, your name, surname, e-mail address, phone number, information about the services provided to you, etc.

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.

You can opt out of receiving such messages at any time, for example, by using the self-service portal www.mansergo.lv, by sending an e-mail to atteikums@ergo.lv, by calling the customer support line on 22585500, or by contacting the ERGO customer service points.

11. 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 (for example, 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 a 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 comply with the requirements of the laws and regulations, 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.

12. Reminder about an incomplete purchase

Please be aware that if you do not finalise one of your purchases, ERGO can 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.

13. How does ERGO process the personal data of children?

ERGO mainly processes the data of children, mainly 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 (for example, a minor may be specified as an insured person, or a recipient of insurance proceeds, even without the consent of a parent or guardian) and to the extent required by the law, for example, in relation to access to information society services.

14. 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.

ERGO only retains personal data that is objectively necessary for ERGO, for example, to comply with its obligations under laws and regulations; to protect the legitimate rights of ERGO; and to fulfil the obligations of ERGO.

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 up to 10 years thereafter, unless otherwise provided by law or regulations, in order to provide evidence that may be based on contractual obligations. Personal data relating to requests from the data subject may be kept for up to 5 years.

After reaching the goal, ERGO will immediately take steps to erase the personal data concerned or to anonymise or securely destroy it if it is in paper format. Depending on the volume and type of data, this may take some time to complete technically. We ensure personal data protection throughout its lifecycle.

15. 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 personal data processing for promotional purposes**, for example, by using the self-service portal www.mansergo.lv, by sending an e-mail to atteikums@ergo.lv, by calling the customer support line 22585500, or by contacting the ERGO customer service points;
- **access your personal data** and get information about their processing (right of access by the data subject);
- **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 (right to rectification);
- request ERGO **to delete your personal data** ('right to be forgotten') or restrict their processing (right to erasure):

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;

- exercise **your right to the restriction of processing** where the circumstances provided for in the laws and regulations exist (right to the restriction of processing);
- **request a copy of your personal data** in electronic format and the right to transfer this data to another controller, insofar as this is provided for by the laws and regulations and where this is technically feasible (right to data portability);
- object, on grounds relating to your particular situation, **to the processing of your personal data based on legitimate interest** or on official authority vested in the controller (right to object);
- **request a review of an automated decision on an individual basis** with the assistance of ERGO specialists (automated individual decision-making, including profiling);
- 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.

16. Submission of complaints regarding the processing of your data

If you have any questions, please first contact ERGO with your request. You have the option to submit an application to the ERGO registered office, contact ERGO, using the self-service portal www.mansergo.lv, or write to the ERGO data protection officer at personasdati@ergo.lv.

If no solution can be found, you have the right to contact the ERGO supervisory authority for personal data protection, the Data State Inspectorate (<https://www.dvi.gov.lv>). In the cases provided for by the legislation, you also have the right to apply to the courts if the actions referred to in the data subject's request are not carried out.

17. Information about the use of cookies

We may use cookies or similar technologies, which are small files sent from a website and stored on a user's web browser, mobile phone or other device. This data is stored on the user's device and may be used to remember information about the user's visit to the website, to provide a personalised user experience and to enable the use of certain features of web pages, as well as for other purposes, such as advertising. For example, if you have chosen to consent to cookies on our website for marketing purposes, we may use information about your visit history on the ERGO website.

For more information on the use of cookies, please see our Cookie policy, available on our website.

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

18. Availability and revision of the Privacy policy

ERGO regularly revises and updates this Privacy policy. ERGO publishes the current version on its website, www.ergo.lv.

If this Privacy policy is translated into other languages, the Latvian language text shall prevail in the case of conflict.

Current version of the Privacy policy: 15.10.2025