



Informative notice regarding the processing of personal data

The insurance company under the name "GROUPAMA PHOENIX HELLENIC INSURANCE COMPANY S.A." (hereinafter "Groupama Asfalistiki") is a Greek insurance company with the purpose of insurance and reinsurance.

We hereby inform you that Groupama Asfalistiki will archive and process your personal data. For data characterized as specific categories – sensitive data, such as i.e. your health data, your explicit consent for processing will be obtained. The processing of your personal data consists in collecting, registering, organizing, structuring, storing, adapting, altering, retrieving, searching for information, disclosure, transmission, dissemination or any other form of dispatching, association, combination, limitation, deletion or destruction. The maintenance and processing of the personal data archive falls within the scope of EU Regulation 679/2016 as well as other Regulations and Laws that each time apply to the protection of individuals from the processing of personal data and is carried out in accordance with the terms and provisions of the relevant Regulations and Laws.

Groupama Asfalistiki collects your personal data included in your insurance application, its accompanying and supporting documents and any other data that you personally have disclosed or will disclose to Groupama Asfalistiki in the future, either orally or by any other means, through its employees or its affiliated insurance intermediaries.

In addition, Groupama Asfalistiki may request and collect, for the fulfilment of the processing purposes set forth below, your data from third parties, whether co-operating or not with Groupama Asfalistiki, and in particular from service providers, surveyors, health programs' support and management companies, doctors, public or judicial authorities.

The processing of your data by Groupama Asfalistiki includes, indicatively, the following categories:

- a.** Identification data: First name, last name, date of birth, identity card / passport number, Social Security Number, Tax Identification Number.
- b.** Communication Data: E-mail / Mail Address, Phone / Fax Numbers
- c.** Payment Details: Bank accounts, debit / credit and other bank cards
- d.** Insurance data: Data necessary for the conclusion and management of the insurance contract (e.g. regarding the economic / financial status, investment / savings targets, health data)
- e.** Settlement Data: data necessary for the handling of insurance claims, included in the application for compensation / redemption / payment of the insurance indemnity or in accompanying / supporting documentation or any other data related to it.
- f.** Amicable Settlement Data: data of third-party data subjects, insured with another insurance company participating in the Amicable Settlement system for car insurance, which may be transmitted by these insurance companies and processed by Groupama Insurance within the framework of the Amicable Settlement.

Groupama Asfalistiki's identity and contact details:

You can contact Groupama Asfalistiki in order to be informed about the maintenance, processing and rights of yours at the following addresses and telephone numbers:

Groupama Phoenix SA, Nea Smyrni, Attica, 213-215 Syggrou Avenue and Charioupoleos – Postal code 17121, tel.: 2103295111, fax: 2103239135, e-mail: info@groupama.gr, website: www.groupama.gr

Contact details of the Data Protection Officer:

You can contact the Data Protection Officer at the Headquarters of Groupama Asfalistiki, by tel: 210 329 5427, fax: 210 329 5634, or e-mail: dataprivacy@groupama.gr

Purpose of processing

The purpose and legal basis of the processing of personal data is the support, promotion and execution of our transactional relationship, the compliance of Groupama Asfalistiki with obligations imposed by the applicable legal and regulatory framework, the avoidance of insurance fraud and the research Groupama Asfalistiki may carry out in relation to other, past or future, applications for insurance. In addition, your personal data may be used for statistical purposes, i.e. for conducting statistical surveys or producing statistical conclusions or conducting customer satisfaction surveys, as well as for commercial purposes, upon your consent, namely the promotion of products or services, advertising etc.

Automated processing

Additionally, your personal data may be subject to automated processing required for the conclusion or execution of your insurance policy and, in particular for the assessment of risk and / or your investment profile and the decision - making by Groupama Asfalistiki with regard to the requested insurance. These automated processes are based on mathematical / statistical analyses of the critical parameters related to the insurance that enable the objective assessment of risk and its integration into a homogeneous risk group on the basis of the frequency and severity of the losses it may cause, as well as its correct pricing. In case you object or question any element of the result stemming from the above processing, you are entitled to oppose to it by requesting that this result or element be reviewed by the competent department of Groupama Asfalistiki (e-mail: lifemodifications@groupama.gr / tel. 2103295111). You can

also contact Groupama Asfalistiki for clarifications / explanations or to express your opinion on the outcome.

Furthermore, Groupama Asfalistiki may use automated procedures during the term of the insurance policy in order to conduct controls for purposes of avoiding money laundering and terrorist financing, insurance fraud and complying with the overall legislation on the automatic exchange of information on financial accounts.

Personal data of minors

Groupama Asfalistiki does not seek or deliberately collect personal data from individuals under the age of 15 (or any age limit each time set by Greek law), nor is the content of its website addressed to people of those ages. If Groupama Asfalistiki discovers that it has accidentally collected personal data from minors, it will erase their personal data as soon as reasonably possible.

However, Groupama Asfalistiki may collect personal data of minors under fifteen (15) years of age directly from parents or their commissioners, with their explicit consent, and with a view to supporting, promoting and executing the transactional relationship. Groupama Asfalistiki encourages parents and guardians to assume an active role in the online presence and activity of their children.

Criteria defining the length of time for which personal data will be stored

Personal data are stored for as long as needed for the execution of our transactional relationship. Criteria for determining the time length that your personal data will be stored are the legal obligations of Groupama Asfalistiki, the need to safeguard the interests of those transacting with Groupama Asfalistiki and the interests of Groupama Asfalistiki itself.

Groupama Asfalistiki will collect, store and in general process your data for up to twenty (20) years from the termination by any means of the insurance policy and up to five (5) years if the policy is not concluded, unless a court dispute is pending beyond the above processing timeframes and until it has been resolved by irrevocable judicial decision.

Transfer of personal data

Your data may be transferred:

- a. to other (re)insurance companies upon their request, if this is based on a legal argument establishing its validity,
- b. to the parent company or to another company within the EU, which belongs to the same Group as Groupama Asfalistiki. This kind of transfer does not concern data of specific categories,
- c. to public / judicial authorities,
- d. for car insurance, to the Statistics Office of Insurance Companies (Y.Σ.A.E.),
- e. where appropriate, to providers/partners of Groupama Asfalistiki in the framework of the lawful operation of the insurance policy, such as cooperating insurance intermediaries, insurance works' control and management companies, health programs' support and management companies, archiving companies, call centers, lawyers, investigators or surveyors, public or judicial authorities.
- f. in the event of an Amicable Settlement for damage, in car insurance, to the insurance company that insures the other vehicle, provided that it participates in the Amicable Settlement system (<https://www.eaee.gr/wp-content/uploads/2026/02/%CE%A0%CE%B1%CF%81%CE%AC%CF%81%CF%84%CE%B7%CE%BC%CE%B1-7.pdf>), which then becomes a new Data Controller of your data and vice versa, the personal data of third-party data subjects, insured with another insurance company, may be transferred and processed by Groupama Insurance, in the context of Amicable Settlement, which will subsequently become their new Data Controller.

Your rights as data subject

As a data subject, you retain all the rights provided by EU Regulation 679/2016, as well as other Regulations and Laws that each time apply to the protection of individuals from the processing of personal data.

Indicatively, you have the following rights:

- 1) the right to rectification of inaccurate personal data concerning you
- 2) the right to erasure of your personal data ("right to be forgotten"),
- 3) the right to restriction of processing of your personal data,
- 4) the right of notification regarding rectification or erasure or restriction of the processing of your data,
- 5) the right to object at any moment to the processing of personal data,
- 6) the right to receive your personal data in a structured, commonly used and machine-readable format, as well as the right to transmit those data to another data controller (data portability),
- 7) the right to access the personal data that Groupama Asfalistiki possesses and to receipt of information for all data concerning you, as well as their origin, purposes of processing, recipients or categories of recipients and the evolution of the processing since the last update.

You may exercise the aforementioned rights upon submission of a specific written request, which you will address by e-mail to dataprivacy@groupama.gr or by postal letter to the premises of Groupama Asfalistiki in Nea Smyrni, Attica, Sygrou 213-215 and Charioupoleos, Postal code 17121.

Right to withdraw consent – Consequences of not granting or withdrawing consent

You have the right to withdraw your consents at any time or to object to a specific processing, in the same way that you can exercise your rights as data subject (by e-mail to dataprivacy@groupama.gr or by postal letter to the premises of Groupama Asfalistiki). Minors under the age of 15 (or any age limit each time set by Greek law) can exercise all of their rights, including withdrawal of consent, through their parents or their commissioners.

In cases of requests for copies of personal data where the reproduction cost is high and exceeds reasonable or expected limits, you may be charged a reasonable fee to cover administrative expenses. Specifically, in cases where you are required to undergo medical examinations (e.g., pre-insurance checkups) and you wish to receive the results, you may be charged for the cost of the examinations.

However, we would like to draw your attention to the fact that in case you withdraw or do not give your consent or object to the processing of data which is absolutely necessary for the execution of the insurance contract, such as i.e. health data in case of life and health insurance, Groupama Asfalistiki will not be able to fulfill its contractual obligations. If the withdrawal of such consent, or its non-provision or opposition, occurs at the pre-contractual stage, Groupama Asfalistiki has the right to refuse to conclude the contract.

Complaint

As a data subject, you have the right to lodge a complaint with the Personal Data Protection Authority (1-3 Kifissias Avenue, postal code 11523, Athens, tel.: 2106475600, fax: 2106475628, www.dpa.gr), if you consider that the processing of your personal data is in breach of European Regulation 679/2016 or any other applicable Personal Data Protection Law.

DECLARATION OF CONSENT

Pursuant to the above information, I explicitly declare that I consent to:

- ☐ The processing of my personal health data
- ☐ The processing of my personal data for commercial purposes, such as promotion of products or services, advertising, etc.

The consenting to the processing	The consenting to the processing
Date	Date
Name & Surname	Name & Surname
Tax ID	Tax ID
Signature	Signature

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Signature	Signature