

## 1. Assicurazioni Generali processes your personal data

**Assicurazioni Generali S.p.A.** (hereinafter also the “**Company**”), with registered office in Trieste, at Piazza Duca Degli Abruzzi no. 2, processes your personal data as data controller.

If you wish to receive more information, you can use the following postal address: Assicurazioni Generali S.p.A., Piazza Duca degli Abruzzi no. 2, 34132 Trieste / P.O. Box 538.

For any questions or if you wish to exercise a right in respect of the processing of your personal data, you can contact our data protection officer by email at: [dpoag@generali.com](mailto:dpoag@generali.com); by traditional mail at: Assicurazioni Generali, Piazza Tre Torri n. 1, 20145 Milan to the attention of the data protection officer.

## 2. How we use your personal data and on the basis of which ground

We process your personal data within the Generali Global Corporate and Commercial Multinational Programs, global insurance composite solutions.

The Company processes your personal data (as described in more detail under paragraph 4) for the following purposes:

- 1) to organize, perform and manage the Generali Group Multinational Network, that includes, e.g., creation of contact book, awareness, communication and training initiatives, etc.;
- 2) to perform reporting, statistic and data analytics activities, also in aggregate form, in the context of the activities carried out during the network management;
- 3) to fulfil applicable legal obligations;
- 4) to claim and defend the rights of the Company, its officers, representatives and shareholders in a potential dispute.

## 3. Where and why the provision of your personal data is required

The processing of your personal data for the purpose (1), (2) and (4) is based on the legitimate interest pursued by the Company. In particular, for purpose (1) and (2) the legitimate interest of the Company is to properly manage Generali Group Multinational Network, to improve its expertise and efficiency; for purpose (4) to defend the rights of the Company, its officers, representatives and shareholders in a potential dispute. Should you oppose said processing as explained in paragraph 7 below, your personal data may not be used for the above-mentioned purposes, unless the Company proves the existence of compelling legitimate reasons to proceed with the processing, that prevail over the interests, rights and freedoms of the data subjects or for the determination, exercise or defence of a right in court.

The processing of your personal data for purpose (3) is mandatory as it is necessary for the Company to comply with its legal obligations.

## 4. Which personal data we use

We process only the personal data strictly necessary to achieve the purposes above. We mainly process:

- identification data (such as name and surname);
- contact data (such as email address and phone number),

provided us by the Fronting Office part of the Generali Group Multinational Network you work for, in addition to any other personal data provided by you, if any.

## 5. How and with whom we share your personal data

Our staff processes your personal data with modalities and procedures, also in electronic form, appropriate to ensure an adequate level of security which, insofar as applicable, may be set forth in the audio/video release form you have signed. Your personal data can be shared only with third party which have been assigned with the task to perform some activities concerning the management of the relationship with the Company. Both our staff and third parties which process your personal data for the purposes above indicated – exception for autonomous Data Controllers – receive proper instructions about the correct modalities of the processing. Furthermore, insofar as applicable, your personal data may be shared with other companies belonging to the Generali group.

To develop Multinational Programs, Generali Group Companies involved act as autonomous data controller.

## **6. To whom and where we transfer your personal data**

As a general rule, we do not transfer your personal data in Countries outside the European Economic Area.

In exceptional cases, limitedly for the purposes indicated under paragraph 2 above, we may transfer your personal data to where the above-listed recipients may be based. In any case, the transfer of your personal data is performed in compliance with the applicable laws and international agreements in force, as well as on the basis of appropriate and suitable safeguards (such as, for example, transfer to a Country ensuring an adequate level of protection or adopting the standard contractual clauses approved by the EU Commission). Where required by the applicable laws, the Company will implement any supplementary measure as required by applicable laws.

## **7. The rights you can exercise in respect of the processing of your personal data**

You can exercise the right of access, rectification, updating, integration, cancellation, limitation to processing, portability in respect to your personal data.

In case you provided your consent to the processing of personal data, you may withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

If your personal data are transferred outside the European Economic Area, you have the right to obtain copy of such data as well as indication of the Country/Countries where the data have been made available.

Insofar as applicable, you have the right to object to the processing of your personal data and request the stop of the processing operations when they are based on the legitimate interest .

In case you consider that the processing of your personal data infringes the applicable privacy laws, you have the right to lodge a complaint with a supervisory authority. You can contact the Italian Personal Data Protection Authority – *Garante per la Protezione dei Dati Personali* with the modalities indicated on the Authority's website ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

You can exercise your rights by contacting the Data Protection Officer at the contact details above indicated. The request of exercise of rights is free of charge unless the request is manifestly unfounded or excessive.

## **8. How long we retain your personal data**

Your personal data are retained for the period necessary to fulfil the purposes for which it was collected, pursuant to paragraph 2 above. In particular,

- personal data processed for the purposes (1) and (2) are retained for the period necessary to pursue the purposes for which they were collected, but anyway not exceeding 24 months since the Fronting Office ceases to be part of the Network. In case of disputes, for the statute of limitations set forth under the applicable laws, without prejudice to any longer storage periods provided for by specific laws;
- personal data processed for the purpose (3) are retained for the period necessary to fulfil applicable legal obligations, without prejudice to any longer storage periods provided for by specific laws; while
- personal data processed for the purpose (4) are retained for 10 years equal to the statute of limitations set forth under the applicable laws, without prejudice to any longer storage periods provided for by specific laws.

## **Changes and updates of the privacy notice**

Also considering possible amendments of the applicable privacy laws, the Company may integrate and/or update, wholly or partially, this privacy notice.

Any changes, integrations or updates will be communicated through publication on the Company's website (<https://www.generaliglobalcorporate.com/>).