

## **Information on personal data processing in SMARTT GROUP sp. z o.o.**

With regard to 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 (hereinafter referred to as the "GDPR"), we hereby inform that:

1. The Controller of your personal data is SMARTT GROUP sp. z o.o., with its registered office in Warsaw, at ul. Wiśniowa 40 apt. 8, 02-520 Warsaw (the "Controller"). You can contact us in writing at the above-mentioned registered office's address, by e-mail at [ado@smartt.pl](mailto:ado@smartt.pl), or by telephone at the telephone number: (22) 542 41 44.
2. The personal data will be processed for the following purposes:
  - performance of brokerage activities as set forth in the Act of December 15, 2017 on insurance distribution (consolidated text: Journal of Laws of 2018, items 2210, 2243) in connection with the power of attorney granted to us - the legal basis for the processing is, *inter alia*, the need to process the data to conclude and perform a reinsurance contract, an insurance contract or an insurance guarantee contract, as well as the legitimate interest pursued by us, i.e. Article 6(1)(b) of the GDPR (necessity to perform the contract) or Article 6(1)(f) of the GDPR (legitimate interest) or Article 9(2)(f) of the GDPR (the establishment, exercise or defense of claims);
  - providing services or performance of other activities for the entity that provided us with the data, *inter alia*, in connection with providing assistance in the performance of reinsurance contracts, insurance contracts or insurance guarantee contracts, including cases regarding claiming damages or benefits - the legal basis for the processing is Article 6(1)(b) of the GDPR (necessity to perform the contract) or Article 6(1)(f) of the GDPR (legitimate interest) or Article 9(2)(f) of the GDPR (the establishment, exercise or defense of claims);
  - fulfillment of our legal obligations, e.g. resulting from the Act of December 15, 2017 on insurance distribution (consolidated text: Journal of Laws of 2018, items 2210, 2243) - the basis for the processing is Article 6(1)(c) of the GDPR (legal obligation);
  - performance of our contractual obligations and the data provided in connection with the intention to enter into contracts - the legal basis for the processing is Article 6(1)(b) of the GDPR (necessity to perform the contract) or 6(1)(f) of the GDPR (legitimate interest) or 6(1)(c) of the GDPR (legal obligation).
3. Processing of special categories of personal data such as the health data may be carried out for the purpose of performing brokerage activities as set forth in the Act of December 15, 2017 on insurance distribution (consolidated text: Journal of Laws of 2018, items 2210, 2243) and in order to provide assistance in the performance of reinsurance contracts, insurance contracts or insurance guarantee contracts regarding claiming damages or benefits - the legal basis for the processing is Article 9(2)(f) of the GDPR (the establishment, exercise or defense of claims).
4. If the processing is carried out on the basis of Article 6(1)(a) of the GDPR or Article 9(2)(a) of the GDPR, i.e. on the basis of the given consent, you shall have the right to withdraw the same at any time. The withdrawal of the consent shall not affect the lawfulness of the processing based on the consent before its withdrawal. The provision of the data is voluntary but necessary for the performance of the activities commissioned by you or the entity that provided your data to us.
5. The provision of the personal data is voluntary but necessary for the performance of the aforementioned activities commissioned by you or the entity that provided the data to us.
6. The source of the personal data may be you in person, your employer / mandator / other data controller, as well as websites and public registers. The data source may be, in particular, the participants of the insurance market.
7. The personal data may be made available, apart from the persons authorized by the Controller, only to the entities involved in the implementation of the purposes indicated above, e.g. to reinsurers, insurers, entities involved in the establishment, exercise or defense of claims, to technical service providers, to entities providing consulting services, etc.
8. Subject to all data security guarantees, the personal data may be transferred to third countries, i.e. countries outside the European Economic Area, provided that the conditions set out in Chapter V of the GDPR are met.
9. The personal data will be processed for the period necessary to achieve the above mentioned purposes, in particular until legal obligations are fulfilled, until the time during which the law obliges to store the data, as well as until the limitation of claims.
10. You shall have the following rights:
  - to access the personal data and request their rectification, erasure or restriction of their processing;
  - to data portability in the cases indicated in the GDPR;
  - to object to the personal data processing;
  - to withdraw your consent to the extent that the processing of the personal data is based on your consent;
  - to lodge a complaint with the personal data protection supervisory authority.
11. Your personal data will not be processed by us in an automated manner (including profiling).