



RedClick  
GENERALI

# Summary Data Protection Notice

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*May 2024*

Generali Seguros y Reaseguros, S.A.U.



# Summary Data Protection Notice

This notice applies to all your dealings with us whether online or through offline correspondence. If you are providing information relating to other people such as named drivers or joint proposers, you must ensure you have obtained the permission of any person who is also covered on your insurance and provide this notice to them so that they can understand how we process their Personal Data.

## 1. Identification and contact details of the Data Controller

Generali Seguros y Reaseguros, S.A.U., acting through its Irish Branch, with registered office at C/ Paseo de las Doce Estrellas, 4, 28042 Madrid, with VAT number A-48037642 (hereinafter “RedClick” or the “Insurer”) is the Data Controller of the processing of Personal Data in the context of the insurance contract and/ or quote. This notice provides information on how the Insurer will use your Personal Data.

The Insurer has a Data Protection Officer (“DPO”) appointed before the Data Protection Commission, who can be contacted at the following address [dpo@generalion.es](mailto:dpo@generalion.es).

## 2. The categories of Personal Data

The Insurer will process Personal Data, including health data where applicable in the event of a claim, provided directly by the data subject, or obtained by other lawful means. Data may be received from third parties, such as lawyers, experts, insurance companies, clinics, and hospitals, among other entities whose information must be communicated to the Insurer. In addition, the Personal Data processed may relate to the policyholder, insured person, third-party claimant, representatives, witnesses and others. By completing and sending the required information requested through the different channels available, online or offline, you declare that the information and data you have provided in them are accurate and truthful.

The Personal Data processed may be among the non-exhaustive list of the following categories: identification, demographic and location data; financial data, including bank account and credit/debit card details; policy and claims data, including information on previous claims; credit and anti-fraud data, namely criminal convictions and offences, including to confirm the validity of the driver number, as established by law, together with the driver’s penalty points, when applicable; metadata, if you interact with the Insurer’s online platforms; and voice, if calls take place.

## 3. To whom we disclose your Personal Data

To carry out the contracted services, the Insurer shares Personal Data with a group of entities specialized in their field of activity. As part of the day-to-day administration of your quote and/ or policy, we share your information with the following categories of recipients: authorities and similar entities; Generali group of companies; various service providers for the purposes that we highlight below in Section 5; your insurance broker(s); sectorial files, with historic information regarding policies and/ or claims, such as Insurance Link and Insurance Ireland; records managed by third parties, with relevant information for risk assessment, such as credit information; and reinsurance companies.

## 4. Exercising your rights

You can exercise the right: of access to your Personal Data to find out what data are being processed, and if so, the specific processing carried out; to rectification of any inaccurate Personal Data; to delete your Personal Data; to object to the processing of your Personal Data; to request the limitation of the processing of your Personal Data; of portability of your data; to withdraw the consent granted to the Insurer for the processing of your data; and, not be subject to automated decisions, including profiling – within this scope, your rights to obtain human intervention from the Insurer, to express your point of view and to challenge the Insurer's decision are guaranteed. You also have the right to lodge a complaint with the Insurer or with the Data Protection Commission if you consider that an infringement of data protection legislation has been committed with respect to the processing of your Personal Data. You can exercise your rights at any time and free of charge by email at [DataProtectionOfficer@redclick.ie](mailto:DataProtectionOfficer@redclick.ie).

## 5. Detailed information on the processing carried out

The purposes of the processing of your Personal Data, that is, the reason why the Insurer processes your Personal Data, and the legal basis that allow the processing of data by the Insurer for each of the purposes indicated, are as follows:

### Purpose of the processing

Give support and manage Customer requests received through the different contact channels, as well as the overall management of contract/quote and portfolio, including payments, renewals, seizures requests, compensation in case of loss, recoveries, claims handling, whether they involve bodily injury or not, as well as any complaint or queries made, including the ones related with data privacy and exercise of GDPR rights. The latter may include requests for access to telephone calls which, if granted, involve sending the call to the data subject, including the voice of the interlocutors.

In all of these instances, your call may be recorded in order to monitor and improve the service provided, and as a means of proving the existence and veracity of commercial transactions and queries made.

### Legal basis

Depending on the specific case: (i) Management of the contractual or pre-contractual relationship; (ii) Insurer's legitimate interest in calculating the insurance premium, in improving the user experience in Customer services, and in streamlining the management of claims by processing them through sectorial covenants; and (iii) Compliance with legal obligations.

Follow up on the insurance quote during its validity period, for which we can contact you by email, telephone, SMS or other.

Management of the pre-contractual relationship

Create profiles for statistical-actuarial purposes, to make a segmentation based on the risk level, according to pricing and predictive models. For which we can also consult available credit information files, managed by third parties, with information on non-compliance with monetary, financial or credit obligations.

Depending on the specific case: (i) Management of the contractual or pre-contractual relationship; (ii) Compliance with legal obligations; and (iii) Insurer's legitimate interest in assessing the maintenance of the insurance contract, and in assessing the breach of monetary, financial or credit obligations, due to a future periodic payment relationship.

Manage the clients of the brokers' channel, including changes of broker, portfolio transfers, among others. As well as to carry out and manage the reinsurance.

Depending on the specific case (i) Management of the contractual relationship; (ii) Insurer's legitimate interest in managing its portfolio of clients and brokers in an agile and efficient manner, and in sharing the risks and providing confidence to the Insurer and its Customers; and (iii) Compliance with legal obligations.

Carry out marketing campaigns related to discounts, offers and information about RedClick's products, by email, telephone, SMS or post; and, through social networks and search engines.

Depending on the specific case (i) Consent(s) of the data subjects; and (ii) Legitimate interest of the Insurer in promoting its brand and offering its Customers products according to their characteristics and needs, when the marketing relates to products complementary to those you have contracted or that represent an improvement, such as cross-selling.

Execute and manage quality surveys on RedClick's insurance products and services, sent via email, SMS or telephone. As well as to send informative communications about: loyalty programs; rewards for referring RedClick to family and friends; greetings on special occasions, newsletters, or sponsorships; and events organized by the Insurer.

Legitimate interest of the Insurer in promoting its brand and improving its services and products.

Analyse, monitor and plan results and productivity for strategic decision-making and ensure that Insurer's procedures and initiatives are aligned with quality standards. As well as to carry out internal and/or external audit processes, and to guarantee the security and efficiency of the technological structure of the Insurer.

Depending on the specific case (i) Legitimate interest of the Insurer in determining the risks and costs associated with the insurance, in predicting and analyzing aspects of its business, in improving its products and processes, for decision making and to ensure that all procedures meet the quality standards set, and in guaranteeing cybersecurity and information security, the performance of applications and the improvement of the services provided; and (ii) Compliance with legal obligations.

Investigate and prevent fraud, at the time of the conclusion of the contract, during its validity and after its resolution. As well as to implement anti-money laundering and counter-terrorism procedures. Complaints made through the Insurer's Ethics Line(s) are taken into consideration.

Depending on the specific case (i) Insurer's legitimate interest in avoiding situations of fraud, which harm the Insurer and the general public, taking into account that an increase in claims and fraud is reflected in an increase in premiums; and (ii) Compliance with legal obligations.

Perform corporate operations, such as modifications to the business structure, mergers, spin-offs, terminations, creations, or other operations of the same kind, in the preparatory period, prior to the corporate operation, and subsequently, for its completion, for which your data may be communicated to companies of the group to which the Insurer belongs, namely, to the group's company that intervenes in the corporate operation.

The Insurer's legitimate interest.

## 6. International transfers of Personal Data

Many of our processing activities require the transfer of data internationally to service providers and to entities of the group to which the Insurer belongs. The data sharing with entities of the Generali Group only occurs when necessary, according to the circumstances of the specific case and/ or the insurance contracted, in accordance with the legitimate interest of the Insurer and the Group in having a centralized and unified management of the business, in accordance with Recital 48 of the GDPR.

We transfer data to the United States, Asia, South America and the United Kingdom for: recurring or occasional technological services; pricing, under-writing and consulting services; business and administrative management at a Group level; financial services; reinsurance; and customer services. The transfer will only take place when there are adequate guarantees, such as Standard Contractual Clauses or an Adequacy Decision of the European Commission.



## 7. Personal Data Retention

We keep your Personal Data for the time necessary for the purposes for which they were collected. Subsequently, your Personal Data will be retained, with restricted access, during the statute of limitations of the legal obligations associated with the quote, policy and/or claim(s), after which will be eliminated.

You can request detailed information regarding any of the previous Sections by sending an email to the address [DataProtectionOfficer@redclick.ie](mailto:DataProtectionOfficer@redclick.ie), indicating the specific activity for which you would like to receive more information. For the full information on how RedClick processes your Personal Data, please go to our website at [www.redclick.ie/privacy-policy-and-general-data-protection-regulation](http://www.redclick.ie/privacy-policy-and-general-data-protection-regulation). This Data Protection Notice was updated in May 2024.



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