



"BTA Baltic Insurance Company" AAS
Estonia

PRIVACY POLICY



1. INFORMATION ABOUT THE CONTROLLER

The personal data processing controller is AAS „BTA Baltic Insurance Company“ Estonian branch, hereinafter – BTA, registration number 11223507, legal address Lõõtsa 2b, 11415, Tallinn, Estonia.

BTA can be contacted by e-mailing to bta@bta.ee or writing to the specified legal address.

2. DOCUMENT PURPOSE

This BTA Privacy Policy, hereinafter – the Policy, describes the basic principles of personal data processing conducted by BTA.

3. GENERAL INFORMATION

3.1. BTA, within the applicable regulatory enactments, ensures the Personal data confidentiality and takes appropriate technical and organisational measures for Personal data protection against unauthorized access, illegal processing or disclosure, accidental loss, modification or destruction.

3.2. BTA for Personal data processing may use Processors, which have been concluded data processing agreements with. In such cases BTA takes necessary measures to ensure that such Processors conduct the Personal data processing in line with BTA's instructions and in compliance with the applicable legal enactments and demands appropriate security measures be taken.

4. USED TERMS AND ABBREVIATIONS

Customer – a person with intention to enter into an insurance or reinsurance contract or who is an insurance policyholder under an insurance contract or a reinsurance policyholder under a reinsurance contract.

Personal data – any information relating to an identified or identifiable natural person ('Data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, religious, economic, cultural or social identity of that natural person, to include any data about insurance or indemnities of natural persons, BTA employees and cooperation partners.

Processing – any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor – a natural or legal person, public authority, agency or other body, which processes personal data on behalf of the controller.

VIG – Vienna Insurance Group AG.

EU/EEA – European Union and European Economic Area.

LKF – The Estonian Traffic Insurance Fund.

MNT – Estonian Road Administration.



5. PURPOSES AND BASIS FOR PERSONAL DATA PROCESSING

BTA processes personal data based on the following processing purposes:

5.1. Insurance services provision

To identify a customer, prepare an insurance offer, conclude and execute insurance contract, to include gaining assurance of occurrence of an insured risk for insured risk occurrence inspection and insured event adjustment or compliance with a legal obligation.

5.2. Risk management.

To avoid fraud cases, for Customer risk and credit risk assessment, complaints handling.

5.3. Human resources management.

Candidate selection, conclusion and execution of employment contracts.

5.4. Preparing and sending special offers of BTA and BTA cooperation partners.

Organization of lotteries, conducting customer surveys, dissemination of commercial messages.

5.5. Exercising and protecting rights and legal interests.

Compliance with the effective legal enactments concerning insurance services provision.

5.6. Accepting and providing insurance intermediary services.

To conclude and execute insurance contract.

5.7. Statistics.

Compiling statistical data about the customer, incl. about the used insurance services and insurance claims.

6. CATEGORIES OF PERSONAL DATA RECIPIENTS

BTA, in compliance with requirements of the applicable legal enactments, is entitled to transfer Customer's personal data to the following entities:

6.1. VIG group companies for personal data processing in accordance with purposes defined by BTA.

6.2. Persons, which BTA cooperates with for execution of the conclude insurance contract, or, to sustain its operation or functions, incl. reinsurance companies, but only within a scope required to achieve the purpose.

6.3. Persons providing BTA with monitoring and collection services of policyholder's overdue insurance premium or other payments under insurance contract, but only within a scope required to achieve the purpose.

6.4. Financial services providers, having an insurance contract concluded in their favour, to inform them about insurance contract terms, insurance contract validity and insurance claims adjustment, but only within a scope required to achieve the purpose.

6.5. To LKF system RELIKA, maintained by the LKF, while the accuracy, integrity and accessibility of the respective data is the responsibility of the MNT and BTA, who has sent the data to the MNT, within a scope defined in the regulatory enactments regulating the field of compulsory civil liability insurance of owners of motor vehicles.

6.6. Other partners, related to BTA service provision, such as, for instance, archiving, postal services providers, as well as the ones providing services to BTA's customers – medical institutions, sports clubs, pharmacies, optical shops.



7. GEOGRAPHIC SCOPE OF PROCESSING

Personal data processing, in compliance with legal enactments, may take place in Estonia, as well as other EU/EEA member countries or other than EU/EEA countries.

Personal data transferring and processing outside EU/EEA may take place, provided there are legal grounds for that and due security measures have been taken to maintain Personal data protection on the level of Personal data protection in Estonia.

8. DATA STORAGE PERIOD

Personal data will be processed only as long as necessary. Storage period can be justified, while at least one of the following conditions is in effect:

- there is an effective Contract between the customer and BTA;
- personal data storage term is defined in legal enactments;
- necessity to exercise and protect the legitimate interests of BTA;

Customer may object to his or her personal data processing within the scope defined in legal enactments by notifying BTA thereof, inasmuch the personal data processing is not related with BTA's obligations and rights.

9. CUSTOMER'S RIGHTS

BTA takes care that the following rights of Customers are satisfied:

9.1. Right to access own data

BTA provides an opportunity to the Customer to have access to his or her personal data, which are being processed.

9.2. Right to rectification of own data

BTA, when receiving a reasoned request from the Customer for rectification of data, rectifies the inaccurate data and/or completes incomplete Personal data without undue delay, taking into account the processing purposes.

9.3. Right to object to processing of own data based on consent

BTA provides an opportunity to the Customer to withdraw his or her consent provided to his or her Personal data processing and, upon receipt of a respective request from the Customer, BTA immediately stops processing the Customer's Personal data.


9.4. Right to erasure or right to be forgotten

BTA takes care of erasure of the Customer's Personal data at the request of the Customer, for instance, when the Customer's Personal data are processed based on the Customer's consent and the Customer has withdrawn his or her consent. This provision is not in effect, when the processing of the Personal data, the erasure of which the Customer requests, is conducted by BTA on another legal basis, for instance, compliance with contractual liabilities, statutory requirements.

9.5. Right to data portability

BTA provides an opportunity to the Customer, upon the Customer's request, to receive his or her Personal data, which he or she has provided to it and which are processed based on the consent and contractual performance, in writing or any of most popular electronic formats.

9.6. Right to lodge a complaint regarding data processing



Customer is entitled to right to lodge a complaint regarding Personal data use with the Data State Inspectorate, if the Customer considers that BTA violates his or her rights and interests in Personal data processing in accordance with the applicable legal enactments.

10. PROFILING, PERSONALIZED OFFERS AND AUTOMATIC DECISION MAKING

10.1. Profiling is automated processing of Personal data, used for automated decision-making and direct marketing purposes.

10.2. BTA processes Personal data to prepare offers appropriate for the Customer. Unless the Customer has objected to the receipt of commercial messages, BTA is entitled to conduct Personal data processing for preparation of general and personalized offers of BTA services.

10.3. BTA takes care that Customers are able to make their choice and use a tool to manage their privacy settings.

11. CONTACT INFORMATION

The Customer may contact BTA with respect to consent withdrawal, requests, exercising rights of data subjects and complaints regarding Personal data use.

11.1. The Customer may e-mail to bta@bta.ee or write to the Lõõtsa 2b, 11415, Tallinn, Estonia .

11.2. Contact information regarding personal data protection: andmekaitse@bta.ee or writing to the address Lõõtsa 2b, 11415, Tallinn specifying – to contact person of personal data protection.

12. POLICY VALIDITY AND AMENDMENTS

12.1. BTA is entitled to unilaterally amend this Policy at any time in line with the applicable legal enactments.

12.2. This Policy is available to Customers on BTA's website www.bta.ee