

Kindlustusest Kindlustusmaakler OÜ

PRINCIPLES OF PROCESSING CLIENT DATA

Table of Contents

1. DEFINITIONS.....	2
2. PROCESSING CLIENT DATA.....	2
3. LEGALITY OF PROCESSING CLIENT DATA	2
4. CONTENT OF CLIENT DATA.....	2
5. OBJECTIVE OF PROCESSING CLIENT DATA	2
6. DISCLOSING AND FORWARDING CLIENT DATA TO THIRD PERSONS.....	2
7. SECURITY OF PROCESSING CLIENT DATA.....	3
8. PROCESSING CLIENT DATA IN DIRECT MARKETING AND FOR RESEARCHING CLIENT HABITS AND SATISFACTION	3
9. RECORDING CLIENT DATA	3
10. AMENDING CLIENT DATA AND ENDING THEIR PROCESSING	3
11. PROTECTION OF CLIENT RIGHTS	3
12. AMENDING THE PRINCIPLES OF PROCESSING CLIENT DATA	3

1. DEFINITIONS

- 1.1. **Broker** is the company Kindlustusest Kindlustusmaakler OÜ, which is operating as an insurance broker (registry code 10703702) and entered in the list of insurance brokers of the Financial Supervision Authority (www.fi.ee). The registered address of Kindlustusest Kindlustusmaakler OÜ is Mustamäe tee 55, 10621 Tallinn, telephone 12 555, from abroad +372 686 5005, e-mail: info@kindlustusest.ee, website www.kindlustusest.ee.
- 1.2. **Client data** is any data known to Kindlustusest Kindlustusmaakler about the client (e.g. name, personal ID code, contact information).
- 1.3. **Processing client data** is any action done with client data (e.g. collecting, recording, storing, amending, making enquiries about, using, forwarding client data).
- 1.4. **Principles of processing client data** are this document, which regulates the processing of client data in Kindlustusest Kindlustusmaakler.
- 1.5. **Client** is any natural or legal person or their representative who uses, has used or has expressed the intention of using insurance mediation service provided by Kindlustusest Kindlustusmaakler and also other services. A client is also a person provided as the insured person in the insurance contract mediated by Kindlustusest Kindlustusmaakler, or, if provided by the nature of the insurance contract, the person provided as the beneficiary.
- 1.6. **Third person** is any person who is not the client.
- 1.7. **Service** is the service provided to the client by the broker.
- 1.8. **Transaction relationship** is a legal relationship incurred between the client and Kindlustusest Kindlustusmaakler when the client uses, has used or has expressed the desire to use any service provided by Kindlustusest Kindlustusmaakler.
- 1.9. **Authorised processor** is a person who processes client data in the name of Kindlustusest Kindlustusmaakler.

2. PROCESSING CLIENT DATA

- 2.1. When the client enters in a transaction relationship with the broker or expresses the intention to enter a transaction relationship, then the broker shall process his or her client data pursuant to the principles of processing client data.

3. LEGALITY OF PROCESSING CLIENT DATA

- 3.1. Processing client data by the broker takes place pursuant to procedure provided by the Personal Data Protection Act, Insurance Activities Act, and other relevant legislation, recommendations by supervising authorities and principles of processing client data.
- 3.2. In addition to the above, the rights and obligations of the broker and client in processing client data may be regulated by a contract concluded between the broker and the client.

4. CONTENT OF CLIENT DATA

- 4.1. The broker processes all data which have become known to it about the client in the course of the transaction relationship.
- 4.2. The broker processes predominantly, but not only, the following client data:
 - 4.2.1. personal information of the client (e.g. name, personal ID code, language of communication, number of bank account and other connections with third persons);
 - 4.2.2. contact information of the client (e.g. address, telephone number, e-mail address);
 - 4.2.3. data necessary to assess insurable interest or for performing other actions preceding the concluding of an insurance contract and issuing a policy (e.g. information on previous loss events);
 - 4.2.4. information of the client regarding financial experience necessary for assessing the suitability of a life insurance contract with investment risk for the client.
- 4.3. With the separate consent of the client, the broker may also process sensitive personal data of the client if this is necessary for providing insurance mediation service to the client.
- 4.4. Sensitive personal data are data concerning the state of health and disability or genetic information.

5. OBJECTIVE OF PROCESSING CLIENT DATA

- 5.1. The broker processes client data in order to provide insurance brokerage service to the client, conduct insurance analyses and risk assessments, consult the client about issues concerning insurance, incl. in the case of a loss event, organise the performance of the insurance contract, and assess the suitability of a life insurance contract with investment risk for the client.
- 5.2. The broker processes client data in order to offer carefully selected services of cooperation partners to the client, to better understand the expectations of the client on the broker's services and to organise promotions and campaigns.

6. DISCLOSING AND FORWARDING CLIENT DATA TO THIRD PERSONS

- 6.1. The broker discloses or forwards client data to:
 - 6.1.1. persons who are connected with performing the contract concluded with the client (e.g. insurance companies, other insurance brokers, communications and printing service providers, IT service providers);
 - 6.1.2. registrars of databases (e.g. the registrar of the Population Register or the Commercial Register) to confirm the conformity of client data to data in the database, ensure the correctness of client data or receive necessary additional data on the client;
 - 6.1.3. consultants, auditors or other service providers of the broker if the client data is necessary for them to provide quality service to the broker and in the condition that such persons perform the organisational, physical and IT-related requirements established by the broker for keeping in confidentiality and protecting the client data;

- 6.1.4. service provider whom the broker has delegated its main activity or supporting activity in part or in full pursuant to procedure and extent provided by the law in the terms and conditions provided in clause 6.1.3.;
 - 6.1.5. authorised employees whose data are available on the broker's homepage www.kindlustusest.ee;
 - 6.1.6. the new creditor in the case of transferring the right of claim.
- 6.2. The broker discloses client data to third persons only in the extent necessary for achieving the objectives provided in point 5 of the principles of processing client data.
 - 6.3. The broker may send client data to a foreign country to perform the client's order: a European Union member state, an EEA state, as well as a third country, the level of protection of personal data of which the European Commission has deemed sufficient. Client data may be forwarded to countries not provided above with the permission of the Data Protection Inspectorate. Third persons located in a foreign country may process client data pursuant to the law of their country of location.

7. SECURITY OF PROCESSING CLIENT DATA

- 7.1. The broker protects the client data with relevant rules of security and confidentiality and has adopted the necessary organisational, physical and IT-related means to protect client data.
- 7.2. Pursuant to the Insurance Activities Act, employees of Kindlustusest Kindlustusmaakler are obligated to keep the sensitive personal data of the client as well as business and professional secrets in confidentiality for an unspecified term.
- 7.3. The broker requires that persons, to whom client data is forwarded pursuant to the principles of processing client data, perform the security and confidentiality requirements of Kindlustusest Kindlustusmaakler.
- 7.4. The broker permits access to client data only for employees who have received relevant training. An employee has the right to process client data only in the extent necessary for performing the work tasks provided by Kindlustusest Kindlustusmaakler.

8. PROCESSING CLIENT DATA IN DIRECT MARKETING AND FOR RESEARCHING CLIENT HABITS AND SATISFACTION

- 8.1. The broker has the right to forward tenders by cooperation partners. A cooperation partner shall not receive client data if the client has not expressed specific interest in the goods or services offered by the cooperation partner.
- 8.2. The client has the right to notify the broker of his or her desire not to receive personal offers and advertisements at any time. Information on how to refuse further personal offers and advertisements forwarded via a public communications network is provided with the offer or advertisement.
- 8.3. A personal offer is not general and introducing information on services provided by the broker, as well as information connected with managing the service and performing the brokerage contract (e.g. information on the expiry of the insurance contract). The client cannot refuse such information.

9. RECORDING CLIENT DATA

- 9.1. The broker has the right to record all orders provided by means of communication (e.g. telephone, e-mail, website), as well as any other activities made by the client, and if necessary, use those records for verifying and/or reproducing the client's insurable interest or other activities.

10. AMENDING CLIENT DATA AND ENDING THEIR PROCESSING

- 10.1. The client undertakes to immediately inform the broker of any changes in client data recorded in contracts or other documents issued to the broker.
- 10.2. The client has the right to review his or her client data at the broker's location.
- 10.3. The client has the right to require that the processing, disclosure and/or enabling of access to his or her client data is ceased and/or the collected client data is deleted on the basis provided by the Personal Data Protection Act or other relevant legislation.
The relevant application must be submitted in form reproducible in writing.
If the client withdraws or restricts the consent to process client data, the broker has the right to extraordinarily cancel the brokerage contract concluded with the client without notice.
- 10.4. The broker processes the data as long as it is necessary to perform the objectives of processing client data or the obligation provided by legislation.

11. PROTECTION OF CLIENT RIGHTS

- 11.1. If the client finds that the broker has violated his or her rights in processing client data, then he or she has the right to file a claim with the broker for the cessation of violation.
- 11.2. The client has the right to file with the Data Protection Inspectorate or a competent court at any time upon the violation of his or her rights.
- 11.3. If it is determined that the client's rights have been violated in processing client data, then the client has the right to require that damages caused to him or her with the violation are compensated.

12. AMENDING THE PRINCIPLES OF PROCESSING CLIENT DATA

- 12.1. The broker has the right to amend the principles for processing client data unilaterally at any time, with consideration for the provisions of the law.
- 12.2. The broker notifies the client of changes in the principles of processing client data at the agencies of Kindlustusest Kindlustusmaakler, on the Internet homepage of the company or in another way (e.g. via the media) at least 1 (one) month before the amendment's entry into force.