

# INFORMATION ABOUT THE PROCESSING OF DATA FROM YOUR HOME POLICY AND OTHER POLICIES OTHER THAN AUTOMOBILE, LIFE, ACCIDENT AND FUNERAL INSURANCE.

## Data controller

In accordance with the applicable data protection regulations, we inform you that your personal data as an insurance applicant or policyholder, as the case may be, will be processed by LIBERTY SEGUROS, Compañía de Seguros y Reaseguros S.A. with registered offices at Paseo de las Doce Estrellas, 4, 28042 Madrid, Spain ("**Liberty Seguros**"), in its capacity as the data controller. If you do not provide the mandatory and essential information requested, the pre-contractual and/or contractual relationship with you will not be possible.

You may contact the Data Protection Officer at the address [dpo@libertyseguros.es](mailto:dpo@libertyseguros.es)

## Purposes and legitimization of the processing of your personal data

Your personal data will be processed for the following purposes and on the basis of the legitimate grounds indicated below:

- To formalise, manage and execute the pre-contractual relationship and/or the insurance policy, the execution of the pre-contract and/or insurance policy being the legitimate basis of this processing;
- We also inform you that, to the extent that Liberty Seguros also processes health data, Law 20/2015, of 14 July, on the management, supervision and solvency of insurance and reinsurance companies ("**LOSSEAR**") covers the processing of such data that is necessary for the execution of the insurance contract and for reasons of public interest in the field of public health;
- To make recordings or interventions in telephone conversations between you and Liberty Seguros as a result of our legitimate interest in controlling the quality of our services and guaranteeing the security of our calls. Therefore, please note that you have no expectation of confidentiality/privacy in your communications with Liberty Seguros. We also inform you that, also based on the legitimate interest of Liberty Seguros, such calls may be used as evidence in any judicial or extrajudicial proceedings;
- Preparation of profiles for statistical-actuarial purposes necessary for the determination of the insurance policy risk and premium, both before and during the term of the contract, in accordance with your new personal circumstances or the change in the actuarial technical bases, for which Liberty Seguros may consult common files protected by codes of conduct of the insurance sector, the legitimate basis for this processing being LOSSEAR and the execution of the insurance policy;
- Preparation of profiles for the design and marketing of insurance, with the aim of carrying out an assessment of the policyholder's profile that determines the type of insurance that best suits their characteristics and profile and, where appropriate, that of the insured person, with compliance with the legal obligations included in Directive EU 2016/97 of the European Parliament and of the Council of 20 January 2016 on the distribution of insurance ("**DDS**") and/or any other regulation that may develop or replace it in the future as the legitimate basis for this processing;
- Consultation of common files protected by codes of conduct of the insurance sector with the aim of preventing fraud, the basis for this processing being LOSSEAR as well as the legitimate interest of Liberty Seguros;
- Consultation of common files relating to the non-compliance of monetary obligations in order to assess their economic solvency, with the aim of calculating the risk associated with their insurance policy as well as fixing their premium and thus being able to execute their contract in compliance with our legal obligations;
- Comply with the obligations set forth in Law 50/1980, of 8 October, on Insurance Contracts ("**LCS**"), LOSSEAR, DDS, Law 26/2006, of 17 July, on private insurance and reinsurance brokerage ("**LMSRP**") and other regulations applicable to insurance companies. By way of example: management of complaints and claims, provision of technical provisions, records of policies, claims and investments, or adoption of effective measures to prevent, identify, detect, report and remedy fraudulent conduct;
- Communication, if applicable, of data between the broker and Liberty Seguros, before the conclusion of the insurance policy and during its validity, the legal basis being the LMSRP and the legitimate interest it has;
- In co-insurance, reinsurance, assignment or portfolio management operations in which Liberty Seguros is involved, the legitimate basis being the LCS and LOSSEAR, as well as the legitimate interest that Liberty Seguros holds;
- Carry out statistical-actuarial studies based on the legitimate interest of Liberty Seguros;
- Send advertising and/or promotional actions of various kinds by any means (e-mail, postal mail, SMS, telephone, Internet advertising or other equivalent electronic means of communication), relating to own insurance products, as well as loyalty programmes, while the insurance policy is in force. All this on the basis of the legitimate interest of Liberty Seguros or the regulations applicable to the sending of electronic communications, if these means are used for the sending of such communications. This processing also includes the preparation of the corresponding profiles.
- Sending advertising and/or promotional actions by any means (e-mail, postal mail, SMS, telephone, advertising displayed on the Internet or other equivalent electronic means of communication), while the policy is in force and that are not included in the previous section. In this sense, the communications will refer to products that are not similar to those that were the subject of the contracting (for example, pension plans) and may include actions of various kinds, among others: current news, information on our Corporate Social Responsibility and similar actions, as well as others aimed at offering a closer and more personalised service, such as the sending of congratulations at special events. This is provided that you have given your consent for this purpose, including the preparation of the relevant commercial profiles;
- Send commercial communications of own insurance products and pension plans as well as the corresponding profiles, once the insurance policy has been cancelled and even if it is not concluded, on the basis of their legitimate consent; and

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- Carry out quality surveys related to the insurance policy in view of Liberty Seguros' legitimate interest in its correct execution.

The execution of the pre-contract and/or insurance policy shall not be subject to your consent for that processing where this is the legitimate basis.

## Categories and origin of personal data

The personal data we process (including health data) will be that which we collect about you under the pre-contract and/or insurance policy and that which we obtain from other available sources, provided that such collection is permitted by law:

- We may process the data provided prior to contracting the insurance contract (quotation, project, insurance application) as well as those included in the policy and/or others generated during the contractual relationship; and
- With respect to the information collected from other sources, the data we obtain from common files will be processed for the purposes of equity and creditworthiness. In addition, in the context of the execution of the insurance policy, data may be collected from other third parties, such as lawyers, experts, insurance companies, hospitals and workshops.

The data to be processed may be related to the policyholder, as well as to any third party natural person related to the insurance policy (e.g.: insured parties, beneficiaries or injured third parties). In this case, you declare that you have previously and appropriately informed such persons about the processing of their personal data.

## Recipients of your personal data

Your personal data may be communicated to the following categories of recipients:

- Other insurers and reinsurers for reasons of co-insurance, reinsurance or carrying out related operations, portfolio assignment or management, having regard to the LCS, LOSSEAR and the legitimate interest of Liberty Seguros;
- Private investigators, security forces, judges and courts for the purpose of investigating fraudulent conduct as the processing is necessary in accordance with article 100 of LOSSEAR, and in view of the Liberty Seguros' prevailing legitimate interest in complying with the provisions of that article.
- Liberty Mutual Insurance Company, Liberty Mutual Group Incorporated, Liberty International Holdings Ind, Liberty Mutual Technologic Group, Inc. and other entities of the Liberty Group which, as data processors, are responsible for the centralisation of IT processes and applications;
- Data processors for the provision of professional services (e.g. external lawyers) and hosting and data processing, for the provision of network and information security services, for customer relations and for the provision of cloud computing services;
- Public and private bodies with the purpose of investigating commercial transactions on the basis of legitimating compliance with regulations against corruption, fraud and economic and commercial sanctions;
- Entities managing joint files for solvency purposes in the event of non-payment of the premium, having regard to the legitimate interests of Liberty Seguros; and

## International transfers of your personal data

Your personal data may be transferred to the categories of recipients listed in the previous paragraph, some of whom are located in countries outside the European Union, including countries that do not provide a level of data protection equivalent to that of the European Union. However, in these cases, they will be processed with scrupulous compliance with European and Spanish legislation and the following guarantees will be implemented:

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Categories of recipients	Country	Guarantee
Reinsurance entities	Switzerland	Adequacy Decision
Reinsurance entities	United States	Standard clauses approved by the Committee/ Binding Corporate Rules (BCR) / Privacy Shield
Liberty Mutual Insurance Company for the centralization of IT processes and applications	United States	Standard clauses approved by the Committee
Data processors for the provision of network and information security services and relations with clients and insurance brokers	United States	Standard clauses approved by the Committee
Data processors, for the provision of cloud computing services to Liberty Seguros	United States	Contracts/guarantees declared adequate by data protection authorities/Privacy Shield
Public and private bodies with the purpose of investigating commercial transactions on the basis of legitimating compliance with regulations for the fight against corruption, fraud and economic and commercial sanctions	United States	Standard clauses approved by the Committee

If you wish to obtain a copy of the above guarantees, you can contact the Data Protection Officer at [dpo@libertyseguros.es](mailto:dpo@libertyseguros.es)

### Rights that will assist you in the processing of your personal data

You have the right that Liberty Seguros confirm whether or not your personal data is being processed and, where appropriate, to request access to personal data and certain information about the processing (purposes, categories of data processed and recipients, among others) aspects). Likewise, you have the right to request the correction of inaccurate data, as well as their deletion when, among other reasons, these are no longer necessary for the purposes for which they were collected. In certain circumstances (for example, in the event that the applicant challenges the accuracy of your data, while the accuracy of the data is being verified), you may request that the processing of your personal data be limited, and that such data be processed only for the purpose of exercising or defending claims. Likewise, you have the right to revoke the consent and exercise your right to data portability, that is to say, to receive personal data in a structured format, of common use and mechanical reading, and to transmit them to another data processor without the data controller to whom they were provided preventing this, in the cases legally provided for this purpose.

**You also have the right to object to the processing, at any time, for reasons related to your particular situation, if the processing is based on the legitimate interest of Liberty Seguros or a third party. In this case, the Liberty Seguros will end such processing, unless there is evidence of legitimate reasons for continuing with it.**

You may exercise your right by sending a letter to the Data Protection Officer, addressed to the following e-mail address [ejercicioderechos@libertyseguros.es](mailto:ejercicioderechos@libertyseguros.es)

Likewise, you shall have the right to file a complaint with the Spanish Data Protection Agency, when you have not obtained satisfaction in the exercise of your rights.

### Conservation of your personal data

Liberty Seguros will retain your data for as long as the contractual relationship with you is maintained and, once this relationship has ended, for the period of expiry or limitation of the applicable criminal, civil, tax or commercial regulations. Afterwards, they will be eliminated.