

Temporary Frontier Insurance Policy Version 01 – April 2023



Privacy Notice under Art. 13 of Regulation (EU) 2016/679 (GPDR)

UCI shall, pursuant to Articles 125 and 126 of the Code for Private Insurance (*Codice delle Assicurazioni Private*), process some of your personal data so as to be able to provide the insurance services and/or products you requested or for which you are a beneficiary, and, with your consent, to carry out the additional activities detailed below. Pursuant to Art. 13 of Regulation (EU) 2016/679 (hereinafter simply the "Regulation"), we provide you with the following information concerning the processing of your personal data.

- 1- Why do we provide you with this information? So that you can be informed of how we process your Personal Data and know your rights. If you provided us with Personal Data concerning other people, such as the name of the owner of the vehicle if other than you, we invite you to provide them with this document; it is important they are informed of how we process their data and that they know their rights. Given that we process your Personal Data, you have the role of "Data Subject", and UCI has the role of "Controller".
- 2- Who is the Controller for the processing of your Personal Data? The Controller who provides you with this information is UCI scarl National Motor Insurance Bureau for the cross-border circulation of motor vehicles, with whom this temporary frontier policy is entered into.
- 3- How can you contact the Controller or the Data Protection Officer (DPO)? For any queries, need for assistance, or clarifications, you can contact UCI by writing to its Data Protection Officer (DPO) via e-mail: paolo.gnesutta@ucimi.it ordinary mail: Ufficio Centrale Italiano Corso Sempione 39, 20145 Milan Italy
- 4- What are the purposes for processing your Personal Data? Your personal data shall be processed by UCI for the following purposes:
 - Contractual and legal purposes.
 - As to contractual purposes, meaning to provide you with: a temporary frontier insurance policy, which is a motor insurance policy against third party liability (this policy is issued only to allow the entrance and circulation of foreign motor vehicles from Countries which do not belong to the European Economic Area), and for the services and/or assistance requested for purposes strictly connected to insurance activities, which include
 - issuing the policy
 - collection of insurance premium
 - claim payments, or payments for the other services set out in the policy agreement signed
 - preventing and identifying insurance fraud and relative legal actions
 - establishing, exercising, and defending the insurer's rights
 - As to legal purposes, meaning to allow UCI to comply with obligations of law, regulation, EU legislation, and obligations pertaining to internal management and control. Should you decline to provide your Personal Data, it may be impossible for UCI to provide you with the insurance services and/or assistance you requested.



- 5- What Personal Data will be processed? We usually process the data that are strictly necessary to attain the purposes indicated above. We may process personal and identification data, data concerning your image (ID card or other personal ID photo), contact data, data required to verify that the agreement is consistent with your requests and needs, policy data, fiscal data and data concerning payment methods, other personal data you provide, special categories of personal data (data concerning health), data collected from public sources (lists, registers, public records accessible by anyone), data acquired from third parties (...).
- 6- What is the legal basis for processing your Personal Data? Legal bases make the processing of your Personal Data by UCI lawful. For each of the purposes listed under question 4, we provide below their corresponding legal bases. For processing operations carried out for contractual and legal purposes., the legal bases are
 - UCI's compliance with pre-contractual and contractual obligations;
 - applicable sector legislation, whether national or EU;
 - with respect to special categories of personal data (data concerning health), the legal basis is your consent;
 - the legitimate interest of the Company (particularly, the Company's interest in preventing and identifying insurance fraud and relative legal actions, assessing the reliability of payments, to engage in legal proceedings for the purpose of exercising and defending UCI's rights).
- 7- Who may your Personal Data be communicated to? For each of the purposes listed in question 4, please find below the parties to whom we may communicate your data. For processing operations carried out for contractual and legal purposes and for the legitimate interest of the Company (in connection with antifraud activities and pre-contractual checks), your data may be communicated to the following categories of parties: (i) insurers, co-insurers, and re-insurers; (ii) banks and credit institutions; (iii) legal counsel; experts; medical practices, parties involved in the repairing of insured motor vehicles and assets; (iv) service companies, suppliers; (v) companies providing fraud control services, private investigation companies; (vi) debt collection companies; (vii) Italian Association of Insurance Companies (ANIA) and other Members for the purpose Insurance Anti-Fraud Service, consortia and associations, Institute for the Supervision of Insurance (IVASS), and other public bodies specific to the insurance sector; (viii) judiciary, law enforcement, and other public and Supervisory Authorities;
- 8- Can your Personal Data be transferred abroad and/or disclosed? Your Personal Data may be transferred abroad, primarily to countries within the EEA. Your Personal Data may also be transferred to countries outside the EEA (such as Switzerland and the United Kingdom). Every transfer of data is performed in compliance with applicable law and by adopting appropriate measures to guarantee the necessary security levels. Please note that transfers to non-EEA Countries in the absence of adequacy decisions issued by the European Commission are performed on the basis of "Standard Contractual Clauses" to ensure correct processing. You may, in any case, contact the Data Protection Officers using the details listed in paragraph 3 to obtain information concerning the transfer of your data and the specific place where your data are located.
- 9- For how long will your Personal Data be retained? Your personal data will be retained by UCI only for the time strictly necessary for the purposes for which they are processed. More specifically, they will be retained for the following periods: contractual data: for 10 years after termination of the insurance policy;
 data pertaining to anti-fraud activities: for 10 years after termination of the insurance policy;
 data pertaining to activities for the protection of the Company's rights (including in legal proceedings): for the time required for the relevant judgement to acquire the status of res judicata or reach the last instance, and, where necessary, for the ensuring enforcement phase.



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- 10- How are your Personal Data processed? UCI conducts processing operations using codified decision-making processes with respect to anti-fraud checks or checks concerning conducts which may entail the violation of national or supranational legislation. With specific reference to the above, the legal basis for processing for the above operations is the legitimate interest of the Company and its legal obligation to identify fraud arising from the law.
- 11- *What are your rights?* Under Articles 15, 16, 17, 18, 20, and 21 of the General Data Protection Regulation (GDPR), you have the right to
 - access your Personal Data and obtain information concerning the same, and the purposes and methods of processing;
 - obtain the rectification and updating of your Personal Data, ask for the restriction of processing (including, where applicable, the erasure of your Personal Data);
 - object, on legitimate grounds, to the processing of Personal Data, and exercise your right to data portability;
 - lodge a complaint with the competent Supervisory Authority.

How can you exercise your rights? You can simply write to the Data Protection Officer using the details listed in point 3.