

Privacy Policy

ABOUT US

In this privacy notice, references to “we” or “us” or “CODE” are to the company under the name *CODE Underwriting Agency including its affiliated companies and subsidiaries*, and references to “you” or “your” are to the individual whose personal data [may be/is being] processed by an insurance market participant (you may be the *insured, beneficiary, claimant or other person involved in a claim or relevant to a policy*).

Insurance is the pooling and sharing of risk in order to provide protection against a possible eventuality. As we are dedicated to serving the general insurance industry, we understand the importance of maintaining your privacy, keeping your personal information secure and complying with data protection laws.

This notice describes what personal information we may collect from you, why we use your personal information and more generally the practices we maintain and ways in which we use your personal information.

WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

In order for us to provide insurance quotes, insurance policies, and/or deal with any claims or complaints, we need to collect and process personal data about you. The types of personal data that are processed may vary depending on the type of the insurance policy and may include:

Types of Personal Data	Details
Individual details	Name, address, other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and family details
Identification details	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number and tax identification number
Financial information	Bank account or payment card details, income or other financial information
Risk details	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to your health, criminal convictions, or other special categories of personal data.
Policy information	Information about the quotes you receive and policies you take out
Credit and anti-fraud data	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you
Previous and current claims	Information about previous and current claims, which may include data relating to

	your health, criminal convictions, or other special categories of personal data and in some cases, surveillance reports
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WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

We might collect your personal data from various sources, including:

- you;
- your family members, employer or representative;
- other insurance market participants such as brokers;
- credit reference agencies;
- anti-fraud databases, court judgements and other databases;
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers

WHY WE PROCESS YOUR DATA

Quotation/Inception:

We may use your personal data in order to set you up as a client, to evaluate the risks to be covered and to calculate the payment of premium. For this purpose, we may process special categories of personal data, such as health and criminal records, including possible fraud, sanctions, credit and anti-money laundering checks.

Policy administration:

We may use your personal data to provide a proper standard of service, which takes into account your individual needs and circumstances, including communicating with you and sending you updates regarding your insurance policy.

Claims Processing:

We may use your data to manage insurance and reinsurance claims, defend or prosecute legal claims and investigate or prosecute fraud. In order to provide insurance cover and deal with insurance claims in certain circumstances we may need to process special categories of data, such as medical and criminal convictions.

Renewals:

We may use your data to contact you to renew the insurance policy, to re-evaluate the risks to be covered and to decide the appropriate policy/premium. In order to do this, we may need to process special categories of data, such as medical and criminal convictions.

Other reasons:

We may use your data to comply with our legal or regulatory obligations.

Note: Where we process special categories of your data, your consent to this processing may be necessary for us to achieve the purposes described above. You may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our ability to provide insurance or pay claims.

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We may disclose your personal information to the third parties listed below for the purposes described in this privacy notice. The third parties listed below will only use your personal information under our strict instruction and are under an obligation to ensure appropriate security measures are in place.

- Insurers; Reinsurers; Brokers, agents;
- Professional advisors including auditors, solicitors, tax advisors and media sales agencies;
- IT service providers;
- Regional committees including chairmen and event organizers;
- Survey facilitators;
- Providers of accountancy software/system;
- Government departments;

PROFILING AND AUTOMATIC DECISION MAKING

When calculating insurance premiums, we may compare your personal data against industry averages. Your personal data may also be used to create the industry averages going forwards. This is known as profiling and is used to ensure premiums reflect risk. Profiling may also be used by insurance market participants to assess information you provide to understand fraud patterns. Decision-making based solely on automated means happens when decisions are taken about you by technological means and without any human involvement. In this case you have the right to object to a decision based solely on automated means.

HOW LONG DO WE KEEP YOUR PERSONAL DATA

We will keep your personal data only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either you or we may wish to bring a legal claim under this insurance, or where we are required to keep your personal data due to legal or regulatory reasons.

In the event that you submit an insurance application which is not accepted, we will retain your data for a period of one year from the submission

INTERNATIONAL TRANSFERS

We may need to transfer your data to insurance market participants or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the GDPR.

YOUR RIGHTS

The right to access your personal information

Subject to any relevant exemptions, you are entitled to see a copy of the personal information we hold about you and to request details of how we use your personal information including any disclosures made. To exercise your rights to access your personal information, please contact us. There will not usually be a charge for dealing with these requests.

The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is reliable and as accurate and complete as is necessary for its intended use but you are entitled to ask us to update or amend any inaccuracies in the personal information that we hold about you. To request us to update or amend any personal information we hold about you, please contact us.

The right to withdraw your consent

The right to withdraw any consent to personal data processing at any time.

The right to object to automated decision making

You have the right not to be subject to a decision based solely on automated means, if the decision produces legal effects concerning you or significantly affects you in a similar way.

Other rights

You also have the right to require us to:

- delete any personal information that we no longer have a legal ground to rely on;
- object to any processing based on the legal ground of legitimate interests unless our reason for undertaking that processing outweighs any prejudice to your data protection rights;
- provide you or another provider with a copy of your personal information that you provided us with; and
- restrict how we use your personal information whilst a complaint is being investigated.

You may submit a request in order to exercise any of the above rights by contacting us, using the contact details of CODE, as provided below:

Legal & Compliance Department

CODE Underwriting Agency

61 Akadimias Str.

106 79 Athens, Greece

Email: compliance@codeins.com

Tel: +30 210 360 9373

Fax: +30 210 339 0356

If you are not satisfied with our use of your personal information, our response to any exercise of your rights, or if you believe us to be in breach of our data protection obligations, you have the right to complain to the Hellenic Data Protection Authority (www.dpa.gr).

PRIVACY POLICY UPDATES

This privacy policy has been edited according to the April 27th, 2016, General Data Protection Regulation (EU) 2016/679 and Greek legislation, effective since 25/5/2018. It might get updated in the future. All changes will be included in this document, its revision date included in its filename.