

# Personal Data Protection and Privacy Policy

Corbroker - Corretores de Seguros, S.A.

## Commitment

**CORBROKER - Corretores de Seguros, S.A. (“CORBROKER”)**, to provide its products and services, requires to collect and processing personal data of its Clients.

**CORBROKER** is concerned with the privacy and security of its Clients. In this context, **CORBROKER** adopted the present Personal Data Protection and Privacy Policy (“**Policy**”), which applies generally to the collection and processing of the personal data from its Clients and aims to help understand what personal data is collected, how and for what purposes the data is processed, to whom the data is disclosed and how protects the privacy in relation to CORBROKER’s products and services.

For any explanation, additional information or for exercise of rights related to data protection, please contact our Data Protection Officer, through the e-mail: [dpo@corbroker.pt](mailto:dpo@corbroker.pt) ; or through the address Rua Pedro Monjardino, nº 4, 2.º esq. 1600-892 Lisboa.

## Definitions

**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.

**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.

**Controller** - the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data

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

**Recipient** - a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not

**Third party** - a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

**Supervisory authority** - an independent public authority which is established by a Member State pursuant to Article 51 of the General Data Protection Regulation. In the Portuguese case, the Comissão Nacional de Protecção de Dados (CNPd)

## Controller

**CORBROKER – Corretores de Seguros, SA.**, with its head office at Avenida 5 de Outubro, nº 35, 8th floor, 1050-047 Lisbon, with Tax ID number 503 239 470, is the Controller of all product and services, to the extent that determines the purposes and means of the processing of personal data, in the terms of the General Data Protection Regulation.

## Data Protection Officer

**CORBROKER** has designated a Data Protection Officer.

For any explanation, additional information or for exercise of rights related to data protection, please contact our Data Protection Officer, through the e-mail: [dpo@corbroker.pt](mailto:dpo@corbroker.pt) ; or through the address: Rua Pedro Monjardino, nº 4, 2.º esq. 1600-892 Lisboa.

## Process of Personal Data

All the personal data provided by all the Clients in respect with the contractual relation established with **CORBROKER** are processed with respect to the applicable principles, namely: lawfulness, fairness and transparency; purpose limitation; data minimization; accuracy; storage limitation; integrity and confidentiality; and accountability.

## Purposes, Legal ground and Categories of Personal Data

Purposes	Legal ground	Categories of Personal Data
Management of the pre-contractual and contractual relationship - Customer's personal file	Pre-contractual and contractual proceedings	Identification data; Contact data
Issue and management of the insurance policy	Contractual proceedings	Data about insurance products underwritten, such as, policy number, gender, profession, profession, recreational activities, education data, data about vehicles, and others depending on the insurance product underwritten. <b>This may include the processing of special categories of personal data, if the insurance policy so it justifies.</b> (the lack of certain data, may compromise the provision of such product or service by CORBROKER. In this case, the Client will be duly informed about the obligation to provide the data)

Claims management	Contractual proceedings	Identification, contact, insurance policy, data related to the claim, <b>which may include special categories of data, if the insurance policy justifies.</b> (the lack of certain data, may compromise the provision of such product or service by CORBROKER. In this case, the Client will be duly informed about the obligation to provide the data)
Fullfilment of legal obligations, including before Supervisory, Regulatory or Surveillance Authorities; management control to prevent and fight against fraud	<p>Fullfilment of legal obligation.</p> <p>Legitimate interest pursued by the data controller to supervise the activity, including loss prevention by fraud</p> <p>Establishment, exercise or defence of legal claims</p>	Various data, <b>which may include special categories of data, if the insurance policy justifies.</b> (the lack of certain data, may compromise the provision of such product or service by CORBROKER. In this case, the Client will be duly informed about the obligation to provide the data)

### Data Retention

CORBROKER stores data until it is no longer necessary to provide our services, or until the right of erasure is lawfully exercised, whichever comes first. This is a case-by-case determination that depends on things like the nature of the data, why it is collected and processed, and relevant legal or operational retention needs.

All the data collected on the basis of pre-contractual and contractual proceedings will be stored during the legal limitation period of all obligations arising from the conclusion of the contract after its termination (without prejudice of the legal duty to store all the necessary data to invoke limitation).

### Third Party's Data

Whenever the Client provides data from a third party, he should ensure that he is fully authorized to provide such data to CORBROKER, and should communicate how CORBROKER processes data, in the terms of the present Policy.

### Recipients

For the provision of certain services, CORBROKER may employ other entities. Eventually, this provision of services may imply the access, by such entities, to the Client's personal data.

Any controller will process personal data from CORBROKER's Clients, on behalf of CORBROKER, within its instructions.

CORBROKER shall use only processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet all legal requirements, and the subcontracting agreement made with such processors.

CORBROKER is entitled to communicate its Client's personal data to other entities, when such communication is deemed to be necessary and appropriate (i) according to the applicable law, (ii) to comply with legal obligations or court orders, or (iii) to answer demands from public or governmental authorities.

In this regard, CORBROKER is entitled to communicate its Client's personal data to public authorities and regulatory bodies (namely, the Supervisory Authority for insurance and pension funds in Portugal).

In any of the aforementioned situation, CORBROKER commits to undertake all the appropriate measures to guarantee the effective protection of the data processed.

## **Data subject's rights**

In accordance with applicable law, the data subject has the following rights in relation to the process of his or her personal data (which may be exercised through the e-mail: [dpo@corbroker.pt](mailto:dpo@corbroker.pt) ; or through the address: Rua Pedro Monjardino nº 4 – 2ª Esq – 1600 – 892 Lisboa).

### **Right to information:**

Right to receive all the information about the process of his or her personal data in the moment of the collection or, if the data have not been obtained from the data subject, in a reasonable period, unless exceptions foreseen provided in the General Data Protection Regulation, or any other applicable law.

### **Right of access:**

Right to obtain confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: purposes of processing; categories of personal data concerned; recipients of the data; among others.

### **Right to rectification**

Right to obtain without undue delay the rectification of inaccurate personal data concerning him or her.

### **Right to erasure:**

Right to obtain from the controller the erasure of personal data concerning him or her without undue delay, in the terms of applicable law.

### **Right to restriction:**

Right to obtain from the controller restriction of processing, in accordance with the provisions of the General Data Protection Regulation, or any other applicable law.

### **Right to data portability:**

Right to receive the personal data concerning him or her, which he or she has provided, in a structured, commonly used and machine-readable format.

### **Right to object:**

Right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her.

**Right not to be subject to a decision based solely on automated processing:**

Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

**Right to lodge a complaint with a supervisory authority****Cookies**

Please review our [Cookies Policy](#).

**Internacional Transfers**

The provision of services by CORBROKER may imply the internacional transfer of its Clients' personal data to third countries (do not belong to the European Union or to the European Economic Area).

In these cases, CORBROKER

Nesses casos, a CORBROKER will implemente appropriate measures to meet all legal requirements, namely informing the Clients about such transfer.

**Policy Amendments**

CORBROKER reserves the right to, at any moment, make modifications or updates to the present Policy, being these modifications duly updated in all CORBROKER's Platforms. CORBROKER suggests its Clients to regularly consult this Policy.

## COOKIES POLICY

Cookies are small pieces of text used to store information on web browsers. Cookies are used to store and receive identifiers and other information on computers, phones, and other devices.

This policy explains how CORBROKER use cookies and the choices the users have. Except as otherwise stated in this policy, [Personal Data Protection and Privacy Policy](#) will apply to our processing of the data CORBROKER collect via cookies.

CORBROKER is not currently using cookies which allow to identify users, storing only generic information, namely the way or the geographic location of the access and how the users use the website, among others. These Cookies are not collecting personal data.

The majority of the browsers is by default defined to accept cookies, but it is still possible to configure your browser to do the opposite, or to indicate when a cookie is being sent. When you visit the website or application and accept the use of cookies, in a next visit the website or application in our server will recognize your computer or mobile. In this way, when you browse websites or revisit them, in relation to which have already given the consent to use cookies, will not have to indicate again your preferences or insert personal data you have provided before.

CORBROKER uses analytical cookies.

Analytical cookies are anonymously used to the creation of analysis and statistics, with the purpose to enhance the functioning of the website.