Privacy Notice

08 /2026

Colonnade Insurance S.A.'s Hungarian Branch hereby informs data subjects, through this Privacy Notice, about matters related to data processing and the rights of data subjects.

The data controller is **Colonnade Insurance S.A.** (headquarters: 1, Rue Jean Piret, L-2450 Luxembourg), registered with the Registre de Commerce et des Sociétés, Luxembourg, under company registration number B 61605, and licensed by the Grand Duchy of Luxembourg, Ministry of Finance, Commissariat aux Assurances (L-1840 Luxembourg, Offices: 7, Boulevard Joseph II), operating license number: S068/15.

It is represented in Hungary by **the Hungarian Branch of Colonnade Insurance S.A.** (hereinafter: the Insurer) (registered office: 1134 Budapest, Váci út 23-27, company registration number: Budapest Metropolitan Court as the Commercial Registry Court, Cg. 01-17-000942; phone number: (06-1) 460-1400, mailing address: 1426 Budapest, P.O. Box 153, email: ugyfelszolgalat@colonnade.hu).

Contact information for the Data Protection Officer:
email: dpo@colonnade.hu
phone: (06-1) 460-1400
Mailing address: 1426 Budapest, P.O. Box 153

Contents

I. General Terms and Abbreviations

1.1. General Terms

1. Data processing: the processing of personal data (including special categories of data) on behalf of the data controller.

2. Data processor: a natural or legal person that processes personal data on behalf of the data controller.

3. Data processing: any operation or set of operations performed on personal data or data files, whether by automated or non-automated means, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

4. Data Controller: a natural or legal person who, alone or jointly with others, determines the purposes and means of the processing of personal data.

5. Data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data that is transmitted, stored, or otherwise processed.

6. Insurance Confidentiality: any data—not containing classified information— that is available to the insurer, reinsurer, or insurance intermediary and relates to the personal circumstances, financial situation, or business operations of the insurer's, reinsurer's, or insurance intermediary's clients—including the injured party—or to the contracts concluded with the insurer or reinsurer. With regard to insurance secrets, unless otherwise provided by law, a duty of confidentiality applies—without any time limit—to the owners, executives, and employees of the insurer, as well as to all those who have obtained such information in any way in the course of their activities related to the insurer.

Insurance secrets may be disclosed to a third party only if

– the insurance company's client or the client's representative grants written authorization to that effect, specifying precisely the scope of the insurance information that may be disclosed,
– there is no confidentiality obligation under Act LXXXVIII of 2014 on Insurance Activities (hereinafter: Bit.).

7. Data Subject: any natural person who is identified or—directly or indirectly—identifiable based on specific personal data.

8. Special category of personal data:

a) personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic and biometric data intended to uniquely identify natural persons, health data, and personal data concerning a natural person's sex life or sexual orientation;
b) personal data relating to decisions establishing criminal liability, criminal offenses, and related security measures.

9. Customer: the policyholder, the insured, the beneficiary, the injured party, or any other person who has submitted a contractual offer to the insurer and is entitled to the insurer's services.

10. Applicant: Natural persons intending to enter into an employment relationship with an employer.

11. Personal data: any information relating to an identified or identifiable natural person ("data subject"). A natural person is considered identifiable if they can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

1.2. Abbreviations:

Bit: Act LXXXVIII of 2014 on Insurance Activities
Sztv.: Act C of 2000 on Accounting
Grt.: Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Commercial Advertising Activities
Distance Sales Act**:** Act XXV of 2005 on Financial Services Contracts Concluded in the Context of Distance Sales
E-Commerce Act: Act CVIII of 2001 on Certain Issues Concerning Electronic Commerce Services and Services Related to the Information Society
Infotv.: Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information
GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council (also known as the General Data Protection Regulation or GDPR)
Complaints Act: Act XXV of 2023 on Complaints, Reports in the Public Interest, and Rules Governing the Reporting of Misconduct

II. List and Purpose of the Insurer's Data Processing Activities

2.1. Data Processing Related to Visits to the Website

2.1.1. The Insurer does not require the provision of personal data to view information published on the colonnade.hu website, which is accessible to anyone. The Insurer automatically receives the following data about website visitors: the visitor's IP address, the time of the visit, and the subpages and content viewed on the website. The Insurer uses this data exclusively for website-related analysis and to monitor the secure operation of the website.
2.1.2. The Insurer uses so-called "cookies" on its website. Cookies store information related to the use of the website. The purpose of processing the data stored in cookies is to enhance the user experience and improve the website's online services. The cookies used on the website do not store any personally identifiable information. You can disable the storage of cookies in your browser.
2.1.3. The website also contains information accessible exclusively to the Insurer's customers or sales partners. A username and password are required to access these areas. The processing of data displayed in these areas is governed by the data processing rules related to the insurance contract.
2.1.4. On the travel insurance and home insurance sales platforms available on the Insurer's website, a chat window is available to visitors through which designated Insurer employees can provide assistance regarding the product and the underwriting process. Visitors can open the chat window after providing their consent to data processing and specifying how they wish to be addressed. During the chat conversation, visitors are not required to provide additional personal data; however, in order to provide effective assistance and answer questions, the Insurer's employee may request additional personal data from the visitor during the conversation.
2.1.5. Authorized employees of the Insurer are entitled to access chat conversations. You can find information about your rights in this regard in Chapter VIII.

2.2. Data Processing Related to Premium Calculations on the Website

2.2.1. During the premium calculation process on the website, the Insurer processes the data entered in the required fields for the purpose of preparing the premium calculation. If the premium calculation process is interrupted, the Insurer does not save this data.
2.2.2. Data processing resulting from the conclusion of an insurance contract based on a premium calculation is subject to the provisions set forth in the subsection regarding the registration and execution of insurance contracts.

2.3. Data processing related to the registration and execution of insurance contracts and the provision of insurance services

2.3.1. The Insurer is authorized to process its customers' insurance secrets that are related to the insurance contract, its conclusion, its registration, and the provision of services. The purpose of data processing may be the conclusion, amendment, or maintenance of the insurance contract; the assessment of claims arising from the insurance contract; or any other purpose specified in the Insurance Act.
2.3.2. The purposes of data processing include ensuring compliance with economic sanctions imposed by the United Nations, the EU, or other entities, as well as with obligations related to the prevention of money laundering and terrorist financing.
2.3.3. Contracts concluded online through the colonnade.hu website fall under the scope of the Distance Selling Act and the E-Commerce Act; therefore, in addition to the above, another purpose of data processing is to provide evidence of compliance with the consumer information obligations prescribed by these laws, to provide evidence of the conclusion of an insurance contract, to establish a contract for the provision of information society services, to define and modify its content, to monitor its performance, to invoice the fees arising therefrom, and to enforce related claims.
2.3.4. The Insurer's data processing is based on the conclusion of the insurance contract; in the case of data provided during the filing of a claim, the submission of a request for benefits, or a request for information regarding the contract, it is based on voluntary consent deemed to have been given upon submission of the claim or request.
2.3.5. For certain insurance products, the Insurer operates an electronic platform to facilitate the submission by data subjects of documents generated during the establishment and duration of the insurance relationship. The Insurer processes the data subject's name and email address for the purpose of registration and access to the platform.
2.3.6. In order to fulfill a service request (particularly in the case of travel insurance or accident insurance), it may be necessary to process special categories of personal data (health data) pertaining to the insured or another

person.
2.3.7. The data controller may transfer certain personal data between member states of the European Union ("EU") and non-EU countries; such data transfers are subject to the rules set forth in the EU's Standard Contractual Clauses ("SCCs"), or based on the European Commission's adequacy decision pursuant to Article 45 of the GDPR, or under the EU-U.S. data protection framework.
2.3.8. If necessary to protect the vital interests of the insured in connection with the fulfillment of a travel insurance claim, the insurer may transfer health data to countries outside the European Union; the insurer shall inform the data subject of the circumstances of such data transfers at the time of the transfer.
2.3.9. The Insurer, as the data controller, shall transfer the data subject's name, birth name, place and date of birth, and permanent address—from among the personal data collected through the website nnlakas.colonnade.hu, which is used to take out home insurance—to the data controller NN Biztosító Zrt. (1139 Budapest, 4–8 Fiastyúk Street, Company Registration Number: 01-10-041574, hereinafter "NN Insurance"), so that NN Insurance can verify whether the data subject has a valid life insurance policy, in order for the data subject to be eligible for the premium discount offered by the insurer.
2.3.10. The Insurer may use automated decision-making processes based on data provided by the customer (e.g., the insured, the claimant) and through the use of customer profiling. Our algorithms take into account numerous factors, such as customer demographics (e.g., age), current risk trends related to specific insurance coverage, claims history, and other factors. These automated processes may be used in the following contexts:

a) assessing insurance risk, which may influence the range of products offered, the premium rate, or the decision to deny an insurance policy
b) paying claims for certain types of claims, taking into account their approval and the amount of compensation paid
c) compliance with international sanctions, which may affect the ability to enter into an insurance contract or make claims payments.

2.3.11. In order to improve the speed and quality of its quotation, administrative, and claims settlement processes, —including those based on artificial intelligencethe Insurer utilizes . the latest technologies and solutions

2.4. Data Transfer for the Purpose of Protecting the Insured Risk Pool
2.4.1. To safeguard the interests of the insured community, the Insurer—in fulfilling its obligations set forth in the law or undertaken in the contract, to ensure the provision of services in accordance with the law and the contract, and to prevent abuses related to insurance contracts—is authorized, pursuant to the authorization granted in Section 149 of the Insurance Act (Bit.), The request must contain the information necessary to identify the person, property, or property right specified therein, as well as the type of data requested. The request must include the data necessary to identify the person, asset, or property right specified therein, the type of data requested, and a statement of the purpose of the request. The request and its fulfillment shall not constitute a breach of insurance confidentiality.
2.4.2. In this context, the Insurer,

– may request the following data in connection with the fulfillment of accident and health insurance policies:
  a) the identification details of the policyholder, the insured person, and the beneficiary;
  b) information regarding the insured person's health status at the time of enrollment as it relates to the contractual risk;
  c) data regarding previous insurance events—related to a contract falling under the branch specified in this paragraph—involving the persons specified in subparagraph (a);
  d) data necessary for assessing the risk arising in connection with the conclusion of a contract with the requested insurer; and
  e) data necessary to examine the legal basis for the benefits to be provided under the contract concluded with the requested insurer;
– With respect to the performance of insurance policies in the following sectors—land vehicles, rail vehicles, aircraft, vessels, cargo, fire and natural disasters, other property damage, credit, surety and guarantee, various financial losses, legal protection, and assistance—the following data may be requested:
  a) the identification details of the policyholder, the insured, the beneficiary, and the injured party;
  b) the information necessary to identify the insured property, claims, or property rights;
  c) information regarding insured events that have occurred in connection with the property, claims, or property rights specified in subparagraph (b);
  d) the data necessary to assess the risk associated with the conclusion of the contract with the requested

insurer; and
e) the data necessary to examine the legal basis for the services to be provided under the contract concluded with the requested insurer;

– liability related to land vehicles (including carrier liability and compulsory motor vehicle liability insurance), liability related to aircraft, liability related to vessels, as well as the following data regarding the performance of insurance policies falling under the general liability insurance lines:
  a) subject to the prior consent of the injured party, the injured party's identifying information;
  b) the identifying information of the policyholder, the insured, and the beneficiary, as well as the information specified in subparagraphs (b) through (e) of the preceding paragraph;
  c) subject to the prior consent of the injured party, data regarding the health condition of the person asserting a claim for damages due to personal injury or a claim for compensation for infringement of personality rights at the time of data collection, as it relates to the contractual risk;
  d) data not containing personal information regarding previous insurance events—related to a contract falling under the sector specified in this paragraph—concerning the person asserting a claim for damages due to damage to property;
  e) subject to the prior consent of the injured party, data concerning previous insurance events—related to a contract falling within the sector specified in this paragraph—involving the person asserting a claim for compensation for pain and suffering due to personal injury or a violation of personal rights.
– land vehicles (excluding rail vehicles) and liability related to land vehicles (including carrier liability and compulsory motor vehicle liability insurance) in connection with the performance of contracts falling within these insurance lines—the vehicle identification data (license plate number, chassis number)—and, in the case of claims falling under the liability for land vehicles (including carrier liability and compulsory motor vehicle liability insurance) sector, even without the prior consent of the injured party—the Insurer is entitled to request the following information:
  a) information regarding insurance claims involving the specific vehicle, including, in particular, information regarding the date of the claim, the legal basis, the damage to the vehicle, and compensation for such damage, including information on damage that occurred to the vehicle identified by the requesting insurer but was not caused by a motor vehicle;
  b) information regarding the findings of the damage assessment conducted by the insurer concerning the vehicle in question, as well as the amount of the loss.

2.4.3. The insurer contacted by the Insurer is required to provide the Insurer with the data requested in accordance with applicable laws within the deadline specified in the request; in the absence of such a deadline, within fifteen days of receipt of the request.
2.4.4. The Insurer may process the data obtained as a result of the request for ninety days following receipt. If the data that comes to the Insurer's knowledge as a result of the request is necessary for the Insurer to assert its legitimate interests, the duration of data processing specified above shall be extended until the conclusion of the proceedings initiated in connection with the assertion of the claim.
2.4.5. If the data obtained by the Insurer as a result of the request is necessary for the Insurer to assert its legitimate interests, and proceedings related to the assertion of the claim are not initiated within one year of the Insurer becoming aware of the data, the data may be processed for one year following the Insurer's awareness of it.
2.4.6. The Insurer shall notify the customer affected by the request at least once during the insurance period regarding the fact that the request was made for this purpose, the fact that the request was fulfilled, and the scope of the data contained therein. If the customer requests information about their data in accordance with the Act on the Right to Data Self-Determination and Freedom of Information, and the Insurer— in light of the provisions set forth above—no longer processes the data covered by the request, it shall inform the requester of this fact.
2.4.7. The Insurer may not link the data received as a result of the request with any other data that has come to its knowledge or is processed by it—but that does not pertain to the insured's interests—for any purpose other than the one specified above.
2.4.8. The insurer to whom the request is addressed is responsible for the correctness and accuracy of the data provided in response to the request.

2.5. Data Processing Related to Complaints

2.5.1. The Insurer processes personal data obtained in the course of handling complaints in accordance with the provisions of Section 159 of the Insurance Act (Bit.) regarding complaint handling , and maintains records of customer complaints as well as the measures taken to resolve them. Insurer's who are residents of SloveniaWith

regard to the customers the , . the Insurer processes in accordance with the provisions ofpersonal data obtained during complaint handling process ZZavar-1The Insurer's data processing constitutes mandatory data processing based on the provisions of the aforementioned legislation .
2.5.2. In the case of complaint handling by telephone, the Insurer records the telephone communication between itself and the customer. The recording of such calls is mandated by the aforementioned section of the Bit.

2.6. Data processing for the purpose of telephone customer relations and in connection with the sale of insurance products over the phone

2.6.1. The Insurer provides information over the phone in response to questions raised by customers regarding their existing insurance contracts, or at the Insurer's own initiative, and also accepts service and claims requests related to insurance contracts. The Insurer records these conversations. The audio recordings are made for the purposes described in the subsection regarding the registration and execution of insurance contracts.
2.6.2. Certain insurance policies may also be concluded over the phone in accordance with the provisions of the Distance Selling Act. We record telephone communications to demonstrate compliance with the consumer information obligations prescribed by the Distance Selling Act, as well as for the purposes of concluding and subsequently fulfilling the insurance contract, and for the purposes detailed in the subsection regarding the registration and execution of insurance contracts. The recording of voice calls is based on the data subject's consent.
2.6.3. The Insurer analyzes the recordings—including conversations recorded during complaint handling—in order to verify compliance with quality requirements regarding its telephone customer service activities, with the aim of increasing customer satisfaction.

2.7. Cameras Installed in the Insurer's Offices

2.7.1. The Insurer operates a camera system in the following locations, which are indicated by notices. The surveillance system does not record audio.

Camera Number	Room	Monitored area
1.	Reception	The customer area and the reception desk
2.	Entrance No. 1 to the office	The entrance door and surrounding area
3.	The server room	The door to the server room and its surroundings
4.	Entrance No. 2 to the office	The entrance door and surrounding area

2.7.2. The purpose of recording is to protect human life, physical integrity, and personal freedom; to safeguard trade secrets, securities secrets, insurance secrets, to prevent and detect violations of the law, to catch perpetrators in the act, to provide evidence of such violations, to document the circumstances of any accidents occurring in the customer service area, and to protect the insurer's private premises—which are open to the public—as necessary for the performance of its duties.
2.7.3. The processing of data is based on the insurer's legitimate interest.
2.7.4. Authorized employees of the Insurer are permitted to view the recordings at . You can find information about your rights regarding the recordings (requesting information, blocking access, and viewing) in Chapter VIII.

2.8. Data processing for direct marketing purposes

2.8.1. The Insurer's direct marketing activities include any informational activities conducted through direct outreach methods, the purpose of which is to convey commercial advertising, as defined by the Grt., to consumers or business partners. We process data for this purpose, in particular, in the context of the following activities:

- in the case of certain sweepstakes, among participants in the sweepstakes;
- during preliminary needs assessments related to insurance and financial products and services, either directly or through the involvement of insurance brokers;
- as part of sending electronic and printed newsletters;
- as part of sending targeted advertising mailings;
- during telephone sales campaigns.

2.8.2. The scope of data processed for direct marketing purposes includes, in particular: name, phone number, and email address.
2.8.3. The purpose of processing the data is to enable the Insurer to initiate business solicitation contacts via , by

telephone, or through other means of communication, and to send commercial advertisements to the data subject.
2.8.4. Source of the data: the data subject themselves, or third parties from whom the Insurer obtains personal data—either free of charge or for a fee—pursuant to contracts, for the purpose of using the obtained data for direct marketing.
2.8.5. The scope of the processed data and information is contained in the written and electronic statements used to collect the data and standardized for the specific direct marketing activity; in the case of data processing consents provided over the phone, it is contained in the audio recordings of the telephone conversations.
2.8.6. The processing of data regarding the Insurer's existing customers—that is, natural persons with whom the Insurer has had or currently has a contractual relationship—is based on the Insurer's legitimate interest. The processing of data regarding natural persons who are not existing customers is based on the consent of the data subjects. The Insurer may also carry out the collection of data through insurance brokers with whom it has a contractual relationship.
2.8.7. The Insurer, as the data controller, collects the data subjects' consent through the website nnlakas.colonnade.hu, which is used to purchase home insurance, so that NN Insurance, as the data controller, may process the data subjects' data for business acquisition purposes and create profiles of the data subjects in order to recommend products best suited to them. If the data subject grants consent, the Insurer will transfer the data subject's name, ZIP code, email address, phone number, date of birth, the date on which consent was granted, and unique identifier to NN Insurance.
2.8.8. Information regarding the right to object to data processing for direct marketing purposes is provided in Section III, Point 3.7.

2.9. Data Processing for the Purpose of Organizing Sweepstakes and Promotions

2.9.1. The purpose of data processing is to conduct sweepstakes organized by the Insurer.
2.9.2. The scope of the data processed includes, in particular: name, phone number, email address, residential address, place and date of birth.
2.9.3. Any additional data processed, depending on the specific contest, is contained in the paper-based or electronic forms used to collect the data, as well as in the registration interfaces of the relevant IT applications.
2.9.4. The Insurer's data processing is based on the data subject's voluntary consent.
2.9.5. The Insurer may, in certain cases, engage third parties to administer the prize drawing. Third parties engaged by the Insurer for this purpose are considered data processors of the Insurer. The Insurer provides information regarding the identity of the data processors in the rules of the specific prize drawing.

2.10. Processing of Data of Job Applicants

2.10.1. The Insurer processes the personal data contained in resumes received directly or through a recruitment agency, as well as in any attached documents, for the purpose of notifying the data subject of job opportunities that best match their qualifications and interests, scheduling an appointment with the data subject, and conducting the selection process.
2.10.2. These data processing activities are based on the data subject's voluntary consent, which the data subject provides by submitting the data.

2.11. Data Processing Related to Social Media

2.11.1. The Insurer, like other users of the social media platforms it uses, may access the data subject's personal data shared on those platforms, such as the data subject's name and profile picture.
2.11.2. If the data subject decides to link the social media platform used to follow the Insurer to another social media platform operated by a different social media service provider, the Insurer may also access the personal data shared by the data subject and their contacts on the latter platform.
2.11.3. However, when using social media platforms, the Insurer does not collect personal data shared on such platforms for its own purposes and uses such data under the same conditions as any other user of the platform.

2.12. Data Processing Related to the Reporting of Misconduct

2.12.1. The Insurer's data processing is based on the operation of a mandatory internal fraud reporting system pursuant to Section 18(1) of the Complaints Act.
2.12.2. Within the framework of the internal fraud reporting system, the Insurer
a) to the reporter,
b) the person whose conduct or omission gave rise to the report, and
c) the person who may have relevant information regarding the contents of the report,

processes the personal data essential for investigating the report solely for the purpose of investigating the report and remedying or ceasing the conduct that is the subject of the report.
2.12.3. Only the Insurer's authorized employees (compliance officer, risk manager) are entitled to full access to the personal data contained in the report. For the purpose of investigating the report, employees of other organizational units of the Insurer may access the personal data related to the report only to the extent necessary for the investigation of the report.

2.12. Other Data Processing Activities

2.12.1. With the data subject's prior consent, the Insurer may process personal data for other purposes as well. The Insurer shall inform data subjects of such data processing activities at the time the data is collected for the specified purpose.

III. Duration of Data Processing

3.1. Cookies placed on the user's computer while visiting the website may be deleted at any time, or the user may disable cookies in their browser. The Insurer retains chat conversations for five years from the date of the conversation.
3.2. When processing data falling within the scope of insurance confidentiality, the Insurer may process personal data—including data directly related to health status—for the duration of the insurance relationship and for as long as a claim may be asserted in connection with the insurance relationship. The Insurer may process personal data related to an insurance contract that was not concluded for as long as a claim may be asserted in connection with the failure to conclude the contract, but for no longer than 5 years from the date the data was provided. The Insurer shall retain documents qualifying as accounting records that were generated in connection with the conclusion and registration of the insurance contract, as well as in connection with the provision of insurance services, for 8 years pursuant to Section 169 of the Accounting Act.
3.3. The Insurer processes data obtained from other insurers through the exchange of data among insurers in accordance with the conditions and for the duration specified in the section titled "Protection of the Insured Risk Community."
3.4. The Insurer retains audio recordings made during the handling of complaints for five years. The Insurer retains the complaint and the response to it for five years and presents them upon request by the authorities. For customers the audio recordings three residing in Slovenia, the Insurer retains foryears.
3.5. In the case of data processing for telephone customer service and sales purposes, the Insurer shall store the voice recordings for the same period as that applicable to data processing for insurance purposes.
3.6. Unless otherwise used, camera recordings from monitored areas are stored for 7 days. The Insurer stores the recordings at its headquarters.
3.7. The Insurer processes data collected for the purpose of direct marketing until the termination of the contract. The data subject may, at any time, without providing a reason and free of charge, opt out of receiving advertisements sent via direct contact by using the link provided in such messages or by contacting the Insurer.
3.8. The Insurer will process the personal data provided by participants for the purpose of participating in sweepstakes for a period of 5 years from the date the data is provided.
3.9. The Insurer retains reports of abuse, investigation documentation, and written notifications to the reporter for 5 years from the date the report is received.
3.10. The Insurer processes contact information provided by job applicants for the purpose of informing them about career opportunities for 2 years from the date of submission or until the data subject withdraws their consent. The statement of withdrawal may be sent to the Insurer via email or by regular mail. Following the withdrawal of consent, the Insurer will no longer contact the data subject regarding career opportunities. The Insurer will retain the data provided by job applicants for a period of 2 years for the purposes of the selection process and to prevent any unfounded claims arising from the failure to establish an employment relationship. If an employment relationship is established, the contractual and statutory provisions governing that employment relationship shall apply to the processing of the data and documents.

IV. Legal Bases for Data Processing

4.1. The legal basis for processing personal data provided in connection with fee calculations, communications via the website, reviews, and chat conversations is the consent of the data subjects.
4.2. The legal basis for data processing related to the conclusion, management, and record-keeping of insurance contracts—including the conclusion of insurance contracts electronically or by telephone—as well as the operation of the electronic platform operated by the Insurer for certain insurance products and data processing

for telephone customer service purposes, is the performance of the contract concluded between the Insurer and the data subject.
4.3. The legal basis for the transfer of data to NN Insurance is the consent of the data subjects.
4.4. The legal basis for data processing for the purpose of protecting the insured risk pool is Section 149 of the Insurance Act.
4.5. The legal basis for data processing for the purpose of complaint handling is Section 159 of the Insurance Act (Bit). For customers residing in Slovenia it is the ZZavar-1 ,Act.
4.6. The legal basis for processing camera recordings installed in the customer service area and data recorded during entry into the building is the Insurer's legitimate interest.
4.7. The legal basis for data processing for the purpose of direct marketing is the Insurer's legitimate interest in the case of the Insurer's existing customers. The legal basis for data processing in the case of natural persons who are not existing customers is the consent of the data subjects
4.8. The legal basis for processing the data of participants in sweepstakes is the consent of the data subjects, as well as Section 169 of the Accounting Act.
4.9. The legal basis for processing the data of job applicants is the consent of the data subjects.
4.10. In cases where compliance with economic sanctions (embargoes) imposed by the UN, the EU, or other entities must be ensured, the legal basis for data processing is the Insurer's legitimate interest or the fulfillment of a legal obligation applicable to the Insurer.
4.11. The Insurer processes health-related data in accordance with Act XLVII of 1997 on the Processing of Health and Related Personal Data, as well as the provisions of Section 136 of the Insurance Act, with the data subject's written consent.
4.12. The legal basis for data processing in connection with reports of abuse is Section 18(1) of the Complaints Act.
4.13. The legal basis for data processing carried out using including,intelligence—is the Insurer's legitimate interestthe latest technologies and solutions—, among others artificial , which Insurer's business is based onproviding conducting theactivities in the most efficient manner, competitivenessensuring, and to customers fast and high-quality services .

V. Persons Entitled to Access the Data

5.1. Personal data and information classified as insurance secrets may be accessed by the Insurer's employees who have access rights related to the relevant data processing purpose, by authorized insurance intermediaries, and by individuals and organizations performing data processing or outsourced activities for the Insurer under service contracts, to the extent specified by the Insurer and to the extent necessary for the performance of their activities. In the case of joint data processing, information regarding the identities of the additional data controllers is provided in the description of the specific data processing purposes. Data classified as insurance secrets may also be disclosed to any persons or organizations that are not subject to the obligation to maintain insurance secrecy pursuant to Chapter X of the Insurance Act.
5.2. In the course of data processing, the Insurer engages data processors and service providers performing outsourced activities on its behalf, pursuant to service agreements entered into for this purpose. In this regard, the Insurer ensures compliance with the provisions of the ÁAR.

VI. Provisions Regarding the Maintenance of Insurance Confidentiality

6.1. With regard to insurance confidentiality, and without any time limitation—unless otherwise provided by law—a duty of confidentiality applies to the Insurer's owners, executives, employees, and all those who have obtained such information in any way in the course of their activities related to the Insurer.
6.2. Insurance secrets may be disclosed to a third party only if:
– the insurance company's client or the client's representative grants a written waiver, precisely specifying the scope of the insurance secrets that may be disclosed,
– there is no obligation of confidentiality under Chapter X of the Insurance Act.

VII. Rights Related to Data Processing and Their Enforcement

The rights of data subjects include the following:
a) to request access to their personal data from the data controller,
b) request the rectification and supplementation of their personal data,
c) request the erasure of their personal data or the restriction of its processing,
d) object to the processing of their personal data,
e) you may file a complaint with the competent data protection supervisory authority (NAIH),

f) you have the right to data portability,
g) request an explanation for an automated decision and challenge such a decision, and
h) request that the use of your personal data for direct marketing purposes be prohibited.

a) Upon the data subject's request, the Insurer shall, as soon as possible after the request is submitted—but no later than 15 days—provide the data subject with written information regarding the data subject's personal data processed by the Insurer or its data processor:

- the categories of personal data and their sources;
- the purpose and legal basis of data processing;
- the planned duration of the storage of personal data, or, if this is not possible, the criteria for determining that duration;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed; the name, address, and activities related to data processing of any data processor engaged;
- the data subject's right to request the rectification or erasure of their personal data, to restrict the processing of such data, and to object to the processing of such personal data;
- the right to lodge a complaint with the supervisory authority;
- in the event of a transfer of the data subject's personal data, the legal basis for the transfer and the recipient of the data.

This information is provided free of charge if the data subject has not yet submitted a request for information regarding the same set of data in the current year. In other cases, a reasonable fee based on administrative costs may be charged.

In addition to the above, the Insurer shall, at the data subject's request, provide a copy of the personal data being processed.

b) The data subject has the right to have the Insurer, upon request and without undue delay, correct or complete any inaccurate personal data concerning him or her.

c) The Insurer shall erase personal data concerning the data subject without undue delay if

- the personal data is no longer necessary for the purpose for which it was collected, or
- the data subject withdraws the consent on which the processing is based, and there is no other legal basis for the processing,

unless the processing of the data is necessary for the establishment, exercise, or defense of legal claims, or for compliance with a legal obligation.

The Insurer shall erase personal data concerning the data subject without undue delay if the personal data must be erased to comply with a legal obligation applicable to the data controller, or if the personal data was collected in connection with the offering of information society services as referred to in Article 8(1) of the ÁAR.

The data subject has the right to request that the Insurer restrict data processing if any of the following conditions are met:

- the data subject disputes the accuracy of the personal data; in this case, the restriction applies for a period enabling the data controller to verify the accuracy of the personal data;
- the data processing is unlawful, but the data subject opposes the erasure of the data and instead requests that its use be restricted;
- the data controller no longer needs the personal data for the purposes of processing, but the data subject requires it to assert, exercise, or defend legal claims; or
- the data subject has objected to the processing; in this case, the restriction applies for as long as it remains to be determined whether the data controller's legitimate grounds override those of the data subject.

Data subject to such restriction may be processed, with the exception of storage, only with the data subject's consent, or for the purpose of asserting, exercising, or defending legal claims, or for the protection of the rights of another natural or legal person, or for reasons of substantial public interest of the Union or of a Member State. The data controller shall inform the data subject, at whose request the processing was restricted, in advance of the lifting of the restriction.

d) If the processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, the data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data, including profiling based on those provisions. In this case, the Insurer may no longer process the personal data unless it demonstrates that the processing is justified by compelling legitimate grounds that override the data subject's interests, rights, and freedoms, or that are related to the establishment, exercise, or defense of legal claims. The Insurer shall review the objection as soon as possible after its submission, but no later than 15 days, make a decision regarding its merits, and notify the data subject of its decision in writing at .

Data subjects may submit their objections or requests regarding the processing of their personal data to the Insurer verbally (in person) or in writing (including via email) using the following contact information:
Colonnade Insurance Data Protection Officer
Email: dpo@colonnade.hu
mailing address: 1426 Budapest, P.O. Box 153.

e) If you have been unable to resolve your objection, complaint, or request regarding your personal data in a satisfactory manner, or if you believe at any time that your rights have been infringed upon or are at immediate risk of infringement in connection with the processing of your personal data, you are entitled to file a report with the following authorities:
National Authority for Data Protection and Freedom of Information
Headquarters: 1055 Budapest, Falk Miksa Street 9-11
Mailing Address: P.O. Box 9, 1363 Budapest
Phone: (+36) 1391 1400
Fax: (+36) 13911410
Email: ugyfelszolgalat@naih.hu
Website: naih.hu

The insurer's primary supervisory authority under the ÁAR is the Commission nationale pour la protection des données. Registered office and mailing address: 1, Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Luxembourg; Website: cnpd.public.lu

In the event of a violation of your rights regarding the protection of your personal data, you have the right to bring a lawsuit. The court has jurisdiction over the case. The lawsuit may be filed—at your discretion—before the court in your place of residence or place of stay.

f) The data subject has the right to receive the data concerning him or her in a structured, commonly used, and machine-readable format, and has the right to transmit this data to another data controller without hindrance from the data controller to whom the personal data was provided. If technically feasible, the data subject may request the direct transfer of personal data between data controllers.

g) The customer and any other data subject have the right to contact the Insurer and request an explanation regarding an automated decision or to challenge such a decision.

VIII. Other Information

8.1. Processing of Data Related to a Deceased Person
The processing of data related to a deceased person is governed by the legal provisions regarding the processing of personal data. With respect to data that can be linked to the deceased person, the rights of the data subject may also be exercised by the deceased's heir or the beneficiary named in the insurance contract.
8.2. Other Data Processing Activities
If the Insurer provides information regarding personal data to the authorities listed in Section 138 of the Insurance Act, it shall also inform the data subject at the time of disclosure of the legal basis for the data transfer and the recipient thereof. The Insurer shall not inform the data subject of data transfers carried out pursuant to Section 138(1)(b), (f), and (j) or Section 138(6) of the Bit.
The data controller shall disclose personal data to the authorities—provided that the authority has specified the exact purpose and scope of the data—only to the extent necessary to fulfill the purpose of the request.
8.3. Special Provisions Regarding Camera Recordings
8.3.1. Right to Request Information

Within five days of the recording being made, you may request information from the data protection officer regarding what is visible in the recording in connection with you. In your request, you must specify where and when the recording was made, and how you can be identified in it. The Insurer will comply with the request within 25 days.

8.3.2. Right to Restriction of Processing

Within five days of the recording's creation, you may request—by demonstrating your right or legitimate interest—that the data controllers not destroy or delete the data (blocking). In your request, you must specify where and when the recording was made, how you can be identified in it, and the reason for requesting the blocking. Please note that it is advisable to initiate the necessary administrative or judicial proceedings at the same time as requesting the blocking, as we will only disclose the recordings in response to a request from an administrative authority or a court.

8.3.3. Right of Access

You may request access to recordings made of you within five days of the recording's creation. In your request, you must specify where and when the recording was made, how you can be identified in it, and on which day you wish to view the recording. Please note that we can accommodate requests for viewing on business days, Monday through Friday, between 9:00 a.m. and 4:00 p.m.

8.4. Access to Chat Conversations

After the conversation has ended, you may immediately request that a copy of the conversation be sent to the email address you provided by selecting the "Send Text" option in the chat window menu.

If you did not request a copy of the conversation after it ended, you may later request a copy from the Insurer's data protection officer using the contact information provided in this notice.

8.5. **Reporting a Data Breach to the Supervisory Authority and Notifying the Data Subject**

The data controller shall report the data breach to the competent supervisory authority without undue delay and, where feasible, no later than 72 hours after becoming aware of the data breach, unless the data breach is unlikely to have posed a risk to the data subject's rights and freedoms. The data controller shall maintain a record of data breaches, noting the facts relating to the data breaches, their effects, and the corrective measures taken. The data controller shall notify the data subjects of the data breach without undue delay if the data breach is likely to pose a high risk to the data subjects' rights.

In addition to the above, the Data Controller will take all possible steps to resolve the data breach as effectively as possible and to ensure the fullest protection of personal data.

8.6. Information Regarding Data Transfer in the Case of Online Payments

If the customer pays the insurance premium by selecting the online payment option on the insurer's website, the customer thereby acknowledges that their personal data (name, email address, address, phone number) stored in the user database of https://colonnade.hu or https://colonnade.nopa.hu by the insurer, as the data controller, will be transferred to OTP Mobil Kft., as the data processor. The nature and purpose of the data processing activities carried out by the data processor are described in the SimplePay Privacy Policy, which can be viewed at the following link: http://simplepay.hu/vasarlo-aff.