



AAS „BTA Baltic Insurance Company“
filialas Lietuvoje

BTA PRIVACY POLICY

Definitions and concepts
Valid from 11 December 2023.

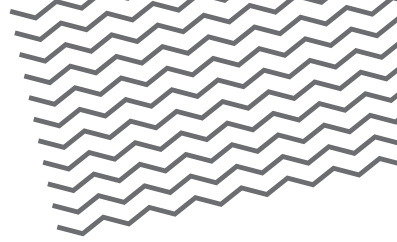


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1. CONCEPTS

Client shall refer to a person who intends to make an insurance or reinsurance contract or who is a policyholder under the insurance contract or a reinsuring party under the reinsurance contract.

Personal data shall refer to any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by an identifier such as name and surname, personal identification number, location data and internet identifier or by one or more physical, physiological, genetic, mental, economic, cultural or social characteristics of that natural person, including any data on insurance or benefits for natural persons, BTA employees and cooperation partners.

Processing shall refer to any operation or sequence of operations on personal data or sets of personal data by automated or non-automated means, such as collection, recording, sorting, systematisation, storage, adaptation or modification, retrieval, access, use, disclosure by transmission, distribution or otherwise creating a possibility to use them, as well as collation or merging with other data, restriction, deletion or destruction.

Processor shall refer to a natural person or legal entity, power authority, agency or other institution that processes personal data on behalf of the data controller.

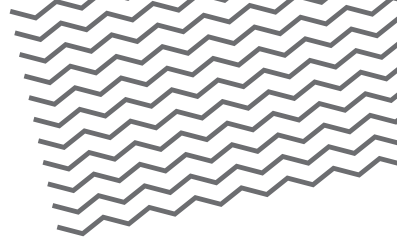
EU/EEA shall refer to the European Union and the European Economic Area.

LMIB shall refer to the Motor Insurers' Bureau of the Republic of Lithuania.

REGITRA shall refer to state enterprise "Regitra".

VTIC shall refer to vehicle technical inspection centres.

VIG shall refer to "Vienna Insurance Group AG".



IT shall refer to information technologies.

System shall refer to personal data processing system, which is a structured cluster of personal data recorded in any form accessible according to relevant criteria for personal identification, such as an insurance risk information system, a personnel management or accounting system.

GDPR shall refer to regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

CMTPLI shall refer to compulsory motor third party liability insurance.

2. INFORMATION ABOUT THE DATA CONTROLLER

The controller of the processed personal data is "BTA Baltic Insurance Company" AAS (hereinafter referred to as – BTA) branch in Lithuania, code 300665654, legal address: Laisvės pr. 10, Vilnius, LT-04215, Lithuania.

BTA may be contacted by email: bta@bta.lt or at the legal address indicated above.

3. PURPOSE OF THE DOCUMENT

This BTA privacy policy (hereinafter referred to as – Policy) describes the main principles of personal data processing. More detailed information about the personal data processing may be indicated in the contracts and other documents related to the insurance services.

4. GENERAL INFORMATION

4.1. BTA, in compliance with the effective legislation, ensures the confidentiality of Personal Data and applies respective technical and organizational means to protect the Personal Data from unauthorized access, processing or disclosure, unintentional loss, modification or loss.

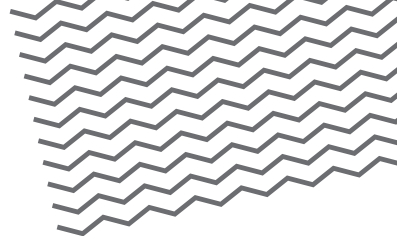
4.2. For the processing of personal data, BTA may employ Processors with whom data processing contracts have been made. In such cases, BTA shall take all steps necessary to ensure that such Processors process Personal Data under BTA instructions and in accordance with the effective legislation and shall demand that the respective security measures be applied.

4.3. BTA receives Personal Data for the purpose of providing insurance services to Clients and fulfilling legal obligations, as well as in order to ensure legitimate interests. Personal data is necessary for BTA to provide the insurance services to the Client, therefore, if the Client refuses to provide the required data, such non-provision of data may prevent the commencement of insurance business relations or the further performance of the insurance contract. Personal data may also be obtained on the basis of the Client's consent in order to provide better offers or insurance conditions to the Client.

5. CATEGORIES OF PROCESSED PERSONAL DATA

The following Personal Data categories are collected and processed by BTA:

- 5.1. Identification data, such as name, surname personal code, date of birth;
- 5.2. Contact information, such as address, place of residence, phone number, email;

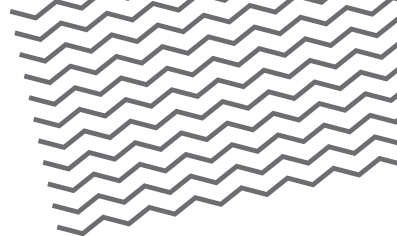


- 5.3. Data on insurance objects, such as real estate address, vehicle data;
- 5.4. Data on business transactions, such as bank account number, amount of the paid insurance contribution;
- 5.5. Data on financial reliability, such as compliance with payment deadlines with respect to BTA or other persons;
- 5.6. Data on the incurred damages, such as information on the amount of damage, evaluation of remedial costs;
- 5.7. Investigation data, such as data that enable BTA to conduct an investigation of the Client's activities in accordance with the prevention of terrorist financing and to ensure the enforcement of international sanctions, including for the purpose of cooperation;
- 5.8. Data obtained or created in the performance of legal obligations, such as data when BTA is obliged to provide them to tax institutions, courts or law enforcement authorities;
- 5.9. Communication and mobile device data, such as data contained in emails, audio records and other means of communication, as well as information collected when visiting the BTA website, if the Client visits the BTA website or uses its mobile application;
- 5.10. Data on client satisfaction with the services provided, such as responses to survey questions about the quality of the insurance services provided;
- 5.11. Data on relationships with legal entities, such as information from healthcare institutions or repair companies that have provided the Client with the services which BTA has to pay;
- 5.12. Client risk assessment;
- 5.13. Data of special categories are data of health and medical examinations to provide, for example, personal insurance, travel or CMTPLI services.

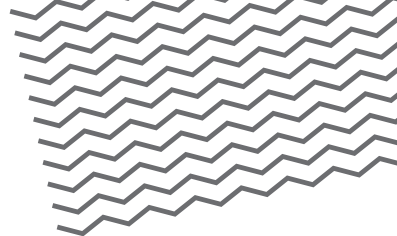
6. PURPOSES AND LEGAL GROUNDS OF PERSONAL DATA PROCESSING

BTA processes Personal Data with the following personal data processing purposes and under the following legal grounds:

Purposes of personal data processing	Legal grounds of personal data processing
1. Provision of insurance services, for example, identification of the Client in order to prepare an insurance offer, conclusion and performance of an insurance contract, settlement of an insured event	- Art. 6 (1) (b) of GDPR. - Art.9 (2) (g) of GDPR. - Section 5 of the Law on Insurance. - Art. 17 (4) of the Law on CMTPLI.
2. Ensuring the remote consultation service of a doctor, remote ordering of medicines	- Art 6 (1) (b) of GDPR 6 str. - Art 9 (2) (a) of GDPR



<p>3. Risk management, such as detection and prevention of cases of swindling, management of complaints and offers, incident management and performance of legal obligations provided for in the Law on the Prevention of Money Laundering and Terrorist Financing, compliance with legal acts regulating international and national sanctions applied in the Republic of Lithuania.</p>	<ul style="list-style-type: none">- Art. 6 (1) (c), (f) of GDPR.- Law on Insurance- Art. 98 (4) of the Law on Insurance.- Art. 95 of the Law on Insurance.- Section 5 of the Law on Insurance.- Art. 6.994, 6.1001 (3, 4) of the Law on Insurance.- Art. 4 of Section 3 of the Law on the Prevention of Money Laundering and Terrorist Financing.- Art. 4, Art. 9 of the Law on the Implementation of Economic and Other International Sanctions.- Art. 3 (1) of the Law on the Legal Protection of Personal Data.- Art. 4 of the Law on the Protection of Whistleblowers.
<p>4. Personnel management, organization of work procedures, day-to-day accounting operations, such as staff selection, conclusion and performance of employment contracts, organization of work safety measures, record keeping and accounting, avoidance of conflicts of interest.</p> <ul style="list-style-type: none">- Art. 6 (1) (a), (b), (c), (f) of GDPR.- Art. 9 (2) (b) of GDPR.- Part 2 of the Labour Code.- Part 4 of the Labour Code.	<ul style="list-style-type: none">- Art. 120 of the Labour Code.- Section 9 of the Labour Code.- Section 11 of the Labour Code.- Law on Insurance- Law on Income Tax- Law on State Social Insurance
<p>5. Organization of working procedures, including protection of premises, prevention and detection of criminal offenses, taking into account the protection of property and existential personal interests, security of information systems and computer networks, maintenance of IT systems, organization of dispatch and receipt of supplies.</p>	<ul style="list-style-type: none">- Art. 6 (1) (c), (f) of GDPR.
<p>6. Accounting – daily operations.</p>	<ul style="list-style-type: none">- Art. 6 (1) (c) of GDPR.- Law on Accounting.- Law on Residents' Income tax.- Labour law.
<p>7. Preparation of special offers of BTA and BTA cooperation partners, such as organization of lotteries, sending commercial messages, conducting Client surveys, analysis of website visits.</p>	<ul style="list-style-type: none">- Art. 6 (1) (a), (f) of GDPR.- Art. 69 (2) of the Law on Electronic Communications.
<p>8. Conducting customer surveys in order to determine the quality of services provided by BTA</p>	<p>Art. 6 (1) (f) of GDPR</p>
<p>9. Receipt and provision of insurance intermediary services, such as concluding and executing an insurance contract with the help of insurance brokers or intermediaries of additional insurance activities.</p>	<ul style="list-style-type: none">- Art. 6 (1) (c) of GDPR.- Section 7 of the Law on Insurance.



10. Implementation and protection of rights and legitimate interests	<ul style="list-style-type: none">- Art. 6 (1) (c), (f) of GDPR.- Art. 9 (2) (f) of GDPR.- Law on Insurance.- Civil law.- Criminal law.
11. Cooperation with other legal entities, for example, provision of insurance services in a health care institution, repair company, or in another institution chosen by the Client.	<ul style="list-style-type: none">- Art. 6 (1) (b), (f) of GDPR.
12. Collection of statistical data, such as data on the insurance services provided, the claims to pay the insurance benefit and the insurance benefits paid.	<ul style="list-style-type: none">- Art. 6 (1) (b), (c) of GDPR.
13. Recording of telephone conversations to ensure the quality of insurance services and facilitate dispute resolution.	<ul style="list-style-type: none">- Art. 6 (1) (b), (c) of GDPR.- Law on Electronic Communications

7. PERSONAL DATA ACQUISITION METHODS

BTA collects and may receive Personal Data in one of the following ways:

7.1.1. from the Client during the process of making the contract, indicating the Personal Data of the policyholder, the insured or the beneficiary;

7.1.2. from appeals, correspondence email, telephone conversations or other means confirming the Client's communication or cooperation with BTA;

7.1.3. from the Client, if he submits a request to pay the insurance benefit;

7.1.4. from the Client's authorization on the BTA portal or mobile application;

7.1.5. from external sources, such as public or private registers, including the LMIB, when calculating the insurance contribution for transport insurance;

7.1.6. from any medical institution or from any doctor of medical practice, having received information about the Client's health and the medical assistance received by the Client, if such information from the medical institution or doctor is necessary to clarify the circumstances of a possible insured event reported to the Client. BTA, for the acceptance or delivery of the decision to pay the insurance benefit, for the determination of the amount of the insurance benefit, but only as much as it is necessary, for the examination of damages for accidents, travel, MTPL.

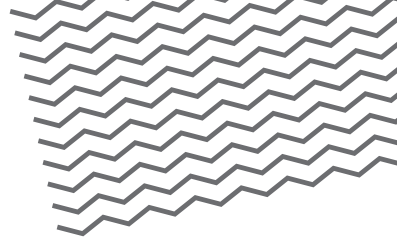
7.1.7. from business partners, insurance intermediaries, persons paying insurance contributions, managers of insurance objects, claimants, as well as natural persons related to BTA clients - legal entities, such as: shareholders, board members, company representatives, procurators, real beneficial owners;

7.1.8. from law enforcement authorities;

7.1.9. from candidates applying for a job;

7.1.10. from the „cookies“ of the BTA website;

7.1.11. or otherwise, in accordance with the legal grounds for the processing of Personal Data.



8. PERSONAL DATA PROTECTION

8.1. BTA provides, constantly reviews and improves the Clients' Personal Data Protection measures against unauthorized access, unintentional loss, disclosure or damage. To achieve these goals, BTA uses modern technologies, technical and organizational tools, including the use of firewalls, intrusion detection, analysis software and data encryption.

8.2. Before concluding the cooperation agreement and during its effective period, BTA shall carefully check all service providers that process BTA Clients' Personal Data for BTA's benefit and assess whether such cooperation partners (Personal Data Processors) apply sufficient security measures to ensure the processing of Client's Personal Data in accordance with BTA security requirements as well as the requirements of the legislation governing the insurance sector. Such processors of Personal Data are prohibited from processing Personal Data for purposes other than those provided for in the cooperation agreements, unless so required by the requirements of legal acts.

8.3. BTA shall not be liable for unauthorized access to or loss of Personal Data if it is beyond BTA's control, nor shall it be liable for improper processing of Personal Data if, for example, the Client has provided inaccurate data for further communication or has not deleted his personal information when transmitting data to BTA through the data transmission intermediaries, which he himself had chosen.

9. CATEGORIES OF PERSONAL DATA RECIPIENTS

According to the requirements of the effective legal acts, BTA has the right to transfer the Client's personal data to the following entities:

9.1. VIG group companies - to process personal data for the purposes specified by BTA and in accordance with bilateral agreements.

9.2. Persons with whom BTA cooperates - to perform insurance contracts or ensure the continuity of its activities or functions, including reinsurance companies, but only to the extent necessary to achieve the specified purpose.

9.3. Persons who provide control and collection services with respect to insurance contributions or other payments not paid by the BTA policyholder in a timely manner under the insurance contract - but only to the extent necessary to achieve the set purpose.

9.4. Financial service providers for whose benefit the insurance contract has been concluded, for the purpose of informing them about the terms of the insurance contract, the validity of the insurance contract and the settlement of insurance claims, but only to the extent necessary to achieve the set purpose.

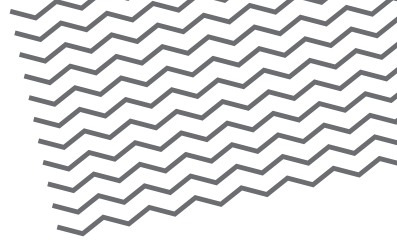
9.5. The information system for compulsory motor third party liability insurance, managed by the LMIB, when REGITRA, VTIC and BTA, which sent the data to REGITRA, are responsible for the accuracy, integrity and availability of the relevant data within the scope established by the legal acts regulating compulsory motor third party liability insurance.

9.6. Other partners involved in the provision of BTA services, such as IT partners, archiving, postal service providers, providers of emailing services and providers of services to BTA clients - medical institutions, sports clubs, pharmacies, opticians' shops.

9.7. Law enforcement authorities, such as the police, a court, or another state or municipal institution, in the exercise of their statutory functions.

9.8. BTA IT infrastructure technical and System support teams, such as IT solution developers who act as Personal Data Processors.

9.9. To other insurance companies, in order to reduce the risk of the insurer's activities and prevent fraud, as well as to exchange information about policyholders, insured persons, valid insurance contracts for the purposes and scope determined in regulatory acts.



10. PERSONAL DATA PROCESSING TERRITORY

10.1. According to legal acts, Personal Data may be processed in Lithuania and EU / EEA Member States and non-EU / EEA Member States in cases where it is necessary to settle the damage or in case of choosing an IT solution.

10.2. The transfer and processing of Personal Data outside the EU / EEA is possible if there is a legal basis for it and appropriate security measures have been taken to ensure the protection of Personal Data in accordance with the level of personal data protection guaranteed in Lithuania or the EU / EEA.

10.3. In the event of a insured event, personal data may be transferred for processing outside the EU/EEA if the event occurred to a Customer located in a relevant country outside the EU/EEA, if this is necessary for the provision of assistance, including services related to the Customer's health.

11. DATA STORAGE PERIOD

11.1. Personal data shall be processed for as long as is necessary to achieve the specific purpose for which the personal data are processed. The storage period shall be considered reasonable as long as at least one of the following conditions is met:

11.1.1. Personal data necessary for the performance of a contractual obligation shall be kept until the end of the performance of the contract and as long as the criterion of the storage period is maintained.

11.1.2. Personal data that must be kept in compliance with the legal requirements must be kept for a period provided for in the relevant legal requirements, for example, primary accounting documents must be kept for at least 5 years;

11.1.3. Data confirming the fulfilment of obligations are stored in accordance with the limitation period provided for in the legislation.

11.2. BTA deletes and anonymises redundant or unnecessary Personal Data. The Client has the right to refuse that his/her Personal Data be processed up to the limits provided by legal acts by informing BTA in a written statement, provided that the processing of Personal Data is not related to BTA's obligations under legal acts.

12. CLIENT'S RIGHTS AND OBLIGATIONS

BTA takes care of the implementation of the following Client rights:

12.1. Right of access to the personal data

BTA shall provide the Client with an opportunity to get acquainted with the processed personal data of him / her by submitting a written request to BTA.

12.2. Right to request correction of data

Upon receipt of a reasoned request from the Client to correct the data, BTA shall immediately correct the inaccurate and / or supplement incomplete Personal Data, taking into account the purposes of data processing.

12.3. Right to object to the processing of his / her Personal Data on the basis of consent

BTA shall give the Client the opportunity to revoke his / her consent to process his / her Personal Data and immediately terminates the processing of the Client's Personal Data upon receipt of the relevant request of the Client.

12.4. Right to have personal data deleted (right to be „forgotten“)

BTA shall ensure that, at the Client's request, his / her Personal Data is deleted, for example, when the



Client's Personal Data is processed on the basis of the Client's consent, which the Client revokes. This provision does not apply in cases when BTA processes the Personal Data that the Client requests to be deleted on another legal basis, for example, on the basis of legal requirements. BTA evaluates each case individually and provides the Client with a motivated and detailed answer.

12.5. The right to lodge a complaint regarding automatic data processing

BTA performs automated processing of Personal Data in the form of Health Insurance, calculating insurance benefits without the participation of employees. The Customer has the right to demand that BTA perform a manual recalculation of insurance benefits if the Customer reasonably suspects that the automatically calculated insurance benefit is incorrect.

12.6. The right to portability of Personal Data

After receiving a reasoned request from the Customer in the form of a written request, BTA ensures the receipt of all data previously provided by the Customer or transfers the data to another service provider.

12.7. Right to complain about the processing of personal data

The Client has the right to submit a complaint regarding the use of Personal Data to the State Data Protection Inspectorate if, in the Client's opinion, BTA violates his / her rights and interests related to the processing of Personal Data in accordance with applicable legislation.

Clients' obligations:

12.8. To provide BTA with accurate Personal Data to enable BTA to provide services to the Client properly and accurately and ensure further contact.

12.9. To update his Personal Data at least once a year or contact BTA within a reasonable period after the change of the Client's Personal Data.

12.10. Provide BTA with your accurate contact information so that BTA can contact the specific person who submitted their data to BTA. The customer can update his contact information himself by updating it on the BTA website or via the BTA mobile app.

12.11. Before starting the cooperation, to read this Privacy Policy, as well as to acquaint with it all persons who are related to the services provided by BTA and whose interests may be affected by the processes of personal data processing.

13. PROFILING, INDIVIDUAL OFFERS AND AUTOMATED DECISIONS

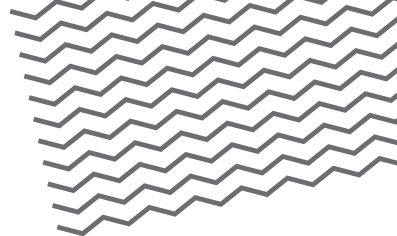
13.1. Profiling is the automatic processing of Personal Data used for automated decision-making in the calculation of insurance contributions in common types of insurance, in the calculation of insurance benefits or for direct marketing purposes.

13.2. BTA processes personal data for preparing offers tailored to the Client. If the Client has agreed to be sent commercial messages, BTA has the right to process Personal Data for the preparation of individual BTA service offers. The Client may be assigned to Client categories based on the characteristics of the services purchased, but this should not result in legal consequences or significant impact on the Client. Nevertheless, the Client may request human intervention, express his opinion and challenge such decision of BTA.

13.3. BTA ensures that Clients can select and use a tool for their privacy settings on the BTA Portal.

14. CONTACT INFORMATION

Clients may contact BTA regarding the revocation of consent, submission of requests, implementation of data subjects' rights and complaints regarding the use of Personal Data.



14.1. by email: bta@bta.lt or at the address: Laisvės pr. 10, Vilnius, LT-04215, Lithuania.

14.2. by contacting the Data Protection Officer, whose contact details are: bta@bta.lt or duomenu_apsauga@bta.lt, or sending a letter to the Data Protection Officer: Laisvės pr. 10, Vilnius, LT-04215.

15. POLICY'S VALIDITY AND AMENDMENTS

15.1. BTA is entitled to amend this Policy unilaterally in accordance with the procedure established by the effective legislation.

15.2. Client may read this Policy on the BTA website: www.bta.lt.