

"BALTIJAS APDROŠINĀŠANAS NAMS" AAS PRIVACY POLICY

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1. General Provisions

- 1.1. Personal data is any information relating to an identified or identifiable natural person (hereinafter – Personal Data).
- 1.2. We, "Baltijas Apdrošināšanas Nams" AAS, reg. No. 40003494976 (hereinafter – BAN and/or "We"), as an insurance company, process personal data daily. Acknowledging that personal data is of value to You, we invest resources and ensure in our daily operations that personal data and Your privacy are protected.
- 1.3. The purpose of this Policy is to inform You and provide an explanation of how and for what purposes personal data is processed, as well as to introduce data subject rights. However, please note that other documents (for example, insurance contracts, service agreements, cooperation agreements, website, or portal terms of use) may provide additional information regarding the processing of Your personal data.
- 1.4. This Privacy Policy applies to every data subject whose personal data is processed by BAN. Regarding matters concerning employment relationships, we provide additional information separately.

2. What Personal Data is Collected by BAN?

- 2.1. Depending on the type of legal relationship we have, as well as the specific insurance product, the types of personal data may vary. For example:
 - 2.1.1. Information about the person (first name, last name, personal identification number, residential address, email, phone number, vehicle categories the person is authorized to drive, as well as other information);
 - 2.1.2. Information about property (location, property characteristics, information about occupancy and equipment, security information, property photographs, or video recordings, as well as other information);

- 2.1.3. Information about the vehicle (registration number, vehicle make and model, information about equipment, information about previously reported claims, vehicle photographs, as well as other information);
- 2.1.4. Information about travel (information about travel destination and travellers, planned travel activities, hotel reservations, flight tickets, as well as other information);
- 2.1.5. Information about health (information about Your health and physical condition, injuries and disabilities, received medical services and examination results, as well as other information);
- 2.1.6. Information about concluded and terminated policies;
- 2.1.7. Information about submitted claims (information about the amount of loss, circumstances of the event, and other information);
- 2.1.8. Video recordings (videos recorded by our experts or videos submitted by You in the context of a submitted insurance claim case);
- 2.1.9. Financial information (bank account number, transaction data, amount of debt) or other information related to risk assessment.
- 2.1.10. Information about the use of digital services (we collect technical information about how our website, client portal and mobile application operate, for example, whether everything functions correctly, whether errors occur and how they can be resolved. If you have consented to statistical cookies, this may also include a session recording in which the text and data entered are masked. This information helps ensure the functioning of the services and improve the user experience).
- 2.2. You may at any time obtain information about the personal data processed by BAN concerning You (see Section 8.1.1 for details).

3. How Does BAN Obtain Personal Data?

- 3.1. The information we obtain about a person depends on the type of legal relationship we have, as well as the specific insurance product.
- 3.2. We may receive personal data in several ways, including:
 - 3.2.1. The data subject has provided their Personal Data to BAN, i.e., when preparing an insurance offer for the data subject, entering into an insurance or cooperation agreement, submitting a claim for insurance compensation, subscribing to newsletters, applying for a vacancy at BAN, requesting information, contacting Us, or in other cases;
 - 3.2.2. BAN may receive Your personal data from the policyholder if an insurance contract has been concluded for Your benefit. For example, if an employer has purchased employee health or accident insurance for You, or if You are designated as a beneficiary in an accident insurance contract;
 - 3.2.3. BAN may receive Your personal data from insurance intermediaries if You used the services of an insurance intermediary;
 - 3.2.4. BAN may receive Your personal data from its clients if You are a third party harmed by our client, for example, in the case of MTPL or civil liability insurance;
 - 3.2.5. Personal data may be obtained from various public registers, for example, the CSDD (Road Traffic Safety Directorate);
 - 3.2.6. When visiting BAN's website, cookies and similar technologies may be used, which we inform about during the website visit. More detailed information: <https://www.ban.lv/sikdatnu-informacija>.

4. How Does BAN Use Personal Data?

- 4.1.** BAN processes Personal Data to provide insurance services, fulfil binding legal obligations, deliver effective customer service, enable cooperation, and carry out business and administrative activities. Therefore, the acquisition of personal data is necessary for BAN to be able to provide insurance services to the client. If the client refuses to provide the necessary data, such refusal may hinder the initiation of the insurance service relationship and further contract performance.
- 4.2.** BAN processes Personal Data only on specific **legal grounds**, such as:
- 4.2.1.** Data processing is necessary to conclude or perform an insurance contract. For example, based on this legal basis, we process information about the insured object (real estate and household therein, vehicle), risk-related information, as well as other information required to conclude the insurance contract;
- 4.2.2.** You, as the data subject, have given consent for the processing of your personal data. For example, based on your consent, special categories of personal data (sensitive data) are processed, such as information about your health condition or received medical services. You have the right to withdraw your consent for further processing of your personal data by sending us a request (see Section 8.1.7 of this Policy);
- 4.2.3.** Personal data processing is necessary to protect your or another natural person's vital interests. For example, in the case of travel insurance, if an accident occurs and the person is admitted to a medical institution, we exchange information with the institution to provide immediate assistance;
- 4.2.4.** Personal data processing is necessary to fulfil a legal obligation applicable to us as a data controller. For example, we are obliged to provide your personal data upon request by the State Revenue Service or law enforcement authorities. We are also obliged to submit information to the Latvian Motor Insurers' Bureau about your concluded MTPL agreement and reported claims;
- 4.2.5.** Personal data processing is necessary for the pursuit of our or a third party's legitimate interest. For example, we process personal data on this basis to assess risk, prevent fraud, protect our property, etc. When processing personal data on this basis, we particularly assess proportionality and whether, in the specific situation, your right to privacy outweighs our or a third party's legitimate interest.
- 4.3.** BAN processes Personal Data only for specific and necessary purposes based on legal grounds deriving from REGULATION (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (hereinafter – the Regulation), and specific legal acts:

Purpose of Personal Data Processing	Legal Basis for Data Processing	Legitimate Interest
Provision of insurance services , including client identification, obtaining information about the insured object or person; providing consultations, preparing insurance offers	Regulation Article 6 (1) (b), (c), (f)	Legitimate interests of a third party to be insured; BAN's legitimate interest to assess the likelihood of insured risk and prevent fraud

Insurance risk assessment, premium calculation	Special category data Regulation Article 9 (2) (g)	
	Preparation, conclusion, amendment, early termination, and performance of the insurance contract	
Ensuring communication	MTPL Law, Insurance Contract Law and other legal acts	
Insurance contract renewal. Communication with the client to remind about policy expiry	Regulation Article 6 (f)	Ensuring continuous insurance coverage
Insurance claim administration (including claim processing, loss assessment, verification of insured event circumstances, etc.)	Regulation Article 6 (1) (b), (c), (d), (f)	Fair administration of insurance claims and fraud prevention
	Special category data Article 9 (2) (a), (c), (g)	Processing third-party personal data in claim review
Provision of services under the insurance contract	MTPL Law, Insurance Contract Law, Patients' Rights Law, and other legal acts	Risk management
Recovery of losses and debts. Filing of regress and subrogation claims, debt recovery (premium recovery, reimbursement of payments)	Regulation Article 6 (1) (b), (f)	Recovery of paid-out amounts and overdue payments for BAN services
	Special category data Article 9 (2) (f)	
	MTPL Law, Insurance Contract Law, Insurance and Reinsurance Law and other legal acts	
Use of reinsurance	Regulation Article 6 (1) (c), (f)	Reducing potential insurance losses
	Insurance and Reinsurance Law, Distribution of Insurance and Reinsurance Law	
Establishment, exercise, and defence of legal claims	Regulation Article 6 (1) (c), (f), Article 9 (2) (f)	Submitting claims to public authorities, operational institutions, or courts; responding to claims and defending BAN's position
Risk management, including credit and sanctions risk management. Fraud prevention and detection, incident management	Regulation Article 6 (1) (c), (f)	Ensuring compliance with applicable law

	Insurance and Reinsurance Law, AML/CTF Law, National and International Sanctions Law, Credit Information Law, and other legal acts	Ensuring safe and stable BAN operations
Handling of claims, complaints, and suggestions	Regulation Article 6 (1) (c), (f)	Ensuring compliance and service quality
Video surveillance at BAN to ensure employee and visitor safety and property protection	Regulation Article 6 (1) (f)	Ensuring safety of BAN visitors, employees, premises, and assets
Communication data management. Telephone call logging and recording for evidence and service quality	Regulation Article 6 (1) (b), (f)	Ensuring service quality and evidence of insurance contract execution or claim registration
Management and archiving of incoming and outgoing documents. Storage of digital data and documents	Regulation Article 6 (1) (c), (f)	Proving fulfilment of obligations and protection against claims
Provision of information about news, services, offers	Regulation Article 6 (1) (a), (f)	Client outreach
	Information Society Services Law	Insurance product development
Employee recruitment and hiring	Regulation Article 6 (1) (a), (b), Article 9 (c), (f)	Candidate evaluation
	Labour Law	Effective personnel selection
Employment relationship management	Regulation Article 6 (1) (a), (b), (c), (f), Article 9 (2) (b)	
	Labour Law, Labour Protection Law, Insurance and Reinsurance Distribution Law and other legal acts	
Accounting. Payment processing, invoice issuance	Regulation Article 6 (1) (b), (c), (f)	Payment administration
	Accounting Law	Financial management
Cooperation with insurance distributors. Contract conclusion and execution Acceptance of insurance distribution services. Ensuring communication	Regulation Article 6 (1) (b), (c), (f)	Maintaining cooperation with distributors
	Insurance and Reinsurance Distribution Law and other legal acts	
Execution and accounting of contracts with suppliers	Regulation Article 6 (1) (b), (c), (f)	Business operations management
Functionality and administration of the "BAN portal" self-service portal	Regulation Article 6 (1) (a), (b), (f), Article 9 (2) (a)	Maintenance, development, testing, and improvement of BAN services and user experience

Functionality and administration of the "BAN" mobile application		
Ensuring the functionality of the website www.ban.lv , using cookies and similar technologies, improving the user experience during visits to the website.	Regulation Article 6 (1) (a), (f) Information Society Services Law	ensure the functionality of the website, improve the user experience and develop digital services.
Ensuring the security of digital services, diagnosing errors, monitoring incidents, and resolving technical problems.	Regulation Article 6 (1) (f)	Ensure the secure, stable and uninterrupted operation of digital services, detect and resolve technical problems in a timely manner, and protect the systems and users' interests.
Conducting research, including customer satisfaction surveys Statistical data collection and analysis	Regulation Article 6 (1) (c), (f)	Improving product and service quality Company risk assessment

- 4.4. BAN may also process personal data for other specific purposes, of which the Data Subject is informed at the time they provide the relevant data to BAN.

5. To Whom May BAN Disclose Personal Data?

- 5.1. BAN ensures confidentiality and does not disclose Your personal data or information obtained during the provision of services and performance of the contract to third parties, except in cases where the exchange of personal data may be necessary for specific purposes.
- 5.2. Within BAN, access to Your personal data is granted only to employees who require it for the performance of their work duties. Disclosure does not include the transfer of personal data to our service providers who act as our data processors. All service providers acting as data processors have been carefully selected and informed about the measures, they must take to ensure the confidentiality and protection of Your personal data.
- 5.3. The recipients to whom we may disclose Your personal data depend on the insurance product or the type of specific information. For example, BAN may need to disclose Personal Data to the following categories of data recipients:
- 5.3.1. Insurance intermediaries (agent, tied agent, or broker) through whom the insurance contract has been concluded. The intermediary has access to information about the insurance policy to the extent necessary for the performance of the intermediary's duties;
- 5.3.2. Cooperation partners (e.g., auto repair shops, experts, roadside assistance services). In the context of a submitted insurance claim, they are provided information on the validity of the insurance policy and details of the submitted claim to the extent necessary for service provision under the claim;
- 5.3.3. A bank or leasing company, if specified in the insurance contract (policy) as a beneficiary. They are provided with information on the insurance policy, its validity, and the submitted insurance claims;
- 5.3.4. The Latvian Motor Insurers' Bureau (LTAB). Information is provided about concluded MTPL policies and reported traffic accidents;

- 5.3.5. Medical institutions and healthcare professionals. In the context of health or accident insurance claim review, we may exchange information with medical institutions or healthcare professionals;
- 5.3.6. Entities/companies engaged in debt collection, including debt recovery agencies, bailiffs, administrators, and other parties involved in the debt recovery process;
- 5.3.7. Credit information bureaus. Data is transmitted to assess the data subject's creditworthiness and manage our credit risk, if necessary for the conclusion and/or performance of the contract and to ensure our legitimate interests;
- 5.3.8. Reinsurance companies. In certain risk insurance cases, data exchange with reinsurers may be necessary for risk or claim assessment purposes;
- 5.3.9. The Credit Register of the Bank of Latvia. In the case of guarantee insurance, BAN is obliged to provide information on the obligations and performance thereof of the client and the client's guarantor;
- 5.3.10. Other insurance companies. Information exchange aimed at reducing insurer operational risk and preventing fraud, in cases of recourse and subrogation, and to the extent and purposes provided by law;
- 5.3.11. Outsourced service providers, to fulfil BAN's contractual and legal obligations, such as an auditor;
- 5.3.12. We are obligated to provide information to state institutions and other public persons or third parties if required by law or necessary for contract performance. For example, the Bank of Latvia, police, prosecutor's office, court, insolvency administrators, notaries, bailiffs, etc.
- 5.3.13. We may transfer your data to IT service providers that help maintain our systems, identify and resolve errors, and improve the functioning of the services.

6. How Long Does BAN Retain Data?

- 6.1. We retain personal data only for as long as necessary to achieve the purposes set out in this Privacy Policy, unless longer retention is required or permitted by applicable legal acts.
- 6.2. To determine the data retention period, we consider the performance of contractual obligations, our legitimate interests, and apply criteria consistent with those established by law, for example:
 - 6.2.1. the term for the performance of contractual obligations;
 - 6.2.2. statutory limitation periods applicable to specific types of claims;
 - 6.2.3. legally established retention periods for different types of documents, for example, under the Accounting Law or the Archives Law.

7. How Does BAN Process Personal Data?

- 7.1. When processing personal data, BAN complies with the Regulation and other applicable legal acts in the field of privacy and data processing.
- 7.2. BAN organizes data processing by applying appropriate technical, physical, legal, and organizational measures required under the laws of the Republic of Latvia and applicable European Union legal acts. We continuously develop our security processes and measures.
- 7.3. When providing services, we may also make decisions based solely on automated processing. For example, most insurance contracts concluded online are based on automated decision-making, such as MTPL contracts. When calculating the insurance premium, our system automatically analyses Your personal data, such as the driver's

experience, personal claim history, and other aspects. You cannot opt out of this type of profiling, but You may contact us and request a review of the received insurance offer.

8. What Are the Rights of the Data Subject?

8.1. Data protection laws grant You several rights regarding the processing of Your personal data:

8.1.1. Access to personal data. You have the right to request confirmation from us as to whether we are processing personal data relating to You, and, if so, to receive information about such processing and request access to Your personal data (Article 15 of the Regulation).

When exercising Your right of access, you must specify the period and the data You wish to obtain. You have the right to request information from us about what data we hold about You, why we process it, how we obtained it, to whom it has been disclosed, how long it will be stored, and to receive a copy of Your data. The request can be processed more quickly if the period is as short as possible and the request is formulated as precisely as possible. We can better respond if we know the purpose for which You wish to access the data.

8.1.2. Rectification of personal data. If You believe the information, we hold about You is incorrect or incomplete, You have the right to request that BAN supplement or correct it (Article 16 of the Regulation).

You must clearly indicate which data should be corrected and provide the accurate information. If the data was not provided by You, please include a justification for why the information should be considered inaccurate to facilitate a timely and appropriate assessment.

8.1.3. Erasure of personal data. In certain cases, You have the right to request that we delete Your personal data. However, this does not apply where legal acts require us to retain such data (Article 17 of the Regulation).

To enable us to erase Your data, You must specify which personal data should be deleted and provide justification for this request.

8.1.4. Restriction of processing. In certain cases, You have the right to restrict the processing of Your personal data (Article 18 of the Regulation).

If You are unsure whether we are processing the data lawfully, You may ask us to restrict the processing of specific data. Your request must state why, in Your opinion, such processing should be restricted.

8.1.5. Data portability. You have the right to receive or transmit Your personal data to another controller ("data portability"). This applies only to data You have provided to us based on consent or a contract, and when the processing is carried out by automated means (Article 20 of the Regulation).

8.1.6. Objection to processing. You have the right to object to the processing of Your Personal Data if it is based on legitimate interests, including profiling for direct marketing purposes, such as receiving marketing offers or participating in surveys (Article 21 of the Regulation).

For example, BAN sends reminders about the upcoming expiration of insurance contracts and offers to extend the contract, based on legitimate interests — ensuring continuous insurance coverage.

You have the right to object to receiving such reminders. If You object, You will not receive any reminders about the approaching expiry of Your insurance contract. To unsubscribe, write to: office@ban.lv or call +371 67080408.

8.1.7. Right to withdraw consent.

The data subject has the right to withdraw their consent for data processing at any time in the same manner it was given — by calling +371 67080408, writing to office@ban.lv, or visiting a BAN service centre. In that case, further data processing based on the withdrawn consent will no longer take place.

Please note that withdrawal of consent may prevent us from fulfilling the purpose for which the consent was originally given. In some cases, we may not be able to continue providing insurance services or process claims.

The withdrawal of consent does not affect processing carried out while the consent was in effect.

Withdrawing consent does not stop data processing based on other legal grounds.

8.1.8. Right not to be subject to fully automated decision-making, including profiling, if such decision-making has legal or similarly significant effects on You. This right does not apply if the decision is necessary for entering into or performing a contract with the data subject, is permitted under applicable legal acts, or if the data subject has given explicit consent (Article 22 of the Regulation).

8.2. The data subject may submit a reasoned request to exercise their rights:

- 8.2.1. in written form in person at BAN Client Service Centres by presenting an identity document;
- 8.2.2. by email, signed with a secure electronic signature and sent to: personasdati@ban.lv;
- 8.2.3. by sending a handwritten, signed request that includes identifying information.

8.3. Upon receiving the data subject's request to exercise their rights, BAN verifies the data subject's identity, evaluates the request, and fulfils it in accordance with applicable laws. A response to the data subject's request is provided no later than one month from the date of receipt; if necessary, this period may be extended by an additional two months.

8.4. BAN sends the response to the data subject by registered mail to the contact address provided, or by email as an electronically signed document if requested by the data subject, considering the data subject's preferred method of response as far as possible.

8.5. We reserve the right not to fulfil Your request if:

- 8.5.1. it is not formulated clearly;
- 8.5.2. we are unable to identify You;
- 8.5.3. we have already provided a response to such a request;
- 8.5.4. the volume of requested information is disproportionate;
- 8.5.5. the request is unfounded (e.g., unrelated to our company, no justification provided as to why the request should be fulfilled);
- 8.5.6. the applicable legal acts prohibit us from providing such information or require us to retain specific data.

8.6. BAN ensures compliance with data processing and protection requirements in accordance with legal acts and, in the case of a data subject's objection, undertakes reasonable steps to resolve the objection. However, if this is not successful, the data

subject has the right to lodge a complaint with the supervisory authority – the Data State Inspectorate:
Elijas street 17, Riga, LV-1050
pasts@dvi.gov.lv
<https://www.dvi.gov.lv/lv>
+371 67223131

9. Access to Personal Data by Third-Country Entities

We always strive to process Your personal data within the territory of the European Union and the European Economic Area. However, considering the global nature of insurance services, to achieve the purposes outlined above, we may occasionally need to transfer Your data to entities located in other countries. For example, when fulfilling a travel insurance contract. In such cases, BAN ensures that the procedures established by legal acts are followed to guarantee a level of personal data processing and protection equivalent to that provided under the Regulation.

To provide digital services, we may use IT service providers whose activities (for example, data processing or technical support) may take place outside the European Union and the European Economic Area. In such cases, where possible, we ensure that data is stored in the European Union and apply appropriate security measures.

10. How Can You Stay Informed About Changes to This Privacy Policy?

As we continuously improve and develop our operations, it is possible that we will periodically amend and supplement this Privacy Policy. Therefore, we encourage You to regularly review the current version of the Privacy Policy. It is available at BAN Client Service Centres and on the BAN website: www.ban.lv.

11. How to Contact BAN?

If You have any questions or uncertainties regarding this Privacy Policy or the processing of Personal Data, we invite You to contact BAN using the contact information below or by contacting BAN's Data Protection Officer.

"Baltijas Apdrošināšanas Nams" AAS

Antonijas iela 23, Rīga, LV-1010

t. 67080408

email: office@ban.lv

Data Protection Officer: personasdati@ban.lv

You may also contact our Data Protection Officer by sending a letter to the address above, addressed to the Data Protection Officer.