
Business Specific Privacy Notice

Crystal Reinsurance s.r.o. conducts professional services providing a service within reinsurance field and managing agent. Crystal Reinsurance s.r.o. is committed to protecting your privacy and personal information. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners, and others who share their personal information with us.

What does this Privacy Notice do?

This privacy notice ("Notice") explains the data processing practices of Crystal Reinsurance s.r.o. ("Crystal") as well as Aon plc. ("Aon") including its affiliates and subsidiaries (also referred to as the pronoun forms "we" and "our" or "the Company").

It applies to any personal information you provide to us in connection with the provision of the services and as well as personal information we collect from other sources. This Notice is a statement of our practices and of your rights regarding your personal information. This is not a contractual document, and it does not create any rights or obligations on either party, beyond those which already exist under data protection laws.

Who is responsible for your information?

Crystal is responsible for your personal information (and the controller for the purposes of data protection laws) that we collect from or about you.

When and how do we collect your information?

We collect personal information in the following ways:

- When we perform services for our clients and for employees of our clients.
- When you request a service from us.
- If you contact us with a complaint or query.
- we may also collect information about you indirectly from insurers, agents or entities within the Aon group. This information may be collected before and during the provision of services.

What information do we collect?

Information you provide to us

When you provide personal information to us, we use it for the purposes for which it was provided to us as stated at the point of collection or as obvious from the context of collection, for example providing an insurance quote or delivering a consulting project.



When we provide the services listed above for our clients, we may collect personal information such as:

- Contact information, such as name, e-mail address, postal address, phone number, personal ID number
- Communication preferences, such as which newsletters you would like to receive
- Other relevant information, such as occupation, communication language, zip code, area code, location, and the time zone
- Health information, bank account number and other sensitive personal information (for delivering life of health insurance coverage or claims handling).

More information about the personal information collected for each of our services, together with the purpose and legal basis for collecting the information is provided below.

You are required to provide all of your personal data that we reasonably request (in a form that is acceptable to us) in order to comply with our obligations in connection with the services we provide to you, including legal and regulatory obligations. If you fail to provide us with personal data or delay in providing it to us to comply with these obligations, we may not be able to offer you services and/or we may terminate the services provided to you with immediate effect.

If you provide Crystal with personal information about third parties (e.g., information about your spouse, partner, children, dependents or emergency contacts), you should provide a copy of this notice to those individuals in advance, if applicable, or ensure that they are otherwise informed about how their information will be used by Crystal.

We will not collect any sensitive personal information unless this is required. Sensitive personal information includes a number of types of data relating to: physical or mental health

If you provide us with sensitive personal information, you understand and give your explicit consent that we may collect, use and disclose this information to appropriate third parties for the purposes described in this Notice. If you provide personal information about other individuals such as employees or dependents, you must obtain their consent prior to your disclosure to us.

Accuracy of your information

We rely on the availability of accurate personal information to provide you with services and to run our business. You should inform us of any changes to your personal information, in particular changes to your contact details, bank account details, insurance policy details or other details that may affect the proper management and administration of your insurance policy and/or the services we provide to you.

How do we use your personal information?

The following is a summary of the purposes for which we use personal information. More information about the personal information collected for each of our services, together with the purpose and legal basis for collecting the information will be provided to you below.

Performing services for our clients

We process personal information which our clients provide to us in order to perform our professional consultancy and risk based advisory services. This may impact you, for example, where you are the employee of our client, or the member of a client's pension scheme. The precise purposes for which your personal information is processed will be determined by the scope and specification of our client engagement, and by applicable laws, regulatory guidance and professional standards. It is the obligation of our client to ensure that you understand that your personal information will be disclosed to Crystal (or to service providers such as Crystal).

We will use the personal information we collect about you in connection with the provision of our services, including for the purpose of transferring the books of business to Crystal's successors in the event of a sale or reorganization.

Administering our client engagements

We process personal information about our clients and the individual representatives of our corporate clients in order to:

- Carry out "Know Your Client" checks and screening prior to starting a new engagement;
- Carry out client communication, service, billing and administration;
- Deal with client complaints;
- Administer claims.

Contacting and marketing our clients and prospective clients

We process personal information about our clients and the individual representatives of our corporate clients in order to:

- Contact our clients in relation to current, future and proposed engagements;
- Send our clients newsletters, know-how, promotional material and other marketing communications;
- Invite our clients to events (and arrange and administer those events).

Conducting data analytics

We are an innovative business, which relies on developing sophisticated products and services by drawing on our experience from prior engagements. We are not concerned with an analysis of identifiable individuals, and we take steps to ensure that your rights and the legitimacy of our activities are ensured through the use of aggregated or otherwise de-identified data.

If we wish to use your personal information for a purpose which is not compatible with the purpose for which it was collected for, we will request your consent. In all cases, we balance our legal use of your personal information with your interests, rights, and freedoms in accordance with applicable laws and regulations to make sure that your personal information is not subject to unnecessary risk.

Legal basis

All processing (i.e., use) of your personal information is justified by a "lawful basis" for processing. In the majority of cases, processing will be justified on the basis that:

- The processing is necessary for the **performance of a contract** to which you are a party, or to take steps (at your request) to enter into a contract (e.g., where we help an employer to fulfil an obligation to you under an employment contract in relation to the delivery of employee benefits);
- The processing is necessary for us to comply with a relevant **legal obligation** (e.g., where we are required to collect certain information about our clients for tax or accounting purposes, or where we are required to make disclosures to courts or regulators); or
- The processing is in our **legitimate commercial interests**, subject to your interests and fundamental rights (e.g., where we use personal information provided to us by our clients to deliver our services, and that processing is not necessary in relation to a contract to which you are a party).

In limited circumstances, we will use your **consent** as the basis for processing your personal information, for example, where we are required to obtain your prior consent in order to send you marketing communications. You have the full right to refuse granting of such consent. You also have the right to withdraw consent, or to grant consent only to a certain extent of processing. You can narrow or expand this range at any time. For such a change / withdrawal of the consent please use informace@aon.cz.

Before collecting and/or using any sensitive data, we will establish a lawful basis which will allow us to use such data. This basis will typically be:

- Your explicit consent;
- The establishment, exercise or defense by us or third parties of legal claims; or
- A context specific exemption provided for under local laws of EU Member States and other countries implementing the GDPR, such as in relation to the processing of personal data for insurance purposes, or for determining benefits under an occupational pension scheme.

Do we collect information from children?

We do not directly provide services to children, and we do not knowingly collect personal information from children.

How long do we retain your personal information?

We retain appropriate records of your personal information to operate our business and comply with our legal and regulatory obligations. These records are retained for predefined retention periods that may extend beyond the period for which we provide the services to you. In most cases we shall retain your personal information for no longer than is required under the applicable laws. We have

implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

How and to whom we disclose your personal information?

We generally share your personal information with the following categories of recipients where necessary to offer, administer and manage the services provided to you:

a) Within Aon

We may share your personal information with other Aon entities, brands, divisions, and subsidiaries to serve you, including for the activities listed above.

We do not rent, sell or otherwise disclose personal information with unaffiliated third parties for their own marketing use. We do not share your personal information with third parties except in the following circumstances discussed below.

b) Crystal 's successors

We may provide your personal information to Crystal's successors of the business, where Crystal or the services are sold to, acquired by or merged with another organisation, in whole or in part. Where personal information is shared in these circumstances it will continue to be used in accordance with this Notice.

Business Partners

We disclose personal information to business partners who provide certain specialized services to us, or who co-operate with us on projects. These business partners operate as separate controllers and are responsible for their own compliance with data protection laws. You should refer to their privacy notices for more information about their practices.

- Insurance broking and insurance products - insurers, reinsurers, other insurance intermediaries, insurance reference bureaus, medical service providers, fraud detection agencies, our advisers such as loss adjusters, lawyers and accountants and others involved in the claims handling process (e.g., independent claims adjusters or risk engineers).

Authorized Service Providers

We may disclose your information to service providers we have retained (as processors) to perform services on our behalf (either in relation to services performed for our clients, or information which we use for its own purposes, such as marketing). These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. These activities could include any of the processing activities that we carry out as described in the above section, 'How we use your personal information.'

- IT service providers who manage our IT and back-office systems and telecommunications networks

Microsoft corp. (USA)

These third parties appropriately safeguard your data, and their activities are limited to the purposes for which your data was provided.

Legal Requirements and Business Transfers

We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request. (ii) in response to law enforcement authority or other government official requests, (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iv) in connection with an investigation of suspected or actual illegal activity or (v) in the event that we are subject to a merger or acquisition to the new owner of the business. Disclosure may also be required for Company and/or Crystal audits or to investigate a complaint or security threat.

Do we transfer your personal information across geographies?

We operate globally and worldwide and therefore reserve the right to transfer your personal data to our approved service providers or business partners in other countries working on our behalf in accordance with applicable law to other countries, including but not limited to the United Kingdom, Ireland and India, where it will be processed for the purposes set out in this Notice. In particular, we may make such transfers to offer, administer and manage the services provided to you and improve the efficiency of our business operations. We shall endeavour to ensure that such transfers comply with all applicable data privacy laws and regulations and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.

This may include transfers to countries that the European Commission (the “EC”) and the CZE data protection regulator consider to provide adequate data privacy safeguards and to some countries that are not subject to an adequacy decision. Where we transfer personal information to countries that are not subject to an adequacy decision, we use a variety of legal mechanisms and safeguards to help ensure your rights are protected sufficiently:

- We ensure transfers within are covered by agreements based on the EU Commission's standard contractual clauses, which contractually oblige each member to ensure that personal information receives an adequate and consistent level of protection wherever it resides within;
- Where we transfer your personal information outside of us or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information. Some of these assurances are well recognized certification schemes, or the standard contractual clauses; or
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed.

If you would like further information about whether your information will be disclosed to overseas recipients, please contact us as noted below. You also have a right to contact us for more information about the safeguards we have put in place (including a copy of relevant contractual commitments, which may be redacted for reasons of commercial confidentiality) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

Do we have security measures in place to protect your information?

The security of your personal information is important to us and we have implemented appropriate security measures to protect the confidentiality, integrity and availability of the personal information we collect about you and ensure that such information is processed in accordance with applicable data privacy laws.

We have implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. We protect your personal information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your personal information, and they receive training about the importance of protecting personal information.

Our service providers and agents are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purpose.

What choices do you have about your personal information in relation to direct marketing?

We offer certain choices about how we communicate with our customers and what personal information we obtain about them and share with others. When you provide us with personal details, if we intend to use those details for marketing purposes, we will provide you with the option of whether you wish to receive promotional email, SMS messages, telephone calls and postal mail from us. At any time, you may opt out from receiving interest-based advertising from us by visiting our opt-out page.

We will use your personal information to send you direct marketing about other products and services that we feel may be of interest to you. Your personal information will only be used for direct marketing in accordance with applicable laws and regulations. If you receive direct marketing communications from us (promotional emails, SMS messages, telephone calls and mailings), we will always provide you with the opportunity to opt-out of such direct marketing (usually by means of an "unsubscribe link"). You can also change your marketing preferences at any stage by contacting us via Aon Global Preference Centre. Please note that, even if you opt out of receiving direct marketing communications, we may still send you service-related communications where necessary.

How can you update your communication preferences?

We take reasonable steps to provide you with communication about your information. You can update your communication preferences in the following ways.

Newsletters

If you request electronic communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in the communication.

Email

Contact us by e-mail or postal address as noted below. Please include your current contact information, the information you are interested in accessing and your requested changes.

If we do not provide you with access, we will provide you with the reason for refusal and inform you of any exceptions relied upon.

Other rights regarding your data

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information. If necessary, you can obtain further information regarding these rights and their exercise by contacting us.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way. If we are unable to comply with your request to exercise any of your rights under applicable personal data protection laws, we will explain to you in writing the reason for the refusal.

Right to Access

You have right to access and inspect your personal information which we hold about you or to be provided with a permanent copy of the data we hold about you. If you have created a profile, you can access that information by visiting your account. Upon request, you will be provided by a copy of the information being held about you.

Right to Correction

You have a right to request us to correct your personal information where it is inaccurate or out of date. as well as the right to complete the information and notify us that you dispute its accuracy.

Right to object in relation to direct marketing

You have the right to object to the use of your personal information for direct marketing purposes.

Right to object to automated decision-making

You have the right to object to decisions on the use of your personal data that have been taken solely by automated means.

Right to withdraw consent

You have the right to withdraw your consent at any time if the processing of your personal data is based on your consent, at the same time without prejudice to the lawfulness of the processing prior to its withdrawal.

Right to be Forgotten (Right to Erasure)

You have the right under certain circumstances to have your personal information erased. Your information can only be erased if your data is no longer necessary for the purpose for which it was collected, and we have no other legal ground for processing the data.

Right to Restrict Processing

You have the right to restrict the processing of your personal information, but only where:

- Its accuracy is contested, to enable us to verify its accuracy; or
- The processing is unlawful, but you do not want it erased; or
- It is no longer needed for the purposes for which it was collected, but you require it to establish, exercise or defend legal claims; or
- You have exercised the right to object, and verification of overriding grounds is pending.

Right to Data Portability

You have the right to data portability, which requires us to provide personal information to you or another controller in a commonly used, machine readable format, but only where the processing of that information is based on (i) consent; or (ii) the performance of a contract to which you are a party.

Right to Object to Processing

You have the right to object the processing of your personal information at any time, but only where that processing is has our legitimate interests as its legal basis. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

International Transfers

As noted above, you can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

Right to complain

You have the right to lodge a complaint about our processing of your personal information with the competent authority for the protection of personal information, which is the Office for Personal Data Protection (“Úřad pro ochranu osobních údajů, Pplk. Sochora 27, 170 00 Prague 7, tel. +420 234 665 111, email: posta@uoou.cz).

Automated Decisions

Where you apply or register to receive the service, we may carry out a real-time automated assessment to determine whether you are eligible to receive the service. An automated assessment is an assessment carried out automatically using technological means (e.g., computer systems) without human involvement. This assessment will analyse your personal information and comprise a number of checks, e.g., credit history and bankruptcy check, validation of your driving licence and

motoring convictions, validation of your previous claim's history and other fraud prevention checks. Where your application to receive, the service does not appear to meet the eligible criteria, it may be automatically refused, and you will receive notification of this during the application process. However, where a decision is taken solely by automated means involving the use of your personal information, you have the right to challenge the decision and ask us to reconsider the matter, with human intervention. If you wish to exercise this right, you should contact us.

Contact Us

If you have any questions, would like further information about our privacy and information handling practices, would like to discuss opt-outs or withdrawing consent, or would like to make a complaint about a breach of the law or this Privacy Notice, please contact us via the Global Data Privacy Office at the following address:

Global Data Privacy Office
Crystal Reinsurance s.r.o.
Václavské náměstí 19, 110 00, Prague Czech Republic
e-mail: privacy.cee@aon.com

If you have any questions relating to this Notice, please contact us in our office: Crystal Reinsurance s.r.o. a.s, Václavské náměstí 19, 110 00 Praha 1, informace@aon.cz.

Changes to this Notice

This Notice is not contractual, and Aon reserves the right to update this Notice from time to time to ensure that it continues to accurately reflect the manner in which it collects and uses your personal information. If we do so, we will post the current version on this website and revise the version date located at the bottom of this page.

We encourage you to periodically review this Notice so that you will be aware of our privacy practices.

This Notice was last updated on 24.10.2023