

# GDPR MAK Ubezpieczenia

## What is GDPR?

**GDPR**, that is 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), is a new law regulating the principles of personal data protection. The GDPR has been applicable throughout the European Union since 25 May 2018. The main objective of the GDPR is to ensure a high and consistent level of privacy protection for individuals throughout the European Union.

## Who is the controller of your personal data?

The controller of your personal data processed under a granted power of attorney, a concluded contract or an expressed consent is M.A.K. Ubezpieczenia Sp. z o.o.

## When and on what legal basis do we process your personal data?

Within its business activities, M.A.K. Ubezpieczenia Sp. z o.o. processes personal data, in particular, for the following purposes and under the following legal bases:

- **performance of the commissioned insurance brokerage service** – Article 6(1)(b) of the GDPR (performance of the contract), Article 6(1)(c) of the GDPR (legal obligation – the Civil Code, Insurance Distribution Act) and Article 6(1)(f) of the GDPR (legitimate interest, namely contacting you when concluding and providing the service),
- **consideration of complaints** – Article 6(1)(b) of the GDPR (performance of the contract) and Article 6(1)(c) of the GDPR (legal obligation – Act on the Consideration of Complaints by Financial Market Entities, Insurance Distribution Act),
- **marketing** – Article 6(1)(f) of the GDPR (legitimate interest, namely direct marketing),
- **pursuing and defending against possible claims** – Article 6(1)(f) of the GDPR (legitimate interest, namely pursuing and defending against possible claims).

## From what sources do we obtain your personal data?

We collect personal data directly from data subjects, including through contact (by telephone, email, or in person), powers of attorney, contracts and other forms or declarations.

## With whom do we share your personal data?

We may transfer your personal data to other entities as permitted by law, particularly to fulfil powers of attorney, perform contracts, and comply with our legal obligations.

We may disclose personal data to the following categories of recipients, including but not limited to:

- Entities providing services to support our business operations, including IT system delivery and maintenance, legal services, debt collection, and document archiving and destruction.
- Legally authorised recipients of personal data.

### **What measures do we take to protect your personal data?**

The GDPR aims to ensure that organisations and their employees process personal data securely and responsibly. M.A.K. Ubezpieczenia Sp. z o.o. is committed to ensuring the highest level of security for processed personal data.

In order to protect your personal data, M.A.K. Ubezpieczenia Sp. z o.o.:

- has appointed a Data Protection Officer responsible for ensuring an appropriate level of privacy protection,
- provides data protection training to all employees who may process personal data, promoting a culture of data protection awareness within the organisation,
- has obliged its employees to maintain the confidentiality of your personal data,
- has implemented special internal procedures (including, among other things, the Security Policy, procedures for exercising the rights of data subjects, data retention rules, etc.) which aim to ensure the lawful personal data processing,
- is undergoes periodic internal audits to identify any irregularities or threats to your privacy,
- maintains a high level of security for its IT infrastructure.

### **What are your rights regarding the processing of your personal data?**

The GDPR regulations grant a wide range of rights to protect your privacy. Remember that not all laws apply in every situation. We will make every effort to facilitate the exercise of your rights.

#### **Right to withdraw consent:**

- Where processing is based on your consent, you have the right to withdraw that consent at any time.
- Withdrawal of consent means that M.A.K. Ubezpieczenia Sp. z o.o. will no longer process your personal data on that basis.
- Withdrawal of your consent does not affect the lawfulness of the processing performed based on your consent before its withdrawal.

#### **Right of access to personal data**

- The right to access your data gives you the right to:

- a) confirm whether M.A.K. Ubezpieczenia Sp. z o.o. is processing your personal data and, if so, to obtain further information about the processing (including the purposes, categories of data and categories of recipients).
  - b) obtain a copy of the personal data that is being processed.
- The exercise of your right of access will result in the provision of information relating to the processing of your personal data.
  - Upon exercising your right of access, you may specify a preferred format for receiving your personal data. In the absence of such a specification, the information will be provided using the same communication method you used for your request.

### **Right to rectification of personal data**

- You are entitled to:
  - a) Rectification of inaccurate personal data,
  - b) Completion of incomplete personal data,
- Your request should demonstrate that the rectification or completion is necessary, for example, because M.A.K. Ubezpieczenia Sp. z o.o. processes your personal data inaccurately or incompletely.

### **Right to erasure**

- The right to erasure encompasses two distinct rights:
  - a) possibility of requesting the erasure of personal data,
  - b) possibility of requesting that M.A.K. Ubezpieczenia Sp. z o.o. informs other controllers of personal data, to whom it has disclosed your personal data, that you require them to delete all links to this data as well as the copies and replications thereof (the so-called right to be forgotten),
- possibility of requesting the erasure of data by other controllers of personal data implies the right to request the erasure of personal data by M.A.K. Ubezpieczenia Sp. z o.o.,
- You may request the erasure of your personal data in the cases indicated in Article 17 (1) of the GDPR, that is, among others, if your personal data are no longer necessary for the purposes for which they were collected, if you have withdrawn your consent to the processing, if you have objected to the processing or if your personal data have been processed unlawfully.

### **Right to restriction of processing**

- Restriction of processing means that personal data will only be stored.
- M.A.K. Ubezpieczenia Sp. z o.o. will restrict the processing of your personal data under the conditions outlined in Article 18 of the GDPR, including if: you contest the accuracy

of your personal data, you object to the erasure of the unlawfully processed personal data, you request the restriction of processing the personal data which should have been erased but are necessary for you to establish, pursue or defend against claims or you object to the processing of personal data.

### **Right to data portability**

- The right to data portability encompasses two distinct rights:
  - a) the right to receive the personal data you provided to M.A.K. Ubezpieczenia Sp. z o.o. in a structured, commonly used and machine-readable format,
  - b) the right to transmit the personal data you provided to M.A.K. Ubezpieczenia Sp. z o.o. without hindrance,
- You can exercise your right to data portability if two conditions are met:
  - a) The processing of your personal data is based on your consent or is necessary for the performance of a contract, and
  - b) Your personal data is processed by automated means.

### **Right to object**

- You have the right to object to the processing of your personal data:
  - a) based on public interest or legitimate interests, where the objection is related to your particular situation. This includes objecting to profiling based on these same grounds.
  - b) for direct marketing purposes,
  - c) for statistical purposes.

### **For how long do we process your personal data?**

We retain your personal data in an identifiable format only for as long as necessary for the specified processing purpose. Once the processing purpose is fulfilled, your personal data will be deleted or anonymised.

M.A.K. Ubezpieczenia Sp. z o.o. will delete or anonymise your personal data, specifically when:

- the data subject withdraws consent to the processing of personal data and there is no other legal ground for the processing,
- the data subject objects to further processing,
- the applicable limitation periods have expired,
- our legal obligation to retain your personal data expires.

**How can you contact us regarding the processing of your personal data?**

If you have any questions about the processing of your personal data, the Data Protection Officer will provide you with information.

**By letter:**

„M.A.K. Ubezpieczenia” Sp. z o.o.

ul. Domaniewska 39,

02-672 Warszawa

Please add the following note: "IOD"

**By email:**

[iod@mak-investments.pl](mailto:iod@mak-investments.pl)

**By telephone:**

+48 (22) 852-30-61