



REGULATIONS ON THE RIGHTS OF THE DATA SUBJECT

These regulations set out the terms and conditions under which natural persons whose persona data are processed by **DioDea Risk Management Services LLC**, (hereinafter "**DioDea M.E.P.E.**") may exercise their rights under the legislation for the protection of personal data.

PART 1: PRINCIPLES

1.1 DioDea M.E.P.E. shall process and protect all the personal data lawfully, fairly and in accordance with the specified, explicit and legitimate purposes.

1.2 The following principles are kept by the personnel when processing data when they execute insurance obligations, make insurance contract and settlement of claims of insurance contacts as part of their employment obligations.

- 1) Personal data shall be processed lawfully and fairly.
- 2) Personal data shall be collected for specified, explicit and legitimate purposes and are not further processed in a manner that is incompatible with those purposes.
- 3) Data collected and processed by Claims Handling Department is relevant, interconnected and limited to what is necessary in relation to the purposes for which they are processed;
- 4) Personal data shall be accurate and if necessary kept up to date.
- 5) Personal data shall be erased or rectified when there is prerequisite that it might be inaccurate, having regard to the purposes for which they are processed.
- 6) Personal data shall be kept in format which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

1.3 Personal data processing personnel are going through an initial and regular training for confidentiality and are acquainted with the legislation.

PART 2: DEFINITIONS

The mentioned definitions have the following meaning:

“Personal data” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as 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.

“Applicable legislation” means all the personal data protection legislation of the European Union and of the Hellenic Republic.

“Profiling” means any form of automatic processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning the natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movement.

“Data subject” means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as 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 the natural person.

Regulation (EU) 2016/679, means Regulations of the European Parliament and The Council on 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) stated in The Official Newspaper of European union of 4th May 2016.

PART 3: RIGHTS OF THE DATA SUBJECT

Data subjects have the following rights

- Right of access
- Right to rectification
- Right to data portability
- Right of erasure (“right to be forgotten”)
- Right to restriction of processing
- Right of objection against data processing
- Right of data subject not to be subject to a decision, based solely on automatic processing, including profiling

RIGHT OF ACCESS

3.1 Upon request DioDea M.E.P.E. provides the data subject with the following personal data:

- confirmation as to whether or not DioDea M.E.P.E. processes personal data concerning him or her;
- copy of the personal data undergoing processing;
- information regarding data processing.

3.2 DioDea M.E.P.E. provides the following information regarding the personal data (article 2.1):

- the purposes of the process organization;
- the categories of personal data concerned;
- the recipients or categories recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine the period;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing ;
- the right to lodge a complaint to supervision authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;
- whenever the personal data are transferred to a third country or to an international organization ,the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

3.3 The information regarding the processed personal data is provided by DioDea M.E.P.E. only through a privacy notification.

3.4 Upon request of the data subject, a copy of the personal data undergoing processing.

3.5 DioDea M.E.P.E. is not allowed to provide a copy of the following personal data:

- personal data of third party without their consent;
- data that is trade secret, intellectual property or confidential information;
- another information that is protected in accordance with the applicable legislation

3.6 Providing access to individuals with personal data can not adversely affect the fundamental rights and freedoms of third party is in violation with the DioDea M.E.P.E. norm.

3.7 When the access requirements are unfounded or excessive, for example for any further copies, DioDea M.E.P.E. may charge reasonable fee based on administrative cost of data delivery or to refuse to respond to the request for access.

3.8 DioDea M.E.P.E. assesses on a case-by-case basis whether a request is manifestly unfounded or excessive.

3.9 If DioDea M.E.P.E. does not provide access to personal data, the company argues his refusal and informs the individual for his/ her right to file a complaint with Commission for personal data protection.

RIGHT TO RECTIFICATION

3.10 Data subjects shall have the right to obtain from DioDea M.E.P.E. the rectification of inaccurate personal data concerning him or her.

3.11 In case of rectification personal data DioDea M.E.P.E. notifies the other recipients to whom the data was disclosed (such as government bodies, service providers) so that they can changes reflect the changes.

RIGHT TO ERASURE (“RIGHT TO BE FORGOTTEN”)

3.12 Upon request DioDea M.E.P.E. is obliged to delete any personal data, if any of following:

- if personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- The data subject withdraws consent on which processing is based and where there is no other legal ground for the processing;
- data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- data subject objects to the processing for the purpose of direct marketing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligations of DioDea M.E.P.E.
- the personal data have been collected in relation to the offer of information society services to children referred to in article 8, par.1 of European regulation (EU) 2016/679

3.13 DioDea M.E.P.E. is not obliged to erase personal data if the processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation of DioDea M.E.P.E.;
- for reasons of public interest in the area public health in accordance with points (h) and (i) of Article 9 (2) as well as article 9 (3) of European regulations 2016/679;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with article 89, par.1 of European regulations 2016/679 in so far as the right of erasure is likely to render impossible or seriously impair the achievement of the objectives of the processing;
- for the establishment, exercise or defense of legal claims.

RIGHT TO RESTRICT DATA PROCESSING

3.14 The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- the accuracy of personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;
- the data subject has objected to processing on the basis of DioDea M.E.P.E.'s legitimate interest pending the verification whether the legitimate grounds of the controller override those of the data subject.

3.15 Where processing has been restricted personal data shall be processed with the exception of:

- for the purpose of data storage;
- with the data subject's consent;
- for the establishment, exercise or defense of legal claims;
- for the purpose of protection of the rights of another natural or legal person;
- for the reason of important public interest of the Union or of a Member State.

3.16 A data subject who has obtained restriction of processing pursuant to paragraph 6.1. shall be informed by DioDea M.E.P.E. before the restriction of processing is lifted.

RIGHT OF DATA PORTABILITY

3.17 The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to DioDea M.E.P.E., in a structured, commonly used and machine-readable format.

3.18 Upon request the data subject has the right to transmit those data without hindrance from the controller to which the personal data have been provided;

3.19 The data subject shall have the right to data portability in the following cases:

- the processing is based on consent of the data subject;
- the processing is based on a contract;
- the processing is carried out by automated means.

3.20 The right of data portability shall not adversely affect the rights and freedoms of others.

RIGHT TO OBJECT

3.21 The data subject shall have the right to object to processing of personal data concerning him or her by DioDea M.E.P.E. which is based on:

- data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- processing is necessary for the purposes of the legitimate interest pursued by DioDea M.E.P.E. or by a third party;
- data processing includes profiling.

3.22 The controller shall no longer process the personal data unless the controller compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

RIGHT TO PROTEST TO PROCESSING OF PERSONAL DATA FOR DIRECT MARKETING PURPOSES

3.23 Where personal data are processed for direct marketing, the data subject shall have the right to object at any time to processing data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3.24 Where data subject objects to processing for the direct marketing purposes, the personal data shall no longer be processed for such purposes.

AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING

3.25 The data subject have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

3.26 DioDea M.E.P.E. provides every data subject essential information about the logic involved in any automatic personal data processing, as well as the meaning and the consequences of such processing.

PART 4: PROCEDURE FOR EXERCISING OF THE RIGHTS OF DATA SUBJECTS

4.1 Data subjects can exercise data protection rights in accordance with certain rules after making a request for exercising of the right.

4.2 Requests can be made in some of the following ways:

- Via e-mail : gdpr.gr@diodea.eu
- At the office of DioDea M.E.P.E. - 38 Emmanuel Benaki Str., 10678, ATHENS, Greece

4.3 The Request must contain the following information:

- Identification of the natural person - name and personal identity number/ policy number / client number
- contacts of the person – address, telephone number, e-mail etc.
- description of the request

4.4 DioDea M.E.P.E. shall provide information on action taken on requests to the data subject without undue delay and in any event within one month of receipt of the request.

4.5 The period may be extended by two further months where necessary, taking into account the complexity and number of the requests. DioDea M.E.P.E. shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

4.6 DioDea M.E.P.E. shall not refuse to act on the request of the data subject for exercising his or her rights unless the controller demonstrates that it is not in a position to identify the data subject.

4.7 Where DioDea M.E.P.E. has reasonable doubts concerning the identity of the natural person making the request the controller may request the provision of additional information necessary to confirm the identity of the data subjects.

4.8 Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.