

# privacy notice

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**PANCYPRIAN INSURANCE**

MEMBER OF THE HELLENIC BANK GROUP

# privacy notice

This privacy notice provides an overview of how Pancyprrian Insurance Ltd (the "Company") processes your personal data. "Personal data" refers to any information relating to you that the Company obtains from you or other parties. The kinds of data processed and how they are used depends, largely, on the services you request from the Company, or the Company agrees to provide to you, from time to time.

In all cases, the processing of your personal data by the Company must be in compliance with the provisions of applicable personal data protection law (including the EU General Data Protection Regulation or "GDPR", applicable as of 25 May 2018). The rights provided to you by the GDPR in relation to the processing of your personal data by the Company are described in this notice.

## who is responsible for processing your personal data and who you can contact in this regard

Your personal data will be held by the Company and responsibility for their processing lies with:

**Pancyprrian Insurance Ltd**  
66, Griva Digeni Ave.,  
Pancyprrian Bldg,  
1095 Nicosia, Cyprus  
Tel: (+357) 22743743  
E-mail: [pancyprrian@hellenicbank.com](mailto:pancyprrian@hellenicbank.com)

You can reach the Company's **Data Protection Officer** at:

**Data Protection Officer**  
**Pancyprrian Insurance Ltd**  
173, Athalassas Avenue,  
2025 Strovolos  
P.O. Box 24747  
1394 Nicosia, Cyprus  
E-mail: [dataprotection@hellenicbank.com](mailto:dataprotection@hellenicbank.com)

## how the company uses your personal data

This privacy notice is to let you know how the Company processes your personal information. This includes information you give to the Company about yourself, information that the Company learns through its relationship with you and information about you that the Company collects from other sources as explained below in *Where the Company collects your personal data from*.

*The Company's relationship with you will arise in any of the following ways:*

- you are the Company's customer
- you have applied to the Company for a service or product offered by the Company
- you represent a customer of the Company
- you are an officer, signatory, representative or beneficial owner of a company which is the Company's customer
- you are a guarantor or have provided any type of security to the Company in relation to the obligations of an agent of the Company
- you have parental responsibility over a customer/claimant of the Company who is a minor

## reasons for processing your data

The law allows the Company to use personal data, including sharing personal data outside the Company, only if the Company has a proper reason to do so. Specifically, the Company must have one or more of these reasons to use your personal data:

- To fulfill a contract, you have with the Company,
- To take any steps, at your request, prior to entering into contract with the Company,
- When it is the Company's legal duty under legislation and regulations applicable to the Company (such as banking legislation, insurance legislation investment services legislation and anti-money laundering legislation),
- When it is in the public interest,
- When it is in the legitimate interests of the Company\* or another person with whom the data are shared, provided these interests do not unfairly go against what is right and best for you,
- When you consent to the use

*\* A legitimate interest is when the Company has a business and/or commercial reason to use your personal data. The Company's legitimate interests are described in the table below.*

Here is a list of the ways that the Company uses personal data, the reasons the Company relies on to do so and what the Company's legitimate interests are.

What the Company uses your personal data for	Company's Reasons	Company's Legitimate Interests
<ul style="list-style-type: none"> <li>To review your application for the Company's products and services.</li> </ul>	<ul style="list-style-type: none"> <li>Pre-contractual steps.</li> <li>Company legitimate interests.</li> <li>Company legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Complying with regulations that apply to the Company.</li> <li>Being efficient in fulfilling the Company's legal duties and reviewing your application.</li> <li>Record keeping.</li> </ul>
<ul style="list-style-type: none"> <li>To deliver the Company's products and services.</li> <li>To make and manage customer payments.</li> <li>To collect and recover money that is owed to the Company.</li> <li>To manage the relationship with you and the way the Company communicates with you.</li> <li>To handle customers' claims.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Company legitimate interests.</li> <li>Company legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Being efficient in fulfilling the Company's legal and contractual duties.</li> <li>Complying with regulations that apply to the Company.</li> <li>Keeping proper and up to date records of the Company's activities.</li> </ul>
<ul style="list-style-type: none"> <li>To develop new ways to meet the Company's customers' needs and to grow the Company's business.</li> <li>To develop and carry out marketing activities.</li> <li>To study how the Company's customers use products and services from the Company.</li> <li>To provide information about the Company's products and services.</li> </ul>	<ul style="list-style-type: none"> <li>Your consent.</li> <li>Fulfilling contracts.</li> <li>Company legitimate interests.</li> <li>Company legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Working out which of the Company's products and services may interest you and tell you about them.</li> <li>Developing products and services, and what the Company charges for them.</li> <li>Defining types of customers for new products or services.</li> <li>Seeking your consent when the Company needs it.</li> <li>Being efficient in fulfilling the Company's legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To develop and manage the Company's brands, products and services.</li> <li>To test new products.</li> <li>To manage how the Company works with other companies that provide services to the Company and/or the Company's customers.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Company legitimate interests.</li> <li>Company legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Developing products and services, and what the Company charge for them.</li> <li>Defining types of customers for new products or services.</li> <li>Being efficient in fulfilling the Company's legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To detect, investigate, report and help to prevent and prosecute crime.</li> <li>To manage risk for the Company and the Company's customers</li> <li>To obey laws and regulations that apply to the Company and its business.</li> <li>To respond to requests for information from regulatory and other authorities.</li> <li>To respond to complaints and seek to resolve them.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Company legitimate interests.</li> <li>Company legal duty.</li> <li>Public interest.</li> </ul>	<ul style="list-style-type: none"> <li>Developing and improving how the Company deals with financial and other crime, as well as exercising the Company's legal duties in this respect.</li> <li>Complying with regulations that apply to the Company.</li> <li>Cooperating with the police and other Competent Authorities in Cyprus and the EU i.e. the Cyprus Insurance Companies Control Service.</li> <li>Being efficient in fulfilling the Company's legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To run the Company's business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance and audit.</li> </ul>	<ul style="list-style-type: none"> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Complying with regulations that apply to the Company.</li> <li>Being efficient in fulfilling the Company's legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To exercise the Company's rights set out in agreements or contracts.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> </ul>	

## types of personal data

The Company uses different kinds of personal data and groups them together like this:

types of personal data	description by way of examples
Contact	Your name, where you live and how to contact you, for example telephone, home address, work address and email address.
Socio-Demographic	This includes details about your work or profession, nationality, education, marital status, and where you fit into general social or income groupings.
Transactional	Details about payments to your accounts with the Company, insurance claims you make and tax information, direct debit data.
Contractual	Details about the products or services we provide to you.
Locational	Data we get about where you are, such as may come from your mobile phone and the address where you are located.
Behavioral	Details about how you use our products and services.
Technical	Details on the devices and technology you use.
Communications	What we learn about you from letters, emails and conversations between us.
Social Relationships	Your family, friends and other relationships.
Open Data and Public Records	Details about you that are in public records, such as information about you that is openly available on the internet.
Usage Data	Other data about how you use our products and services.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your specimen signature, passport, identity card, driver's license or birth certificate.
Consents	Any permissions, consents or preferences that you give the Company. This includes things like how you want the Company to contact you, whether you get paper statements, or prefer large-print formats.
National Identifier	A number or code given or issued to you by a governmental service to identify who you are, such as a National Insurance number, Tax Identification Code and the Identity Card number.

## special categories of personal data

The law treats some types of personal data as special. These include data concerning health and data relating to criminal convictions and offences.

The Company may collect health data in the context of application for Medical Insurance or raising a claim. The Company may also collect data relating to criminal convictions and offences of its customers and persons related to its customers in relation to Insurance Fraud cases as part of the Company's initial and periodic review of its relationship with its customers, as required by law.

## where the *company* collects personal data from

The Company collects personal data from Hellenic Bank Public Company Ltd, in the context of the assignment of insurance products as collateral for credit granted by Hellenic Bank and from these sources:

Data you give to the Company:

- When you apply for the Company's products and services
- When you talk to the Company on the phone or in its offices
- When you use the Company's website
- In emails and letters
- In insurance claims or other documents
- In financial reviews and interviews
- In customer surveys
- If you take part in Company's competitions or promotion campaign.

Data the Company collects when you use its services. This includes the amount, frequency, type, location, origin and recipients:

- Payment data.
- Profile data. This includes the profile you create to identify yourself when you contact the Company and how you use its services.

Data from third parties:

- Your authorized representatives
- Insurance agents and brokers
- Business introducers
- Financial Institutions
- Financial advisers
- Hellenic Bank Public Company Ltd
- Card associations
- Companies that process card payments, such as JCC Payments Systems Ltd
- Insurers
- Retailers
- Press, media and the internet
- Social networks
- Payroll service providers
- Public information sources such as Companies Registry and Land Registry
- Loyalty scheme operators
- Agents and contractors working on the Company's behalf
- Market researchers
- Medical practitioners and laboratories\*
- Government and law enforcement agencies.

\* For some insurance products, the Company may ask your general practitioner (GP) or other medical professional to send the Company a medical report. The Company will only do this with your prior consent.

## who receives your personal data and who the *company* shares your personal data with

Within the Company, access to your personal data are given to those officers who require such access to perform the Company's contractual and other legal obligations.

Access is also given to third party service providers and agents employed by the Company for these and other business purposes. Service providers and agents appointed by the Company are required to observe the

Company's instructions in relation to the processing of personal data. These are mainly organizations from the categories listed below:

- Agents and advisers that the Company collaborates with in introducing new business and uses to help run your policies and or claims, collect what you owe, and explore new ways of doing business
- Other credit and financial services institutions, comparable institutions and processors to whom the Company transfers personal data in order to perform the business relationship with you. Specifically: processing of company references, support / maintenance of Electronic Data Processing / Information Technology applications, archiving and file storage, document processing, call center services, profiling, compliance services, controlling, data screening for anti-money laundering purposes, data destruction, purchasing / procurement, space management, real estate appraisals, valuers and surveyors, collection, payment card processing (debit card / credit cards), customer management, collection of unpaid premiums marketing, media technology, reporting, research, risk controlling, expense accounting, telephony, video identification, website management.
- Any party linked with you or your business's product or service
- Companies we have a joint venture or agreement to co-operate with
- Organizations that introduce you to the Company
- Companies that the Company introduces you to
- Market researchers
- External legal advisors
- Price comparison websites and similar companies that offer ways to research and apply for financial products and services.

The Company may also provide your personal data to companies you ask the Company to share your data with.

The Company may be required to share your personal information with regulatory and/or governmental and/or law enforcement authorities or other public bodies in Cyprus and the European Union:

- The Insurance Companies Control Service, the European Insurance and Occupational Pensions Authority
- The police and MOKAS
- Tax authorities
- Other regulators, authorities and public bodies insofar as a statutory or official obligation exists.

The Company may need to share your personal information with other organizations to provide you with the product or service you have chosen:

- If you use a debit, credit or charge card in relation to any payment(s) to the Company for its services offered to you, the Company will share transaction details with companies which help the Company provide the relevant service to you (such as JCC, Visa and Mastercard).
- If you pay your policy by the use of direct debits, the Company will share your data with JCC.
- If you apply for insurance through Hellenic Bank Public Company Ltd, the Company may pass your personal or business details to the insurer, and onto any reinsurers.
- If you make an insurance claim, information you give to the Company may be put on a register of claims. This will be shared with other insurers and or reinsurers.
- If you have used your policy with the Company as a collateral for a loan or mortgage, the Company may share information with other lenders who also hold a charge on the property provided that the Company will receive appropriate consent by you.

The Company may, also, share your personal information if the ownership status of the Company changes in the future:

- The Company may choose to sell, transfer, or merge parts of its business, or its assets, or may seek to acquire other businesses or merge with them.
- During any such process, the Company may share your data with other parties. The Company will only do this if the other parties agree to keep your data safe and private.
- If there is such change to the status of the company, then other parties may use your data in the same way as set out in this privacy notice.

## how the *company* uses your personal data to make automated decisions

As a rule, the Company does not make decisions based solely on automated processing. If the Company uses automated procedures in certain cases, it will inform you of this separately to this privacy notice, provided that this is prescribed by law.

### profiling

In some cases, the Company processes your personal data automatically to evaluate certain personal aspects. The Company refers to this as "profiling". For instance, the Company uses profiling in the following cases:

The Company is required by law to establish anti-money laundering and anti-fraud measures. Data evaluations are also carried out (in payment transactions, among other things) in this context. These measures also serve to protect you.

## sending personal data outside of the European Economic Area (the "EEA")

The Company will only send your personal data to a country outside the EEA (a "third country"):

- If this is required by reinsurance associates of the Company within the context of executing your policy or claim
- if this is prescribed by law (for example, reporting obligations under tax law);
- if you have given us your consent; or
- in the context of data processing undertaken by third parties on behalf of the Company and according to the Company's instructions.

If the Company does transfer your personal data to a third country, the Company will make sure that your data is protected in the same way as if it was being used in the EEA. The Company will use one of these safeguards:

- Transfer it to a third country with privacy laws that give the same protection as the EEA, as certified by an adequacy decision of the European Commission. Learn more about this on the **European Commission** website.
- Put in place a contract with the recipient that means they must protect it to the same standards as applicable in the EEA. Read more about this on the **European Commission** website.
- Transfer it to organizations in the USA that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the USA and EEA countries. It makes sure those standards are similar to what is used within the EEA. Learn more about this on the **European Commission** website.
- Transfer it to organizations that comply with binding corporate rules or an approved code of conduct or certification mechanism that require its protection to the same standards as applicable in the EEA.

## requirement to give personal data

Within the scope of your business relationship with the Company, you must provide personal data which is necessary for the initiation and execution of a business relationship and the performance of the associated contractual obligations or which the Company is legally obligated to collect. As a rule, the Company would not be able to enter into any contract or execute the order without these data or the Company

may no longer be able to carry out an existing contract and would have to terminate it. When requesting the provision of data from you, the Company will tell you whether you are required to provide these data and of the consequences if you do not.

## marketing

The Company may use your personal data to tell you about services, products and offers that may be relevant for you. In order to decide which services, products and offers to tell you about, the Company studies the personal data the Company has on you to form a view on what the Company thinks you may want or need, or what may be of interest to you.

Up to now the Company was allowed to use your personal data to send you marketing messages if the Company had your consent or if you were a customer of the company before July 2012 (for a special rule applicable to emails, please see the next paragraph). Under the GDPR, the Company can use your personal data to send you marketing messages to serve its legitimate interests (as defined above in Reasons for processing your data), provided the interests of the Company do not unfairly go against what is right and best for you. The Company does not need your consent to send you these marketing messages, but you have the right to ask the Company to stop sending you marketing messages by contacting the Company at any time (in the manner described below in *Objecting to the Company's use of your personal data*).

If you are a customer of the Company and you have provided your email address in the context of services provided to you, the Company may use your email address to send marketing messages to you, unless you have objected. In each email message you receive, the Company will let you know how you can exercise your right to object to receiving marketing emails from the Company.

## how long can the *company* keep your personal data

The Company processes and stores your personal data as long as necessary for the performance of the Company's contractual and other legal obligations. In this regard, it should be noted that your business relationship with the Company is a continuing obligation designed to last for several years.

After you stop being a customer of the Company, the Company may keep your personal data for up to 10 years for one of these reasons:

- To respond to any questions or complaints.
- To show that the Company treated you fairly.
- To maintain records according to rules that apply to the Company such as under applicable tax, banking, insurance and money laundering laws and regulations.
- To preserve evidence that may be needed for the establishment, exercise or defense of legal claims.
- If it is the Company's obligation under legislation and regulations (such as banking legislation, insurance legislation investment services legislation and anti-money laundering legislation).

If the Company holds your personal data because you are related to a customer of the Company (e.g. you are a representative, beneficial owner or authorized officer), the Company may keep your personal data for any of the above reasons for up to 10 years after the end of the relationship of the Company with the relevant customer.

The Company may keep your personal data for longer than 10 years from the end of the customer relationship if the Company cannot delete it for legal, regulatory or technical reasons such as to preserve evidence for legal or other proceedings which have not come to a conclusion.

The Company may also keep your personal data for a longer period for statistical purposes. If the Company does, it will make sure that your privacy is protected and only use it for those purposes.

## your data protection rights under the GDPR and how to exercise them

Your data protection rights, granted by the GDPR, are described below. You may exercise them at any time in any of the following ways:

- by calling the Company at **22743743**;
- through email at **pancyprian@hellenicbank.com**; or
- submitting your request in writing to any office of the Company.

### *obtaining a copy of your personal data*

You have the right to obtain from the Company confirmation as to whether or not your personal data are being processed and to access your data.

### *correction of inaccurate or incorrect information*

You have the right to question any personal data the Company holds about you that you think is wrong or incomplete. If you do, the Company will take reasonable steps to check its accuracy and correct it.

### *objecting to the company's use of your personal data*

You have the right to object to the Company's use of your personal data and ask the Company to stop using your data in any of the following circumstances:

- You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is intended by the Company to safeguard its legitimate interests or to serve the public interest. If you lodge an objection, the Company will no longer process your personal data unless the Company can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or unless the processing is bound by the Company's legal duty under legislations and regulations or for the establishment, exercise or defence of legal claims.
- You have the right to object to the processing of your personal data for marketing purposes. If you lodge such an objection, your data will no longer be processed for such purposes.
- You have the right to object to the processing of your personal data for statistical purposes, on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

### *right to be forgotten*

You have the right to have the Company to delete or remove your personal data in the following circumstances:

- The processing of the data by the Company is no longer necessary for any of the reasons the data were collected and used
- You have withdrawn your consent and there is no other reason for the processing of these data
- You have successfully objected to the processing of the data by the Company
- The data have been unlawfully processed
- Deletion is required by law

There may be a legal duty under legislations and regulations or other reasons for the Company is required to keep your personal data. But please inform the Company if you think that your data should be deleted.

### *restriction of processing*

You also have the right to restrict the Company's use of your personal data in the following circumstances:

- pending verification by the Company of data the accuracy of which you have contested
- the processing is unlawful but you do not want your data to be erased
- the Company no longer needed the data but you do not want them to be erased because you need them for the establishment, exercise or defence of legal claims
- pending the Company's assessment where you have objected to processing intended to safeguard the Company's legitimate interests

### *withdrawing your consent*

Where the Company relies on your consent for the processing of your data, you can withdraw your consent at any time. If you withdraw your consent, the Company may not be able to provide certain products or services to you. If this is so, the Company will inform you before giving effect to your withdrawal notification.

### *data portability*

You have the right to receive your personal data from the Company in a format that can be easily re-used. You can also ask the Company to pass on your personal data in this format to other organizations, where this is technically feasible. This right relates to the data which you have provided to the Company and which the Company processes electronically in reliance on your consent or for fulfilling the contract between you and the Company.

### *filling a complaint*

If you are unhappy with how the Company has used, or uses, your personal data, please let the Company know. You also have the right to complain to the Office of the Commissioner for Personal Data Protection.

### *changes to this privacy notice*

This Privacy Notice sets out the information that the Company must provide to you for the purposes of the GDPR which is applicable as of 25 May 2018. Any information in relation to the processing of personal data that is included in any of the Company's existing circulars, manuals and associated forms on matters which are covered by this Privacy Notice are deemed to be superseded by the information in this notice.

The Company may revise or update this privacy notice from time to time. The new version of this notice will be available on the Company's website. In case of significant changes (such as in relation to the reasons for which the Company uses personal data or to the way in which you may exercise the rights described above), the Company will bring these changes to your attention.

