



Privacy Policy and Personal Data

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I. General provisions

UAB OPS International (hereinafter – **OPS Group** or **we**) is a group of insurance assistance, customer service and claims management companies committed to protecting and respecting your privacy in accordance with European Union legislation and national legal acts, as well as contracts. Please read this Privacy Policy carefully to understand why and how we collect and process your data.

II. What personal data do we process and for what purpose?

1. We process your personal data in the performance of the claims administration function transferred (delegated) to us under contracts by insurance companies in accordance with the Law on Insurance, the Civil Code of the Republic of Lithuania, Regulation (EU) 2016/679 of the European Parliament and of the Council of 26 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) (hereinafter – **the GDPR**), as well as the provisions of other legislation in order to ensure the proper provision of insurance service and carry out related claims administration activities, including, but not limited to, consultations, assistance in filling out documents under the terms of insurance, registration of claims, identification of the insured person, collection of required data and documents on the circumstances of the insured event, arrangement of urgent assistance, etc.

Therefore, we are the processor of your data and the controller of your data is your insurance company. As the data controller, we only process personal data of our employees and, in certain cases, our business partners.

2. OPS may provide the following assistance services: (i) insurance of travel expenses and cancellation; (ii) insurance of medical expenses and accident insurance; (iii) insurance of medical expenses, including repatriation services; (iv) baggage delay and loss insurance; (v) other services.
3. We start processing your personal data from the moment you notify of a potentially insured event under the procedure set out in the terms of insurance of the insurance company (by telephone, e-mail, on the insurer's or our website or mobile app).
4. We may process your personal data for different purposes, depending on the nature of the assistance services:
 1. Your identification details: name, surname, date of birth, personal ID, gender:
 - a. to identify you in the provision of any assistance service (in the performance of contract with the Data Controller, *Article 6(1)(b) of the GDPR*);
 - b. to administer an insured event in a proper manner in the provision of any assistance service (in the performance of contract with the Data Controller, *Article 6(1)(b) of the GDPR*).
 2. Your contact details: residential address, e-mail address, telephone number:
 - a. to administer an insured event in a proper manner in the provision of any assistance service (in the performance of contract with the Data Controller, *Article 6(1)(b) of the GDPR*).
 3. Your financial data: payment card type, validity status as of the date of the event, details of the bank that issued the card, bank account number:
 - a. to administer an insured event in a proper manner in the provision of any assistance service (in the performance of contract with the Data Controller, *Article 6(1)(b) of the GDPR*).
 4. Data of communication with you: telephone conversations, correspondence, invoices, claim summaries:
 - a. to administer an insured event in a proper manner in the provision of any assistance service (in the performance of contract with the Data Controller, *Article 6(1)(b) of the GDPR*).
 5. Your data on the nature of your employment, remuneration, other professional activity:
 - a. to administer an insured event in a proper manner in the provision of certain assistance services (in the performance of contract with the Data Controller, *Article 6(1)(b) of the GDPR*).
 6. Your health data: medical history, data on disability, harmful habits, use of prescription drugs:
 - a. to administer an insured event in a proper manner under the insurance of medical expenses and accident insurance (with your consent and in the performance of contract with the Data Controller, *Article 9(1)(a) of the GDPR*).
 7. Your travel data: destination, type of travel, ticket price, booking documents, reservations:
 - a. to administer an insured event in a proper manner in the provision of any assistance service (in the performance of contract with the Data Controller, *Article 6(1)(b) of the GDPR*).
 8. Criminal record data: data on judgments of conviction and criminal offences where such data are necessary in order to examine an insurance claim or assess the risk of money laundering and terrorist financing, as well as to assess the employee's compliance with the requirements of Article 158¹ of the Law on Insurance:
 - a. to administer an insured event in a proper manner in the provision of any assistance service (in the performance of contract with the Data Controller, *Article 6(1)(b) of the GDPR*);
 - b. to conclude an employment contract with our employee (*Article 6(1)(c) and Article 10 of the GDPR, Article 158¹ of the Law on Insurance*).
 9. Data of children (up to 16 years of age): name, surname, date of birth, personal ID, gender:
 - a. to administer an insured event in a proper manner in the provision of any assistance service where the child is a beneficiary or an insured person under an insurance contract (*consent of the*

parents or guardians, Article 6(1)(a) and Article 8 of the GDPR and in performance of contract with the Data Controller, Article 6(1)(b) of the GDPR).

III. What personal data do we provide to third parties?

OPS Group does not disclose the personal data of data subjects to third parties except in the following cases:

1. the disclosure has been provided for in the main contract with the Data Controller;
2. to the business partners of OPS Group who provide IT, accounting, auditing, archiving or legal services – only after obtaining an undertaking from the partners to protect and properly process the personal data transferred;
3. to law enforcement / supervisory authorities / courts under the procedure provided for by legal acts of the Republic of Lithuania when necessary to prevent or investigate breaches of law.

IV. What data do we transfer to third countries (outside the EU/EEA)?

In certain cases, we have to transfer your personal data to third countries (outside the EU/EEA) in the performance of obligations under the contract with the Data Controller (insurance company), but only if the insured event occurred in a country outside of the European Union (EU) and only if this is provided for in our main contract with the Data Controller. Personal data that are transferred outside the EU are protected by clauses of the data processing agreement made by the Data Controller (insurance company) and by other protection mechanisms approved in the European Union.

V. How long do we keep your personal data?

We will keep your personal data for as long as specified in our contract with the Data Controller. As a general rule, personal data are kept for as long as necessary to comply with contractual obligations or legal requirements. In some cases, we will retain personal data not longer than for one year from the date on which we have received compensation from the Data Controller for the disbursed reimbursement of claim for a closed claim. Upon expiry of the retention period, we cease processing the personal data and erase or destroy them, unless we have another legal basis for processing such personal data as a separate Data Controller.

VI. What rights do you have as a data subject?

You, as a subject of personal data, have the following rights:

Your right	Description
Right to access your personal data	You have the right to get from us a confirmation whether we process your personal data. Where we process your personal data, you have the right to access the personal data processed along with certain additional information. Such additional information includes personal data processing purposes, personal data categories and personal data recipients. We will provide you with a copy of your personal data, if that does not violate the rights and freedoms of other persons.
Right to request rectification of	You have the right to revise any inaccurate personal data concerning you and, considering the processing purposes, supplement any incomplete personal data

personal data	concerning you.
Right to request erasure of your personal data	<p>You may exercise this right where:</p> <ul style="list-style-type: none"> (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) you withdraw your consent and there is no other legal basis to process the data; (iii) the personal data were processed unlawfully. <p>Please note that you will not be able to exercise this right in certain cases due to applicable exceptions. Such exceptions cover the cases when the processing of personal data is necessary in order to:</p> <ul style="list-style-type: none"> (i) to exercise the freedom of expression and information; (ii) to comply with legal obligation to which we are subject; or (iii) to establish, exercise or defend legal claims.
Right to restrict data processing	<p>This right may be exercised in the following cases:</p> <ul style="list-style-type: none"> (i) when you contest the accuracy of the personal data; (ii) when the personal data are processed unlawfully, however, you are not willing to have them erased; (iii) when the personal data are no longer necessary for the purposes of the processing, but you request them for the establishment, exercise or defence of legal claims. <p>Where the personal data processing is restricted on this basis, we can continue storing your personal data, however, we will no longer process them, except in the following cases:</p> <ul style="list-style-type: none"> (i) for the establishment, pursuit and defence of legal claims; (ii) for the protection of the rights of other natural persons or legal entities; or (iii) for reasons of substantial public interest.
Right to object	The right to object to the processing of your personal data for the reasons relating to your specific situation, however, only to the extent your personal data are used by us on the basis of your consent.
Right to personal data portability	<p>Where the legal basis for processing personal data is:</p> <ul style="list-style-type: none"> (i) your consent; or (ii) the contract performance or pre-contractual actions at your request.
Right to obtain your personal data in a structured, commonly used and machine-readable format	You will not be able to exercise this right where it can have a negative impact on the rights and freedoms of other persons.

Right to lodge a complaint concerning the processing of personal data	If you believe that we violate your right to the protection of personal data in the processing of your personal data, you have the right to lodge a complaint with the State Data Protection Inspectorate, registered office address: A. Juozapavičiaus g. 6, LT-09310 Vilnius, www.ada.lt .
Right to withdraw your consent to the processing of personal data at any time, if your personal data are processed on this legal basis	You may withdraw your consent to the processing of personal data at any time at your convenience. The withdrawal of your consent will have no impact on the lawfulness of data processing before the withdrawal.

VII. How do we use cookies?

Our website uses cookies. These are small data files that are transmitted from the website to your computer (device). We use cookies in order to provide and/or improve services on the website and to display advertisements properly according to your interests.

By browsing the website, you agree to the use of essential cookies. The website would not be able to function without essential cookies. You can also consent to the use of other cookies: preferences, statistics and marketing.

Preference cookies are used for the website to remember information that determines the performance and appearance of the website, such as the language you choose or the region you are in. Statistics cookies help to analyse the use of the website in order to improve the services of the website. Marketing cookies help us to provide you with advertisements and/or promotional ads according to your interests.

If you do not agree to the use of certain cookies, you can disable them (except essential cookies).

VIII. How do we ensure the security of your personal data?

We are the processor of your personal data and ensure the measures of personal data protection as provided for in our contract with the Data Controller (the insurance company). The data protection measures we have implemented ensure the authenticity, integrity and confidentiality of your data. The data protection measures include, but are not limited to, the protection of personnel, information, IT infrastructure, internal and public networks, as well as the security of office buildings and technical installations.

IX. Changes to the provisions on the protection of your privacy

We review this Privacy Policy periodically in order to ensure that it reflects how we process your data. Once any changes are made, they are made public on the website.

X. How can you contact us?

You can contact us regarding the exercise of your right to the protection of your personal data by e-mail: info@ops24.eu L. Zamenhofo g. 3, Vilnius, LT-06332.