

TBC INSURANCE

Privacy Policy

JSC TBC Insurance is an insurance company licensed under the laws of Georgia.

Identification code: 405042804.

Legal address: 24B Al. Kazbegi Ave., Tbilisi, Georgia

JSC TBC Insurance (hereinafter referred to as the Company or the Insurer) acknowledges and assumes responsibility to strictly comply with the legislation in force when processing personal data, taking into account international best practices, including the recommendations (Nº R (90) 19 and Nº R (85)20) of the Council of Europe.

Objectives of personal data processing policy and extent of applicability

The policy set forth herein (hereinafter referred to as the "Policy") applies to all natural persons (Company customers, employees, contractors, etc. - hereinafter referred to as the "Data Subject"), whose personal data is processed by the Company (hereinafter referred to as data).

Data protection is an important value to the Company as a basis for establishing a business relationship with any reliable and bona fide insurance company by any subject, and the objective of this policy is to provide the interested party with basic information on how data are processed by the Company and protected by the Company in accordance with applicable law, ensuring security of personal data, as well as practical implementation of statutory and regulatory enactments and other documents to protect personal data in the Company.

This Policy constitutes a part of contracts, concluded by data subjects with the Company, or/and procedures/standards established by the Company, in case of controversy of which, the bilateral contracts (if any) will prevail.

How we use your personal data

This notice refers to the protection mechanisms available in JSC TBC Insurance against unauthorized access to personal data, by applying which the Insurer protects your personal data. The latter includes information received by the Insurer when providing you with services, which, in accordance with Georgian law, are also further used for direct marketing purposes.

The purpose of the notice is to provide you with information on the principles of our work and the mechanisms of your legal protection when processing personal information.

Promise to protect the privacy of personal data

We, JSC TBC Insurance team, promise:

- To take care of the security and protection of your personal data;
- Not to use your data illegally;
- To provide you with complete and exhaustive information regarding the processing of your personal data at any time.

How does the law protect you?

Similar the promise to protect the privacy of personal data, these data are protected by Law of Georgia on Personal Data Protection. Under the law, you have the right to ask us for information about your data processing. You have the right to receive the following information:

- which personal data are being processed;
- the purpose of data processing;
- the legal grounds for data processing;
- the ways in which the data were collected;
- to whom your data were transferred;
- the grounds and purpose of the disclosure,

You can request a copy of information processed by us.

By virtue of law you have the right to request the correction, update, addition, blocking, deletion, or destruction of your data, if data are incomplete, inaccurate, not updated, or were illegally collected and processed. We act within Georgian law, which may prevent us from deleting your personal data immediately. Such an obligation may arise from Money Laundering Regulations, tax laws, Georgian insurance law, and consumer protection laws.

The Insurer shall be obligated to provide you with this information at your request. We may use personal data only if we have a specific contractual and/or legal basis for doing so.

The Insurer has a legal basis for using your data, which implies a business and/or commercial purpose existence. It is important that even in this case, the processing of data by the Insurer is not aimed at infringement of your interests.

The purposes and the legal basis, against the background of which we process your personal data, are given below. On a case-by-case basis, we present the purposes of using your data and our legal basis:

What do we use your personal data for?	Our goals	Our legal basis
• For relations with you; • To meet your requirements, to develop new ways of cooperation and to develop our business; • To develop and implement marketing activities; • To study how customers use our products and services; • To get advice and recommendations in relation with our products and services; • To develop/manage our brands, products and services; • To provide our products and services.	• Updating data, identifying products and services interesting for you and providing you with such information; • Developing products and services; • Identifying focus groups of customers to offer them new products and services; • Effective implementation of our legal duties; • Effective implementation of our legal duties and contractual obligations;	• Your consent; • Fulfilment of contractual obligations; • Our legal interests; • Our legal duties.
• To detect, investigate financial crime, for reporting and prevention; • To comply with laws and regulations relevant to us; • To respond to complaints and find ways to resolve them.	• Development and improvement of the action strategy against financial crime, as well as the fulfilment of legal duties from this point of view;	• Our legal interests; • Our legal duties.
• To conduct our business effectively and efficiently, which includes managing our financial position, business opportunities, planning, communications, and corporate management, and audit	• Ensuring compliance with regulations relevant to us; • Effective implementation of our legal duties and contractual obligations.	• Our legal interests; • Our legal duties.

management		
• To exercise rights - obligations assumed under contracts.	• Fulfilment of contractual obligations.	• Assure compliance with relevant regulations; • Effective implementation of our legal duties and contractual obligations.

Groups of personal data

We use various personal data and group them as follows:

Types of personal data	Description
Financial	Details of bank accounts
Contact information	Residential address and contact information, phone number and email
Contractual	Detailed information on products provided and service rendered by us to you;
Behavioural	Detailed information on how you use our products and services;
Technical	Information on equipment and technologies used by you;
Communicative	Information obtained by the Insurer from letters, emails on you and any third parties indicated by you, by other means of communications between the Client and the Insurer.
Documentary data	Information contained in documents of various formats and their copies about you and the third parties indicated by you. Such documents include a passport, identity card, birth certificate, driving license and other identity documents.
Special category data	Georgian law on personal data protection and other regulations treat some personal data as special data. This type of data can be processed only based on a written consent from you or if such processing serves a purpose strictly defined by law. Such data also

	includes medical information.
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If the Data Subject provides the Company with information about third parties (including, for example: customers, family member and/or a person related to him/her, employees) the Data Subject confirms that he/she has received full authorization and assumes responsibility for the processing of said data by the Company.

From what source do we collect personal data?

We can obtain personal data about you from the sources provided by you to the Insurer and listed below. We obtain information from you in the following cases:

- When you contact us to obtain our products or services;
- When you contact us by telephone or when you visit a branch office;
- When you use our website, mobile application and web chat;
- When you send letters by post or by email;
- From publicly available sources.

Cookies and other digital tools

We use cookies and various digital tools to monitor consumer behaviour on our website to ensure that we offer the best experience, when you are on our website and to be able to improve the quality of our service constantly.

On our website we collect information about consumer navigation and behaviour in particular:

- IP address, device type, operating system, and browser from which the web page is accessed;
- We collect information about open pages on our website, session duration, and various session parameters;
- We collect information about consumer activity on the website in the form of video recordings, and we also observe consumer behaviour through website hotspots;
- Information about the actions that took place on our web page: filling out forms, using interactive elements, etc;
- The process of filling the website fields, time, and form.

We use the collected information:

- To maintain the website statistics, in order to optimize the processes, fields and design of our website;
- To improve UX/UI of the website, to identify and troubleshoot the website;
- To protect the website users and to prevent fraudulent actions;
- To avoid money laundering, financing of terrorism and detecting and avoiding other criminal activities;
- To monitor the flow of consumers on the website, to evaluate the effectiveness of marketing campaigns and conduct various analytical studies;
- The information collected makes it possible to adapt the website and its components to the needs of consumers.

We also use third-party cookies for marketing and analytical purposes.

Before using the website, you have the opportunity to agree to the use of cookies and by clicking the "I accept" button you consent to the monitoring of consumer behaviour. However, if you do not agree to the Cookie Policy, you will continue to use the website, but the above action will be considered your consent to the above.

If you wish to restrict, block the cookies, which are set by our website, you can do this through your browser settings. Please note that by deleting or blocking cookies, our services offered by us may not always be able to function correctly.

Information obtained from third parties

We have the right to request and receive information from third parties, such as our group member companies or the Insurance - Information Bureau, both positive and negative information stored in their electronic database, as well as from the electronic database of the LEPL Public Services Development Agency and LEPL Service Agency of the Ministry of Internal Affairs. This is realized in accordance with the Personal Data Protection Law of Georgia, if necessary, upon your prior consent, consent provided by law and/or agreement.

Who do we disclose your personal data to?

We may disclose your personal data in cases determined by Georgian law, or to other organizations that must provide you with the product or service you have selected, for example:

- If you insure through us, we may transfer your personal or business information to any reinsurer;

- If you have an insurance claim, the information provided by you to us may be added to the Claims Register. This information will become available to other insurers.

We may also disclose your personal data if the insurer's structure will change in the future, for example:

- We may sell, transfer, merge businesses or assets part;
- In carrying out any of the above processes, your data may be shared with other parties. Before disclosing such information, however, these parties must agree to keep your information secure and confidential;
- If our group structure changes, other parties may use your data only in the manner, and to the extent regulated herein, and by law.

Based on the contractual relationship we have the right to pass on your and your authorized drivers' positive and negative information to the Insurance - Information Bureau.

Sometimes, in order to make an automatic decision, we use personal data on hand or such personal data, which we are authorized to obtain from other persons under law or contracts concluded with you. This helps us in ensuring quick, legal and effective decisions making. These automated solutions affect the quality of the products and services, which are offered by us now or will be offered in future.

Types of automatic decisions made by us are given below:

Price formation

We make decisions on prices of certain products and services based on available information.

Adapting products and services to customer needs

We segment our customers by groups. These groups are termed as consumer segments, and we use them to study your needs and based on the gained knowledge we try to make desirable and favourable decisions for you. This process helps us in creating the products and services that are relevant to different customer segments and to manage the relationship with them.

Fraud detection

Your personal data helps us in determining whether our services may be used for fraud or money laundering. If we discover a risk of fraud, we reserve the right, for your safety, to temporarily suspend services or refuse to provide related services.

We use data

Data are used and disclosed only for data processing based on the contract concluded with the Data Subject when using certain insurance products/services, and in the manner prescribed by the laws.

The company uses data:

- When identifying, rechecking/verifying the customer in providing insurance services;
- For internal administrative or business operations by procedures/standards of the Company;
- Only when necessary and in the manner prescribed by law, when considering complaints, questions, applications, appeals from authorized bodies;

Each disclosure of data on a concrete data processing (or disclosure) must be recorded by responsible person in accordance with the rules set out in the procedures.

Marketing

We may use your personal data to let you know about specific products and offers.

We have access to your personal data within the scope shared by you with us or collected by us in the course of providing services to you using the means on hand.

We examine your data to find out what you need, what you're interested in, or what desires you may have. That's how we decide what product, service or offer might be suitable for you.

We use your personal data and send marketing notices only when we have your consent or legitimate interest. We promise that our activities are never illegal, improper or against your interests.

You have the right to contact us at any time and to ask to stop sending marketing notices. We respect your wishes and upon receipt of such notice, we will stop using your personal data for direct marketing purposes. Satisfying the request to stop using for marketing purposes will not affect or constitute a waiver of services from the company.

Your safety and interests are important to us, for which you will in any case receive notification of the products offered to you and of changes made by the Insurer in the terms of service.

Video record

For purposes defined by applicable law, video may be recorded in the company territory.

The video is recorded for the safety and protection of the Company.

The Company provides warning signs regarding the video recording in a visible location.

Data disclosure to foreign countries

In order to provide services and to ensure smooth operation, the Company may transfer data to another country or international/foreign organization in the presence of appropriate legal reasons, only if appropriate data protection guarantees are provided in this country or international/foreign organization.

When transferring data, the Company may need to obtain permits from a supervisory company in the field of personal data protection. In the manner prescribed by law, the Company does not need the permission of the supervisory company, when the list of countries, having adequate guarantees for the protection of personal data, has already been established by a relevant regulatory enactment of the supervisory company.

When transferring to a foreign state, the company provides adequate guarantees for the protection of personal data on the basis of agreements concluded with legal entities or individuals, or an international organization.

Trans-border transfer of personal data requires the written consent of the Data Subject.

Transfer of personal data to other country or international/foreign organization is possible without the consent of the Data Subject in the following cases:

- When executing a contract, to which the personal data Subject is a party;
- When protecting the life, health, or other vital interests of the data subject, when obtaining the written consent of the personal data Subject is impossible due to his or her physical condition.

Data storing

Data are stored by the Company only for the period necessary to achieve the purpose of data processing.

During the data storage period, data will be available only to authorized persons of the Company for certain purposes.

With regard to the Company's objectives, Data are stored mainly within the statute of limitations. The specific form and period of storage are determined by law and/or the Company's internal procedures/standards.

If you believe that any information kept by us is incorrect or incomplete, please contact us to fix your doubts. We will take all reasonable steps to check and correct these problems.

You have the right not to consent to the use of your personal data, or to request its deletion, removal or use termination, unless we have a legal basis to store data.

Contact us if you disagree with use of your data by us, if you have a question or if you wish to annul or limit the use of your data.

How to contact us

If you have any questions about our privacy policy, our general rights-obligations or our processing of your data, please contact us through the following communication channels:

Online chat

Talk to our consultants online, by emailing us at:

+995 32 242 22 22 call us within 24 hours, 7 days a week.

Visit our branch

Send a written notice of your request (indicate name, surname and policy number) to the address: 24B Al. Kazbegi Av., Tbilisi