

Privacy Policy

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1. Identification and contact details of the Data Controller.

Liberty Seguros, Compañía de Seguros y Reaseguros, S.A., with registered office at Paseo de las Doce Estrellas, 4, C.P. 28042 Madrid, with VAT number A-48037642, and telephone 932144031 (hereinafter “Liberty Seguros” or the “Insurer”) is the data controller for the personal data that is processed within the framework of the contractual relationship with customers, as well as through the Customer Portal and the different communication and contracting channels made available to customers by Liberty Seguros. This clause provides information on how the Insurer will use your personal data.

In addition, the purpose of this Privacy Policy is to provide information on the processing of personal data and the rights under the General Data Protection Regulation (“GDPR”) to customers, to those who have requested a quote, insured persons, policyholders, to those who are involved in a claim, as well as to anyone acting on their behalf, including when they file a claim, exercise a right or participate in contests and raffles organized by Liberty Seguros.



Liberty Seguros has a Data Protection Officer appointed before the Agencia Española de Protección de Datos, who can be contacted at the following address dpo@libertyseguros.es. If you have any questions regarding the processing of your personal data, please contact the Data Protection Officer at the aforementioned address.

2. General information: description of the information contained in the privacy policy.

In this privacy policy you will find tables identifying each of the different services offered by Liberty Seguros.

These informative tables will detail:

- The purposes of the processing of your personal data, i.e. the reason why Liberty Seguros processes your personal data.
- The legal basis that allow the processing of data by the Insurer for each of the purposes indicated.
- The possible communication of your data to third parties, as well as the reason for such communication. For these purposes, we do not transfer your personal data to third parties except when there is a legal obligation (Tax Authorities, Judges and Courts, Security Forces and Bodies...), in the case of other companies of the Liberty Mutual Group within the framework of a joint internal administrative management of customer data, never for commercial purposes, or when we expressly indicate it in the table that appears below. On the other hand, Liberty Seguros data processors may have access to your personal data, i.e. service providers that have access to your personal data for the performance of their services. Service providers who access your personal data are generally providing services relating to information systems, technology, telecommunications, cloud computing and network security, anti-fraud, finance and billing, profiling for statistical-actuarial purposes, private investigators, claims management or assistance



services, reinsurers, professional services where necessary (including solicitors and barristers) or customer services. The table below will indicate those other areas where Liberty Seguros service providers may have access to your data from time to time. You can request more detailed information about the recipients of your data by sending an e-mail to the address dpo@libertyseguros.es indicating the specific processing activity about whose recipients you would like information.

In addition to the above, Liberty Seguros may share your data with the following common databases of the insurance sector, considering the necessity for compliance with the legal obligations of detection, prevention and prosecution of insurance fraud, established in article 100 of Law 20/2015, of July the 14th, on the organization, supervision and solvency of insurance and reinsurance entities, in the case of SIAPTRI and SIPFSRD, as well as those established in article 2.7 of the Consolidated Text of the Law on civil liability and insurance in the circulation of motor vehicles in the case of SIHSA. In particular, and in accordance with the provisions of the Code of Conduct Regulating the Processing of Personal Data in the Common Information Systems of the Insurance Sector, promoted by UNESPA, we inform you about the processing of your personal data in:

(a) **Automobile History Information System (SIHSA):** Liberty Seguros will share the historical data of the policies and claims to the Automobile Insurance Historical Information System, for which it is joint controller for the processing. Its purpose is to facilitate, at the time the contract is signed, rigorous and contrasted information on the accident rate data by sharing the information obtained through policies and claims, of the last five years, in the terms expressed in the Law on Civil Liability and Insurance in the Circulation of Motor Vehicles. To exercise your data protection rights, you can contact TIREA, Ctra. Las Rozas a El Escorial Km 0.3 Las Rozas 28231 MADRID.

You can find further data protection information on the UNESPA (www.unespa.es) and TIREA (www.tirea.es) websites.



(b) **Total Loss, Theft and Fire Automobile Information System (SIAPTRI)**: Liberty Seguros will share the historical data on the number of claims related to your insurance or claims in which you have been involved to the Total Loss, Theft and Fire Information System, for which it is joint controller for the processing. Its purpose is to facilitate the automated identification of possible situations of anomaly and risk of fraud, to cooperate with the Security Forces and Corps by facilitating the investigation of possible crimes of theft and fraud, among others, related to insured motor vehicles; and cooperate with CENTRO ZARAGOZA, the Security Forces and Corps, the General Directorate of Traffic and the affected insurance entity in the identification and location of stolen and indemnified vehicles. To exercise your data protection rights, you can contact TIREA, Ctra. Las Rozas a El Escorial Km 0.3 Las Rozas 28231 MADRID.

You can find further data protection information on the UNESPA (www.unespa.es) and TIREA (www.tirea.es) websites.

(c) **Miscellaneous Insurance Fraud Prevention Information System (SIPFSRD)**: Liberty Seguros will share the accident data related to your insurance and/or your accident to the Fraud Prevention Information System in insurance of various branches, among which is the insurance contracted by you or the accident in which you have been involved, having the condition of joint controller for the processing. Its purpose is the prevention and detection of fraud, either warning the insurance company once the policy has been issued, or detecting fraud already committed in declared claims. Likewise, its purpose will be to cooperate with the Security Forces and Corps by facilitating the investigation of possible crimes of theft and fraud, among others, related to the insured goods. To exercise your data protection rights, you can contact TIREA, Ctra. Las Rozas a El Escorial Km 0.3 Las Rozas 28231 MADRID.

You can find further data protection information on the UNESPA (www.unespa.es) and TIREA (www.tirea.es) websites.



- The existence of potential international data transfers. For these purposes, much of our processing activities requires the transfer of data internationally to technological service providers or entities of the group to which Liberty Seguros belongs, located in the United States, United Kingdom, India, Colombia, Brazil, Australia, Malaysia and Canada, for which the pertinent Standard Contractual Clauses apply. You can request more detailed information regarding the international transfers of your data or the guarantees applied by sending an e-mail to dpo@libertyseguros.es, indicating the specific processing activity about which you would like to receive information about the guarantees applying.
- The retention period of the data you provide us with. For this purpose, we keep your personal data for the duration of the contractual relationship, or for a longer period if you have given us your consent. Subsequently, your data will remain blocked to deal with judicial, administrative or tax claims, during the statute of limitations period determined by the applicable regulations.

3. Necessary, up-to-date and accurate information

LibertySeguros will process personal data, including health data, provided directly by the interested party or obtained by other lawful means. Data may be received from third parties, such as lawyers, experts, insurance companies, clinics and hospitals, among other entities whose information must be communicated to Liberty. In addition, the personal data subject to processing may refer to the policyholder, insured parties, third-party claimants, representatives, witnesses and others.

The personal data processed can be found among the non-exhaustive list of the following categories: identification data (for example, name, gender, Social Welfare number, carplate...), location data (for example, address, eircode, postal code...), financial data or bank data (for example, bank account number, credit/



debit card number...), metadata (for example, IP address,...), data of the policy (for example, policy number, insured property, historical data related to the policy, health data...), claims data (for example, accident information, photographs, health data,...) and data against the fraud and money laundering (for example, criminal records...).

You are required to provide us with the data we request through various means of collection, including the digital portals of Liberty Seguros, email, telephone or paper. If you do not provide us with all information requested, we may not be able to send you communications or provide you with the insurance related services you have requested. Likewise, by fulfilling and sending the required information, you declare that the information and data you have provided is accurate and true.

So that the information provided is always up to date and contains no errors, you must inform Liberty Seguros, as soon as possible, on the changes and corrections of your personal data that may occur, using the form you will find at the following [link](#).

4. Exercising your rights

You can exercise the following rights:

1. right of **access** to your personal data to find out if it is being processed, and if so, what exactly is being processed and the specific processing activity that is being carried out, including the purposes, categories of data processed and recipients, among other information;
2. right to **rectification of** any inaccurate personal data;



3. right of **erasure** of your personal data when, among other reasons, it is no longer necessary for the purposes for which it was collected, and provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table included in [section 5](#), is not a legal obligation;
4. right to **object** to the processing of your personal data, provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table included in [section 5](#), is the legitimate interest of Liberty Seguros or a third party. Liberty Seguros will stop processing your data unless a compelling or higher legitimate interest for the processing is proven, or in case they are simply kept blocked for the formulation, exercise or defence of claims;
5. the right to request the **restriction** of the processing of your personal data where the accuracy, lawfulness or necessity of the data processing is in question, in which case we may retain the blocked data for the exercise or defence of claims;
6. the right to **portability** of your data, i.e. to receive your personal data in a structured, commonly used and machine-readable format, in order to transmit them to you or to another data controller, provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table in [section 5](#), is the existence of a contractual relationship or your consent;
7. the right not to be subject to **automated** decisions that may effect on your legal rights, or that significantly affect you and when such decisions are being made;



8. right to revoke the **consent** given to Liberty for the processing of your data, provided that the legitimate basis that enables us to process your data, from among those indicated in the second column of the table included in [section 5](#), is your consent.

You can exercise your rights at any time and free of charge through the form you will find at the following [link](#). For the exercise of data protection rights related to the communication of data to the SIHSA, SIAPTRI and SIPFSRD databases detailed in [section 2](#), you can contact TIREA directly at the address: Ctra. Las Rozas a El Escorial Km 0.3 Las Rozas 28231 MADRID.

In addition, we inform you that, if you wish, you can sign up for the so-called Robinson List, www.listarobinson.es, managed by the Spanish Association of the Digital Economy (ADIGITAL). It is a free advertising exclusion listing, which aims to allow interested parties to oppose receiving advertising in a general way, being able to choose the communication channels through which they do not wish to receive commercial communications. In addition, there is a conflict resolution procedure related to the Robinson List whose access, operation and specifications requirements are defined [here](#).

Furthermore, you have the right to lodge a complaint with Liberty Seguros before the Agencia Española de Protección de Datos if you believe that there has been a breach of data protection legislation in relation to the processing of your personal data.



5. Detailed information on the processing carried out:

5.1 If you have requested a quote, you are insured, a policyholder or you are involved in a claim:

Purpose of the processing	Legal basis	Recipients
<p>Provide support and respond to customer requests received through the different contact channels made available to them (telephone, email, social networks, instant messaging applications and the Customer Portal), as well as manage contracts, payments, quotes, renewals, cancellations, reimbursements and any other service that customers may request, including changes, supplements, green cards or requests for information, among others.</p> <p>To fulfill these purposes, it may be necessary to carry out actuarial calculations to determine the insurance premium, the renewal price and the technical reserves. Actions to defend and clean up the portfolio may also be carried out.</p>	<p>Depending on the specific case: (i) Liberty Seguros' legitimate interest calculating the insurance premium; (ii) Management of the contractual or pre-contractual relationship; (iii) comply with a legal obligation.</p>	<p>Your data may be transferred within the framework of this processing to banks, external auditors, lawyers, brokers, social networks, reinsurers, sectorial associations and managing entities of solvency databases as well as claims information systems of the insurance sector.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, are communications providers, information storage and destruction providers and digital signature.</p>
<p>In the scope of the execution and management of the insurance contract, including renewals, files managed by third parties will be consulted, with credit and solvency information, in order to assess the patrimonial situation as a result of a future periodic payment relationship. This query is made based on the identification data provided by the interested party.</p>	<p>Comply with a legal obligation.</p>	<p>Your data may be transferred within the framework of this processing to brokers and managing entities of solvency databases.</p> <p>The categories of service providers that may have access to your data are those listed in section 2.</p>



<p>Manage customers from the brokers' network, changes in broker position, portfolio transfers and reinsurance, among others, through Liberty Seguros digital channels or instant messaging applications at the request of the broker. Among these purposes is the updating of customer contact data and the classification of the documentation sent and received.</p>	<p>Depending on the specific case: (i) Liberty Seguros' legitimate interest in managing its portfolio of customers and brokers in an efficient and agile way; (ii) Management of the contractual or pre-contractual relationship.</p>	<p>Your data may be transferred within the framework of this processing to brokers and to the parent company of the group to which Liberty Seguros belongs. The categories of service providers that may have access to your data, in addition to those listed in section 2, are communications providers, information storage and destruction providers, processing agencies and digital signature.</p>
<p>To manage tax returns and refunds, as well as possible seizure requests, attempts to recover from private entities, manage indemnities and compensation in the event of a claim, as well as prevent defaults and initiate legal actions in the event of arrears.</p>	<p>Compliance with a legal obligation to which Liberty Seguros is subject.</p>	<p>Your data may be transferred within the framework of this processing to any official body or public authority, other insurance companies, lawyers, collection agencies and to the parent company of the group to which Liberty Seguros belongs. The categories of service providers that may have access to your data, in addition to those listed in section 2, would be communications providers, processing agencies, consultancy and legal advice providers.</p>
<p>Extract, create and manage information to prepare reports, files or databases, with financial, actuarial, claims or other information, as required by the corresponding Authorities. As well as manage the requests from official bodies, coordinate legal actions, trial and pre-trial procedures initiated by (or against) Liberty Seguros.</p>	<p>Compliance with a legal obligation to which Liberty Seguros is subject.</p>	<p>Your data may be transferred within the framework of this processing to any official body or public authority, auditors, lawyers and to the parent company of the group to which Liberty Seguros belongs. The categories of service providers that may have access to your data, in addition to those listed in section 2, would be call recording services.</p>



<p>Marketing campaigns, cross-selling, promotion of Liberty Seguros products and brand, loyalty programs, information on bonuses for referring family and friends, congratulations on special occasions, newsletters or other sponsorships, information on events, sending information on offers and incentives through the elaboration of commercial profiles. These campaigns can be carried out through emails, calls, SMS, search engines, social networks and involve automated processing for monitoring.</p>	<p>Depending on the specific case: (i) Liberty Seguros' legitimate interest in sending commercial communications that may be of the interest of customers; (ii) Consent.</p>	<p>Your personal data will be transferred on the basis of this processing to the parent company of the group to which Liberty Seguros belongs. The categories of service providers that may have access to your data, in addition to those listed in section 2, are communications providers, marketing and incentives sending providers.</p>
<p>Management of Liberty's social networks, the content published on them and the interactions with customers and users.</p>	<p>Liberty's legitimate interest in positioning its image on social networks and interacting with customers and users through them.</p>	<p>Your personal data will be transferred on the basis of this processing through social networks. The categories of service providers that may have access to your information are those listed in section 2.</p>
<p>Service quality surveys and loyalty to Liberty Seguros' products sent via email, SMS or telephone.</p>	<p>Legitimate interest of Liberty Seguros in making strategic and business decisions, as well as improve the services provided, for which the responses to the surveys will be used.</p>	<p>Your personal data will be transferred on the basis of this processing to the parent company of the group to which Liberty Seguros belongs. The categories of service providers that may have access to your information, in addition to those listed in section 2, would be survey service providers.</p>



<p>To develop insurance products, analyse, monitor and plan results and productivity for strategic decision making and to ensure that the procedures and initiatives of Liberty Seguros are aligned with the applicable internal and national regulations and comply with all quality standards. It may include the creation of pricing, risk and demand profiles and models, for statistical and actuarial purposes that make it possible to assess risks, predict fraud, evaluate the evolution of claims, the profile of the customer's suitability for the product and determine the premium for the insurance, as well as geocoding services to calculate the premium and improve predictive models.</p>	<p>Depending on the specific case: (i) Liberty Seguros' legitimate interest in determining the risks and costs associated with contracting a product; in predicting and estimating aspects of their business; in improving its products and processes, carrying out decision-making; and to ensure that all procedures meet the established quality standards; (ii) Management of the contractual relationship; (iii) comply with a legal obligation.</p>	<p>Your data may be communicated within the framework of this processing to reinsurers, external auditors, associations of the insurance sector, insurance regulators and supervisors, to the parent company of the group to which Liberty Seguros belongs and managing entities of solvency databases. The categories of service providers that may have access to your information, in addition to those listed in section 2, would be consultancy and survey providers.</p>
<p>Investigate, detect and prevent fraud, as well as cases of high claim rate, for which information of the interested parties will be consulted in the common databases of the insurance sector and in capital solvency databases, at the time of the conclusion of the contract, during its validity and after its resolution. Likewise, it also seeks to prevent and detect identity and civil status fraud.</p>	<p>Depending on the specific case: (i) Liberty Seguros' legitimate interest avoiding identity fraud of its customers; (ii) comply with a legal obligation.</p>	<p>Your personal data will be disclosed to public authorities, other insurers, lawyers, insurance sector associations, managing entities of solvency databases and common information systems of the insurance sector on the basis of this processing. The categories of service providers that may have access to your data are, in addition to those listed in section 2, are claims investigation providers.</p>



<p>To make back-up copies of systems, maintain the business continuity plan, the security breach management policy, the information access control policy, as well as to control the traffic of information entering/leaving the Insurer's systems. Applications and projects will also be developed, helping to detect possible failures in the systems and solving them. Use analytical tools for security diagnostics and development of infrastructures and applications, including monitoring and alerts on the use of digital channels, as well as their communication to network and information security service providers. Likewise, part of this purpose is to host the data and documentation in the cloud, manage the transfer of information through the technological framework of Liberty Seguros, as well as control the information traffic that enters/exits the Insurer's systems, including the classification, digitization and custody of the company's physical documentation.</p>	<p>Depending on the specific case: (i) Liberty Seguros' legitimate interest in guaranteeing cybersecurity, information security, the performance of applications and the improvement of the services provided, including the fight against fraud; (ii) Fulfilment of a legal obligation.</p>	<p>On the basis of this processing, your personal data will be transferred to entities of the group to which Liberty Seguros belongs, within the framework of a global management of customer data. The categories of service providers that may have access to your data, in addition to those listed in section 2, are communications providers, couriers, information storage and destruction providers.</p>
<p>Deal with claims from any of Liberty Seguros lines of products, including motor, home, commercial, industrial, life and pension funds, among others, whether or not involving bodily injury. Carry out the corresponding evaluation of the damages, the previous investigation about them to make sure that there is no fraud, as well as the management of the network of service providers in the framework of claims and the communication of</p>	<p>Depending on the specific case: (i) Liberty Seguros' legitimate interest to improve customer experience; (ii) Management of the contractual relationship to verify the transactions made; (iii) compliance with a legal obligation.</p>	<p>Your personal data will be disclosed to public authorities, other insurers, reinsurers, brokers, lawyers, to other companies of the group to which Liberty Seguros belongs in the framework of global management of customer data, and to the common information systems of the insurance sector on the basis of this processing. The categories of service providers that may have access to your data are, in addition to those listed in section 2, are claims investigation providers.</p>



<p>data to said providers for this purpose, and the payments of the corresponding indemnities and medical assistance, as the case may be, including to injured third parties. In order to speed the management of these claims, they may be processed through insurance sector conventions. Call recording may be carried out to improve the user experience.</p>		<p>addition to those listed in section 2, would be communications providers, information storage and destruction providers, processing agencies and the common databases of the insurance sector.</p>
<p>Call recording for the purpose of quality control, monitoring the service provided, improving the performance of agents, training agents, improving customer experience, and as a means of proof of the existence and veracity of commercial transactions and queries made. This is based on a telecommunications infrastructure and of electronic and telephone communications that guarantees business continuity.</p>	<p>Depending on the specific case: (i) Liberty Seguros' legitimate interest to improve the quality of service, ensure implementation of its policies and improve the customer experience; (ii) Management of the contractual relationship to verify the transactions made.</p>	<p>Your personal data will be transferred on the basis of this processing to the parent company of the group to which Liberty Seguros belongs. The categories of service providers that may have access to your data, in addition to those listed in section 2, would be call recording services.</p>
<p>Video surveillance and access control at the various Liberty Seguros headquarters to ensure the safety of people and property and the Insurer's premises, as well as for the prosecution of crimes, where appropriate.</p>	<p>Liberty Seguros' legitimate interest in ensuring the security of its facilities.</p>	<p>Your personal data will not be transferred on the basis of this processing. The categories of service providers that could access your data, in addition to those indicated in section 2, would be providers of access control, security and video surveillance services.</p>



<p>To carry out internal and/or external audit processes and ensure the company's regulatory compliance.</p>	<p>Legitimate interest of Liberty Seguros based on legal authorization and to guarantee compliance with internal procedures.</p>	<p>Your data may be communicated within the framework of this processing to any official body or public authority, external auditors, lawyers and to the parent company of the group to which Liberty Seguros belongs. The categories of service providers that may have access to your information, in addition to those listed in section 2, would be consultancy and legal advice services.</p>
<p>To carry out relevant actions and investigations to prevent money laundering and the financing of terrorism. It includes the prevention of transactions with internationally sanctioned parties. Complaints made through the Insurer's ethics line are taken into consideration.</p>	<p>Depending on the specific case: (i) compliance with a legal obligation to which Liberty Seguros is subject; (ii) Legitimate interest of Liberty Seguros in preventing money laundering and the financing of terrorism.</p>	<p>Your data may be transferred within the framework of this processing to the parent company of the group to which Liberty Seguros belongs, as well as to external auditors or public authorities. The categories of service providers that may have access to your data in addition to those indicated in section 2, would be providers of internationally sanctioned databases and providers related to the fight against money laundering.</p>



5.2 If you have filed a claim or exercised a right before Liberty Insurance, the Insurer may process your data for the following purposes:

Purpose of the processing	Legal basis	Recipients
<p>Complaints and queries about the service: to deal with complaints through the corresponding electronic form provided for this purpose, by telephone, by post, by e-mail or through instant messaging applications. In the event you contact us by phone, your call may be recorded.</p>	<p>Depending on the specific case: (i) Legal obligation to attend to customer or interested parties' complaints ; and (ii) Legitimate interest in attending to complaints and queries.</p>	<p>Your personal data will be transferred on the basis of this processing to the official body, ombudsman or public authority involved in the complaint submitted. Access shall be provided to service providers in addition to those indicated in section 2, which shall be providers of customer service, translation and call recording services.</p>
<p>Complaints and queries about the service: to respond to complaints regarding privacy and exercise of rights of access, rectification, erasure, objection, restriction and portability through the corresponding electronic form provided for this purpose, by telephone or email. As well as manage your requests to unsubscribe from commercial communications. In the event you contact us by phone, your call may be recorded.</p>	<p>Legal obligation to attend to complaints regarding privacy or exercise rights of access, rectification, erasure, objection, restriction and portability raised by service providers, customers or any other interested party whose personal data has been processed by Liberty Seguros.</p>	<p>Your personal data will be passed on to the Data Protection Commission on the basis of this processing if the complaint is received by the Data Protection Commission. Access shall be provided to service providers additional to those indicated in section 2, which are providers of call recording services.</p>



5.3 If you have participated in a contest or raffle:

Purpose of the processing	Legal basis	Recipients
Participation in contests and raffles organized by Liberty Seguros.	Consent.	Your personal data will not be transferred on the basis of this processing. Access shall be provided to service providers additional to those indicated in <u>section 2</u> , which are providers of sending communications and messaging.

6. Confidentiality

The personal data that we may collect through our websites, portals, forms, contact mailboxes, as well as through the various electronic or telephone communications that we maintain with you or your representative will be processed confidentially by Liberty Seguros, with Liberty Seguros pledging to keep these secret in accordance with the provisions of applicable law.

7. Update of the Privacy Policy

This Privacy Policy may need to be updated. It is therefore necessary that you review this policy periodically and, if possible, every time you contact us, or access the Liberty Seguros website <https://www.libertyexpatriates.es/security-privacy>, in order to be properly informed about the type of information collected and its processing. You can find the Privacy Policy on the Liberty Seguros website. Notwithstanding the foregoing, we shall notify you of any changes to



this privacy policy that affect the processing of your personal data by means of a notice on the respective Customers' Portal. This Privacy Policy is effective as of December 2022.

