

insurance, compulsory insurance, life and health insurance and other insurance contracts, if necessary.

- 8.4. Upon processing client data, the Broker shall proceed from the European Union and Estonian legal acts, including the General Data Protection Regulation (GDPR) and the Estonian Insurance Activities Act.
- 8.5. Pursuant to sections 181, 217–220 of the Insurance Activities Act, the Broker as an insurance mediator shall process personal data without the person's consent. The Broker shall process personal data based on its justified interest and the brokerage contract
- 8.6. The Broker is obligated to ensure the safety of processing personal data with the purpose of protecting the personal data from accidental or unauthorised processing, disclosure or destruction
- 8.7. The Broker shall ensure that the Clients' personal data will be stored in a way that access thereto is granted to only a limited number of Broker's employees who need access to perform their work assignments and only in the justified and necessary extent.
- 8.8. The Broker shall protect the Clients' personal data by internal security and confidentiality rules and has implemented the organisational, physical and information technology measures (including a secure information system) required to protect the Clients' personal data. Upon processing the Clients' personal data, the Broker uses the least possible amount required to fulfil the objectives set out in the brokerage contract. The Broker's employees are obligated to keep the Clients' personal data confidential.
- 8.9. As a rule, the Broker receives the Clients' personal data only from the Clients (or insurance undertakings). The Broker does not gather the Clients' personal data from third sources, except for public registers and other exceptions set out in this document. Upon extending the insurance contract, the Broker may also receive the Clients' personal data from insurance undertakings (e.g. data concerning insured events and risk circumstances) and its cooperation partners that the Client has authorised to forward personal data to the Broker
- 8.10. In order to process special categories of personal data (e.g. data concerning health status or disability), the Broker needs the Client's separate and appropriately formalised consent.
- 8.11. The Broker has the right to record and store information and data forwarded by the Client via means of communication (e.g. phone, email, website, Skype, etc.), including to record client conversations. The Broker shall use the recorded information to perform the brokerage contract and/or ensure the performance of a brokerage contract, prove expressions of will or executed transactions, and to serve Clients and provide the insurance broker's services.

- 8.12. The Client agrees to forward its personal data to insurance undertakings, if it is necessary to request comparative insurance offers from insurance undertakings, mediate insurance contracts and to provide damage- or insurance-related advice to the Client. Upon forwarding personal data, the Broker demands insurance undertakings to fulfil the security and confidentiality rules based on the contractual rules concerning the processing of personal data.
- 8.13. The Broker shall additionally forward personal data to other authorised processors of personal data (e.g. the provider of auditor and legal service, collection company, experts, etc.) to provide the Clients with the insurance mediation service based on contracts for authorised processing of personal data.
- 8.14. The Broker has the right to forward the Clients' personal data to investigative bodies and the police, the court, bailiffs, the Financial Intelligence Unit, the supervision agency, the tax authority and other institutions specified in legal acts.
- 8.15. The Broker shall process the Clients' personal data within the European Union and the European Economic Community. The Broker shall not forward personal data to third countries. In case it is necessary to mediate the insurance contract, the Broker shall adhere to the confidentiality and security rules set out in legal acts.
- 8.16. The Broker shall store the Clients' personal data as long as is necessary to meet the objectives of processing personal data or fulfil the Broker's obligations set out in legal acts, including considering the expiry dates of claims arising from the insurance and brokerage contracts.
- 8.17. The Broker may process the Clients' personal data also to improve the quality of customer service, measure client satisfaction, develop the services, measure insurance risks, to conduct commercial and statistical analyses, carry out market surveys, make marketing offers, develop the information system and to provide insurance-related services.
- 8.18. The Client agrees to receive commercial offers from the Broker and is aware that the relevant consent can also be withdrawn by notifying the Broker thereof in writing at the contacts specified on the Broker's website.
- 8.19. The Client has the following rights with regard to processing personal data thereof:
- 8.19.1. The Client has the right to ask, at any time, whether the Broker processes their personal data, receive information about what kind of personal data the Broker processes in connection therewith and how are the data used;
 - 8.19.2. The Client has the right to apply the Broker to specify or correct their personal data if these are incomplete, insufficient or incorrect;



- 8.19.3. The Client has the right to apply for the personal data to be erased (for example, if the Client has withdrawn the consent for processing its personal data). In this case, the Broker cannot continue providing services to the Client;
- 8.19.4. The Client has the right to demand the Broker compensation for damages caused thereto by the inappropriate processing of personal data;
- 8.19.5. The Client has the right to receive personal data processed by the Broker in written or generally used electronic form and to demand the Broker to forward their personal data to another processor;
- 8.20. If the Client thinks that their rights have been violated by processing their personal data, a claim or complaint may always be issued with the Estonian Data Protection Inspectorate (Väike-Ameerika 19, 10119 Tallinn, info@aki.ee, www.aki.ee) or the court (www.kohus.ee).
- 8.21. The Client's rights listed herein with regard to processing the personal data thereof do not constitute absolute rights. In some cases, the rights of other data subjects or the Broker's legal obligations may restrict the Client's rights and upon realisation, the Client's rights are balanced with the rights of other persons.
- 8.22. In order to exercise the rights involved with processing the Client's personal data or to submit applications related to processing of personal data, please contact AS Vandeni Kindlustusmaaklerid at contact details listed on the website www.vanden.ee.
- 8.23. The Broker has the right to amend the principles of processing personal data, notifying the Clients thereof 1 (one) month in advance at the Client's contact details or on the website www.vanden.ee.
- 8.24. By submitting an insurance application, the Client gives the Broker the consent to process their personal data in compliance of the provisions of this document.

9. CONCLUSION

- 9.1. To resolve complaints, the Client may contact AS Vandeni Kindlustusmaaklerid at the addresses specified in clause 2.1 of the brokerage terms.
- 9.2. In case the Client thinks the Broker has not fulfilled contractual terms or other requirements, the Client may issue a complaint against AS Vandeni Kindlustusmaaklerid with the consumer complaints committee of the Consumer Protection Board (requirements for the complaint are published on www.tarbijakaitseamet.ee) or the Financial Supervision Authority (www.fi.ee) or the court (www.kohus.ee).

