

## Privacy policy

Confidentiality and protection of your personal data are extremely important for Private Joint Stock Company "INNOVATIV INSURANCE CAPITAL", PSC "INNOVATIV INSURANCE CAPITAL" (hereinafter referred to as «we»). We want your personal information to be securely protected when you use our website and our other services. We require our employees and partners to adhere to the highest standards of personal data handling and protection.

This privacy policy is an integral part of our Terms and Conditions, and the any other agreements entered into with us at the time of your purchase. This privacy policy will also apply if your services have been purchased for you by any third party.

We process your personal data only if there is one of the conditions set out in Article 6 of the General Data Protection Regulation approved by the Regulation of the European Parliament and of the Council of the European Union (EU) 2016/679 (hereinafter – «GDPR»), in particular but not exclusively:

- a) you have given consent to the processing of your personal data;
- b) the processing of personal data is necessary for the provision of the services and/or for the performance of the agreement concluded with you and/or for the provision of additional services, or in order to take steps at your request prior to entering into an agreement;
- (c) the processing is necessary to comply with the obligations imposed on us by the applicable law.

The text of this privacy policy in the Ukrainian language takes precedence over any other language versions. Please read this privacy policy carefully to understand how we process and protect the personal data which you provide to the airline.

### 1. Definitions

In this privacy policy, the terms are used in the following meanings:

Personal data - information or a set of information about an individual who is identified or can be specifically identified

Data Subject - for the purposes of this notice, as a Data Subject and user of website, you will be hereinafter referred to as «you»/«your».

Processing of personal data - any action or set of actions, such as collection, registration, accumulation, storage, adaptation, modification, renewal, use and distribution (transfer), depersonalization, destruction of personal data, including the use information (automated) systems.

Website is a website moderated by PSC "INNOVATIV INSURANCE CAPITAL" and available at <https://travel-insurer.com/>.

### 2. The owner of personal data

Private Joint Stock Company "INNOVATIV INSURANCE CAPITAL", code in EDRUOFOPGF 32942598, the data controller within the meaning of the GDPR. Our location: 03062, Ukraine, Kyiv city, Saksaganskogo street, building 3A(3rdfloor) Email: info@travel-insurer.com, phone +38 044 371 17 17. If you have any concerns or questions about the processing of your data by our company, we request that you contact our Data Protection Off.

### 3. Purposes of personal data processing

We process your personal data in accordance with the GDPR.

We process the personal data to ensure that the provision of the services will be as comfortable as possible and that related issues will be resolved as quickly as possible. The processing of your personal data is performed to the extent which is needed for the justification, implementation and termination of legal relationships.

We may process your personal data for:

- justification of our legal relationship with you (art.6(1)(b) of GDPR);
- providing supporting services e.g. to inform you on any changes regarding service provision (art.6(1)(f) of GDPR);
- fulfilling our legal obligations (providing your personal data to the state authorities in the case prescribed by the relevant legislation) (art.6(1)(c) of GDPR);
- safeguarding of our legitimate interests (art.6(1)(b) of GDPR). Processing for legitimate interests includes direct advertising, combating fraud or the establishment or defense of legal claims;
- establishing, exercising or defending legal claims in accordance with art. 9(2)(f) of GDPR;
- processing operations for health and social care and treatment or for the management of health and social care systems and services in accordance with Art. 9(2)(h) GDPR;
- if for some of our products, it is also necessary to process special categories of your personal data. This takes place on the basis of Art. 9(2)(h) GDPR;
- processing operations for which you have granted consent (art. 6(1)(a) GDPR). On the basis of declarations of consent provided by you separately, we process your data in order to provide you with further information regarding our special offers and offers of our partners, to improve the quality of our services, to give you the opportunity to participate in our programs. Such information may be provided by phone, email or SMS.

We request personal data only to the extent necessary to fulfill the relevant agreement and/or to provide you with a particular service.

You can withdraw your consent to the processing of the personal data at any time without prior notice.

### 3. Personal data which we collect

On our website, we have indicated certain fields as obligatory (name, surname, date of birth, email, phone number, passport number etc). Without their completion, we will not be able to enter into an agreement with you or provide you with other services. The information that is required for entry is collected by us in connection with legal requirements and / or for entering into a relevant agreement with you or for providing you with other services.

The information indicated as obligatory is the personal data which we collect.

### 4. Special categories of personal data

In order to provide you with a certain service, we may need information that is sensitive according to applicable data protection laws. Some of the information provided by you may indirectly provide information about your ethnic origin, your religious beliefs or your state of health.

This data is collected only with your consent - when you select the appropriate services - and is used only to provide certain services. You may refuse to provide consent for the collection of this information. As a result of such refusal, there is a possibility that you will not be able to use these services.

## **5. Processing of personal data of minors**

We are unable to determine the age of website users who provide their personal data. If you believe we have collected personal data about your minor child without the consent of a parent or guardian, you may contact us to remove such information.

## **6. Term for which personal data is collected**

We do not store your personal data longer than necessary. The duration of storage depends on the purposes for which the data is processed.

If necessary, we store your personal data until the expiration of storage periods and deadlines set by applicable law. This shelf life can be up to 10 years.

After the expiration of the period necessary for the storage of your personal data, it shall be deleted and / or destroyed.

When deleting / destroying personal data, we will take reasonable measures to ensure that it is impossible to recover deleted / destroyed data.

## **7. Methods of collecting personal data**

- a) We collect personal data that you provide to us directly through the website;
- b) We collect personal data provided to us by your agent;
- c) We collect personal data provided to us by partner companies or other companies involved in the provision of your services;
- d) We collect personal data from partners who participate in our loyalty programs;
- e) We collect personal data provided by social network providers if you use the relevant social network to log in to the website.

## **8. Transfer of personal data to third parties**

We require all our partners to adhere to strict confidentiality measures and the protection of processed personal data in accordance with this privacy policy and applicable law. The data shall only generally be transferred if there is a contractual or legal requirement where this is necessary to safeguard our overriding legitimate interest, or you have issued your consent to do so. In such cases, your data shall only be transferred to the extent that is absolutely necessary.

If necessary, your personal data may be transferred to the following categories of third parties:

- a) authorized agents and research analysis agencies;
- b) service providers (for example, providers responsible for setting up the website; newsletters, payment service providers, etc.);
- c) our partners (companies with which we have contractual relationship, and such data transfer is necessary for the performance of the relevant agreement);
- d) state bodies.

### *Links to third-party sites*

You may find links to third-party sites on our website. Please note that our Privacy Policy does not apply to the use of third-party websites, we are not responsible for ensuring the privacy of such websites and recommend that you read their privacy policies (or other similar documents).

## 9.1 Transfer of personal data outside of the European Economic Area

### *a. Transferring to the countries with adequate level of protection*

A transfer of personal data to a third country or an international organization may take place where the European Commission has decided that the third country, a territory or one or more specified sectors within that third country, or the international organization in question ensures an adequate level of protection. Such a transfer shall not require any specific authorisation (p.1 Art.45 of the GDPR).

### *b. Transferring to the countries without adequate level of protection*

We may carry out the transfer of personal data by means of cross-border data transfer (in accordance with Art. 49 of the GDPR) to the territory of countries that do not ensure adequate protection of the rights of the subjects of personal data.

In such cases We undertake to transfer personal data only in compliance with the following:

- 1) you provided us with the explicit consent for the cross-border transfer of personal data to third country. Such consent must meet the requirements of the Law of Ukraine "On the Protection of Personal Data" and GDPR;
- 2) you were informed of the possible risks of such transfer due to the absence of an adequacy decision and appropriate safeguards in the meaning of GDPR;
- 3) the purpose of transferring of personal data to other countries is targeted and meets the conditions established in accordance with the relevant legislation;

The personal data may be transferred on the other conditions stipulated by the Art. 49 of the GDPR and the chapter 5 of the GDPR.

As a result of cross-border data transfer, the legislation of the country to which such information was transferred applies to the processing of personal data.

**Notice:** Due to the need to fulfill certain contracts, we may need to transfer your personal data to other countries in which applicable laws do not offer the same level of data privacy and protection (there is the absence of an adequacy decision and appropriate safeguards in the meaning of GDPR). Nevertheless, we take measures to provide an appropriate level of data privacy and protection in case of such transfers.

The Data Subject hereby confirms that he/she understands that in the case of consent with this privacy policy, we may transfer personal data through cross-border transfer of personal data to other countries. By accepting the terms of this privacy policy, the Data Subject provides his/her explicit consent for such transfer and confirms that he/she is familiarized with the possible risks of such transfer if such countries do not provide an adequate level of protection because of absence of an adequacy decision and appropriate safeguards.

## 9. Place of storage of personal data

The databases of processed personal data are placed on servers located in the airline's office at the following addresses: [info@travel-insurer.com](mailto:info@travel-insurer.com).

## 10. Terms of personal data protection

We take appropriate security measures to ensure the protection and confidentiality of your personal data. We have implemented appropriate physical and technical security measures to protect your personal data from unauthorized access, destruction, alteration, damage or disclosure.

### **11. Procedure for access to personal data**

Your personal data is processed by duly authorized employees.

All employees comply with applicable laws and applicable policies regarding access to personal data. Access to personal data occurs only if it is necessary to achieve the relevant objectives and job responsibilities.

### **12. Your rights**

The GDPR, if applicable, provides for the following rights:

- 1) the right of access (Article 15 of the GDPR);
- 2) the right to rectification (Article 16 of the GDPR);
- 3) the right to erasure ("the right to be forgotten") (Article 17 of the GDPR);
- 4) the right to restriction of processing (Article 18 GDPR);
- 5) the right to data portability (Article 20 of the GDPR);
- 6) the right to object (Article 21 of the GDPR).

### **13. Contact information**

If you have additional questions regarding the protection of personal data in connection with the use of the website or the receipt of services, we suggest that you contact our employee responsible for the processing of personal data in the EU and in other countries.

Email address: [info@travel-insurer.com](mailto:info@travel-insurer.com).

### **14. Privacy Policy**

The latest version of this privacy policy is dated 19<sup>th</sup> of July 2022.

We reserve the right to change this privacy policy from time to time. All changes are published on our website. We offer you to regularly read the privacy policy, especially when concluding a relevant agreement or ordering our services.