

**ADDITIONAL INFORMATION ON DATA PROTECTION:****1. Data controller and contact details**

The data controller responsible for the information and/or personal data that you provide to us, including, where appropriate, health-related data, is:

- **Identity:** MAPFRE Asistencia Compañía International de Seguros y Reaseguros, S. A trading as MAWDY is registered in Ireland Number: 903874
- **Postal address:** MAWDY, 22-26 Prospect Hill, Galway, Ireland, H91 TVF8
- **Data Protection Officer email:** [DPO.IRELAND@mawdy.com](mailto:DPO.IRELAND@mawdy.com)

**2. Personal data categories**

The personal data processed by MAWDY are:

- Data collected directly from the Informant.
- Third party data that may be provided by the Reporter through the Internal Reporting System.

The categories of data that will be processed by MAWDY, as applicable, are the following:

- Identification data: full name, email, contact telephone number, and ID card.
- Special Category data: health-related data.

The foregoing is without prejudice to any other categories of data which, by reason of the information contained in the Complaint, may become known to and be processed by MAWDY.

**3. Origin of personal data**

MAWDY will process personal data relating to the data subject from the following sources:

- Data provided directly by the Reporting Person Through the Internal Reporting System (writing or verbally)
- Obtained during the course of the complaint investigation process.

**4. Purposes and legitimizing basis for processing****i. Data processing performed in compliance with legal obligations:**

- Processing, investigating and resolving the Complaints and information received through the Internal Reporting System in order to identify any possible irregularities committed within the scope of the MAFRE Group, as well as managing all data and documentation obtained during the course of the analysis and investigation process, all in compliance with Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of Union law, and the local regulations transposing this Directive applicable to the Entity
- Inform the Affected Persons of the facts attributed to them, once the necessary measures have been taken so as not to compromise the investigation or the confidentiality of the persons involved.

ii. ii. Processing carried out on the basis of the **legitimate interest**:

- In the event of a public disclosure by the data subject, the data will be processed for the purpose of handling the report and carrying out the necessary investigations to clarify the facts related to the report. The public interest pursued by MAWDY is to prevent and detect possible threats, in particular when there is an emergency situation, or a risk of irreversible damage.

iii. Processing carried out on the basis of the **consent**, if any, that you have given:

- Those Reports that are submitted verbally, including those made through face-to-face meetings, telephone or voice systems, will be subject to (i) recording or (ii) complete and accurate transcription, the legal basis being the express and prior consent of the reporting party.

## **5. Storage periods for personal data**

MAWDY will apply the following criteria to determine the period during which the data subject's data will be retained:

- The personal data included in the Complaints communicated through the Internal Information System shall be processed for the time necessary to take a decision on the initiation of an investigation into the facts communicated. In any case, they shall be deleted from said system within a period that shall not exceed the maximum period established in accordance with the applicable regulations.
- Without prejudice to the foregoing, communications addressed to the Internal Information System may be kept duly anonymised for the sole purpose of evidencing its operation

## **6. Recipients of personal data**

MAWDY shall communicate the data of the data subjects for the purposes described in section 4. Purposes and legitimizing basis of the processing exclusively to the following recipients or categories of recipients:

1. MAWDY Internal Information System Committee.
2. Competent areas where the resolution is to be transferred and/or MAWDY, and/or MAPFRE S.A. for the cases in which the MAWDY Information Management Procedure so establishes.
3. Authorities, regulators or governmental bodies where required by law, local regulation or in compliance with regulatory obligations.
4. Notification to the specific company of MAPFRE group in which the events that are the subject of the complaint have occurred in accordance with the conditions governing the management of information systems for corporate groups in accordance with the applicable regulations.

5. Third-party providers that provide services to MAWDY, including but not limited to, the following sectors: document custody and digitization services, administrative management and customer service, advisory and consultancy services, auditing services, and technology providers.

Within the framework of the communications indicated in the preceding paragraph International data transfers may be made to third-party countries. Such transfers will be made only when necessary for the fulfillment of the purposes indicated, applying, in each case, the appropriate guarantee to ensure compliance with data protection regulations.

## **7. Data protection rights**

Under the terms and scope set out in current regulations, the Data Subject may exercise the following rights:

- Access: To confirm if MAWDY is processing personal data concerning you, to have access to such data and to the information related to its processing.
- Rectification: Request the rectification of any incorrect data.
- Erasure: Request that the data be erased when, among other reasons, it is no longer necessary for the purposes for which it was collected.
- Restriction of processing: Request that we stop processing your data, if, for example, the data are inaccurate or the processing thereof is unlawful, however, it may still be processed for the exercise or defense of possible claims, the protection of the rights of another person or for reasons of public interest of the European Union or a Member State.
- Opposition: Oppose the processing of your data, except when necessary for, among other reasons, the development of the contractual relationship, if appropriate, or for the exercise or defense of possible claims.
- Portability: Receive your personal data in a structured, commonly used, and readable format, or request that it be sent to another controller where technically feasible.

We remind you that you may also, at any time, withdraw your consent to the processing of your data.

The aforementioned rights may be exercised directly by the owner of the data or by means of a legal or voluntary representative. You can send your request to the Data Protection Officer, Address: MAWDY, 22-26 Prospect Hill, Galway, H91 TVF8

Email: DPO.IRELAND@mawdy.com

You can also submit a complaint to the Data Protection Commissioner (DPC) the Irish supervisory authority for data protection, [www.dataprotection.ie](http://www.dataprotection.ie), if you consider that MAWDY has not processed your data in accordance with the regulations, through the website set up for such purposes by the corresponding Supervisory Authority.