

LIBERTY ACADEMY DATA PROTECTION POLICY

(Last Update: May 2020)

This Data Protection Policy only covers the collection and processing of your personal data in the context of training (hereinafter the "**Platform**"). Once you access it, you will have access to certain contents relating to the training courses necessary to comply with the mediation regulations, as well as those training courses on Liberty Seguros Compañía de Seguros y Reaseguros, S.A. products necessary for its entire network of mediators to know them in detail (hereinafter, the "**Services**").

Data Controller

In accordance with the provisions of the applicable data protection regulations, we inform you that your personal data as a registered user in the Virtual Office will be processed by Liberty Seguros, Compañía de Seguros y Reaseguros, S.A. with registered address at Paseo de las Doce Estrellas, 4, 28042, Madrid, Spain ("Liberty Seguros"). All communications should be addressed to the branch, with Irish branch number 904632 and branch address at Dublin Road, Cavan. Co. Cavan, Ireland.

You can contact the Data Protection Officer by e-mail to dpo.libertyseguros.es.

Categories and origin of Personal data

Liberty Seguros will collect and process your name, surname and e-mail address to manage your access to the Platform, as well as any other data others that you may provide to us or that are generated in the use of the Platform.

The processing of the data requested during the use of the Platform will be mandatory, unless expressly indicated otherwise. If the data is not provided, it will not be possible to avail of the Services.

Liberty Seguros will collect information related to the use of the Platform, and its functionalities, including the actions you carry out on your account, as well as the time, frequency and duration of your activities.

Purposes and Legitimate basis for the processing of your Personal data

Your personal data will be processed:

- (a) **To Comply with a legal obligation, pursuant from the European Union (Insurance Distribution) Regulations 2018**, regarding insurance distribution:
 - Comply with the obligations relating to the training of Liberty Seguros' insurance intermediaries;
 - Comply with the demands, or communicate to/with, the Central Bank of Ireland, or any other regulatory or supervisory body, relating to the courses done by Liberty Seguros' insurance intermediaries.
- **For The Performance of the Contract Between You and Liberty Seguros** for the following purposes:
 - To educate you in relation to products and services provided by Liberty Seguros;
 - To manage your access to the Platform when the courses are available;
 - To send you information regarding the management of the Platform, including information about the Policies and Terms and Conditions of Use.

Recipients of your Personal data

Your personal data may be communicated to the categories of recipients that are outlined below:

- **To Data Processors for the provision of professional services.** For example, providers of online training platforms, network and information security or providers of cloud computing services.
- **Data Controllers for the compliance with legal obligations.** For example, the Central Bank of Ireland.

International Transfers of your Personal Data

Your personal data may be transferred to the categories of recipients listed in the previous section, some of which are located in countries outside the European Union, including countries that do not provide a level of data protection equivalent to that of the EU. In those cases, we will ensure that appropriate safeguards are in place for that transfer as required by applicable law and, likewise, the guarantees that we indicate below will be implemented:

Recipient Category	Country	Warranty
Liberty Mutual Insurance Company for the centralization of computer processes and applications.	United States	Model contract clauses approved by the European Commission
Data Processors for the provision of network and information security services.	United States	Model contract clauses approved by the European Commission
Data Processors for the provision to Liberty Seguros of cloud computing services.	United States	Contracts/guarantees declared adequate by data protection authorities / Privacy Shield

You can contact the Data Protection Officer to obtain a copy of the indicated guarantees by contacting the following email address DataProtectionOfficer@libertyinsurance.ie.

Your Rights in Relation to Your Personal Data

You have the right to have Liberty Seguros confirm whether or not your personal data is being processed and, where appropriate, to request access to personal data and certain information about the processing of that data (purposes, categories of data processed and recipients, among other aspects). Additionally, you have the right to request the correction of inaccurate data, as well as the erasure of the same when, among other reasons, these are no longer necessary for the purposes for which they were collected. In certain circumstances, you have the right to restrict processing of your data (for example, where you feel the data that we have about you is inaccurate), you can request that the processing of your personal data be limited, unless we have to process that data for a further period for the exercise or defense of a legal claim.

Likewise, you have a right to get a copy of your personal data that you gave us in a structured, commonly used and machine-readable format. You may also ask us to send this personal data to another Data Controller (such as another financial service provider), where technically feasible. Where we do this, we will not be responsible for any action of the other Data Controller in respect of the transferred data.

You may exercise your rights by contacting us at the following email address: DataProtectionOfficer@libertyinsurance.ie.

If you want further information about the way your personal data will be used or if you are unhappy with the manner, we have handled your personal data, you should contact our Data Protection Officer. You also have the right to lodge a complaint with the Data Protection Commissioner. Their contact details are as follows:

(a) Data Protection Commissioner (if you are in the Republic of Ireland)

21 Fitzwilliam Square South, Dublin 2, D02 RD28.

Tel: +353 (0)761 104 800. Tel: +353 578 684 800.

Email: dpo@dataprotection.ie

Web: www.dataprotection.ie

Alternatively, you have the right to lodge a complaint with our lead supervisory authority in Spain for cross- border processing activities. Their contact details are as follows:

(b) Spanish Data Protection Agency (AEPD)

C/ Jorge Juan, 6, 28001 Madrid, Spain

Tel: 00 34 901 100 099

Web: <https://sedeagpd.gob.es/sede-electronica-web/>

Retention of your Personal Data

We will keep your personal data for as long as reasonably necessary to fulfil the purposes and to comply with our legal and regulatory obligations. This will involve retaining some of your personal data after your relationship with us has ended, during the statute of limitation of the relevant legal actions.

* LIBERTY SEGUROS, Compañía de Seguros y Reaseguros, S.A. Registered Office: Paseo de las Doce Estrellas, 4, 28042. CIF: A-48037642.