

# PRIVACY POLICY

With this Privacy Policy, **Assegurances Ivori, S.A.** (hereinafter, we or **ASSIVORI, S.A.**) inform you of the personal data we collect through the services we offer. In this policy that you can find on our website, we inform you of how we process them and of the rights that the Personal Data Protection regulations that apply to us confer on you in relation to your personal data and our treatments.

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## Applicable regulations

1. Qualified law 29/2021, of October 28, for the Protection of Personal Data of the Principality of Andorra (hereinafter, “the **LQPD**”), and the regulations that develop it.

In the following table you will find links to facilitate access to the points of this policy that are of interest to you, however, please read all the sections of this privacy policy before using this website:

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## 1. To whom does this Privacy Policy apply?

This Policy applies to people who relate to ASSIVORI, S.A. through this website, to the users of the services that ASSIVORI, S.A. offers for the purposes described in section 4 of this policy (the **Services**), and to all people whose personal data (for example, their images) may appear on our Website or in the context of the Services.

## 2. Who is responsible for the processing of your personal data?

The sole controller for the processing of your personal data in accordance with what is indicated in this policy is:

**Assegurances Ivori, S.A.** (ASSIVORI, S.A.), with NRT A-706616-M and registered office at Carrer Prat de la Creu, no. 96, 2nd-3rd – AD500 Andorra la Vella (Principality of Andorra).

We have a Data Protection Officer –[Win2win, SLU](#), an Andorran company specialized in privacy and personal data protection– whom you can contact via the email [DPDextern@win2win.ad](mailto:DPDextern@win2win.ad).

ASSIVORI, S.A. is not responsible for the activities carried out by other websites, even if you access them through links on our website. That is why we strongly recommend that you carefully read the information provided by these other responsible parties before giving them your personal data (especially the privacy and cookie policies of each website you visit), and that you communicate with this manager if you have any concerns or questions.

## 3. How do we obtain your personal data?

In general, you are the one who directly provides us with your personal data. The only exceptions to this rule are:

- Data provided to us by third parties who request our services on your behalf (as a beneficiary);
- Contact details provided to us by our providers when you represent them;
- The personal data about you that may appear in the emails and instant messaging we process; and
- The two cookies of this website, about which you will find more information in section 4 of this policy.

#### 4. What do we use your data for and on what legal basis do we do it?

##### To start the relationship with our customers

We collect the data you provide us in our offices, by telephone or by email to prepare the product proposal that better suits what you ask us, and if you accept that proposal, to prepare the corresponding contract.

Sometimes, we collect more information about our customers or potential customers and/or their beneficiaries for the following purposes:

- We carry out a due diligence with the aim of better managing the capital contributed to your ASSIVORI, S.A. life/savings policy, and adapting them to your investment and risk profile; and
- We fill out KYC (Know Your Customer) forms aimed to prevent natural or legal persons from using legitimate services to participate in illegal activities.

Finally, we would like to inform you that we do not make any automated decisions based on your investment and risk profile.

The legal basis that legitimizes the processing for the management of the insurance proposal is the consent you express by giving us the data we need to prepare it.

The legal basis that legitimizes the processing associated with the provision of services is that it is necessary for the execution of the contract that regulates the terms and conditions of use of these services.

Finally, the legal basis that legitimizes the processing associated with KYC management is our legal obligation in accordance with Law 14/2017, of June 22, on the prevention and fight against money or securities laundering and the financing of terrorism.

##### To maintain the relationship with our customers

We collect your data, which we receive orally or in writing directly from you or from a third party that represents you or of which you are a beneficiary, when you contract an insurance, to manage said contract and provide you with the corresponding service.

Additionally, we inform you that, as a result of this contractual relationship, we may communicate orally or in writing information related to the products or services you have contracted us.

The processing of this data is legitimated because it is necessary for the execution of the services or products contract in which you are an interested party, and for our legitimate interest in keeping you informed in relation to the products or services purchased.

### To initiate and maintain the relationship with our suppliers

If you represent a supplier of products or services, we collect your contact details and your signature to:

- a) Manage our relationships of all kinds with the supplier you represent.
- b) Manage the inclusion of the supplier in our list of authorized suppliers.
- c) Manage the budgets and invoices of the supplier you represent.

The processing activities linked to purposes a) and b) are legitimized by the employment or the service contract you have signed with the supplier you represent, and our legitimate interest in contacting them. And the processing activities linked to purpose c) are legitimized for being necessary for the execution of the contract you have signed with us.

### To select and hire our staff

We process the CV data that you voluntarily send us, together with the data that appears in your profile on strictly-professional social networks, as is the case of LinkedIn, and the data that we can collect during the interviews and tests that you voluntarily agree to carry out, to manage the relationship with you regarding your application for a job in ASSIVORI, S.A., including the process of searching, filtering and storing the CV as a potential candidate, the staff selection process and the recruitment process.

The legal basis for the aforementioned processing activities is your consent, which you express when you send us your CV, fill-in a test or attend an interview, and the fact that they are necessary for the execution of pre-contractual measures, if you request them, and if we do not have an open selection process or you are not hired and we consider that you may fit into future selection processes, our legitimate interest in retaining your CV for the purpose of including it in such future selection processes. The legal basis that legitimates us to consult your profile on strictly-professional social networks, such as LinkedIn, is our legitimate interest in enriching the professional information of candidates in order to reduce the time that both you and us will take in the selection process. You can withdraw your consent or object to our legitimate interest as set out in section 7 of this policy, and doing so will have no effect other than the destruction of your CV (if you withdraw your consent) or the limitation of its conservation to the selection process for which you have sent us your CV.

### To attend to your requests, inquiries or complaints

We collect the personal data you provide us in your emails, by phone, or through the requests to exercise your rights, to attend to your requests, inquiries or complaints in relation to our services or the rights you have over your personal data.

The legal basis for this processing activities is the consent you express when sending or giving us these data, our legal obligation to attend to your rights requests, and our legitimate interest in attending to you. The supply of your personal data is therefore

voluntary, although if you do not provide them, we will not be able to process your request, query or claim. You can revoke your consent whenever you wish, although such revocation will also make it impossible to continue processing your request, inquiry or claim.

**To manage any future claims**

We retain the data that may be necessary to manage your possible claims, or ours, on the basis of our legitimate interest to defend ourselves to safeguard our rights.

**To guarantee the operation of our website (functional cookies)**

Our website uses the following two functional cookies that you can manage or disable as indicated in section 8 of this policy.

Technical Cookie	Supplier	Purpose	Duration
PHPSESSID	assivori.com	To maintain the consistency of the functions we offer you even when you have pages of our website open in different tabs of your browser.	Session
Cookie of preferences	Supplier	Purpose	Duration
pll_language	assivori.com	To remember the language in which you wish to view our website	1 year

The legal basis that legitimizes us to use these two cookies is our legitimate interest in offering you a fully functional website that suits your language preferences.

The article 29 working party (former WP29 and current European Data Protection Board) in its Opinion 4/2012, "[on the exemption from the consent requirement of cookies](#)", considers that these type of cookies do not pose a risk for you and are exempt from the obligation to obtain your consent prior to the use to all cookies that:

- are necessary for communications to be transmitted through a network between the user and the servers that host the website, and to all those that
- are necessary to provide a specific functionality explicitly requested by the user, such as, for example, remembering the language in which you wish to view our website.

This exemption from the obligation to base the legality of its use on your consent, so as not to represent a risk for you, is also reflected in the cookie guides published by most of the Data Protection Agencies of the EU countries (for example, in the case of Spanish, it is included in section 4.1 of the [guide on the use of cookies](#), of July 2020).

The fact that there is no need to collect prior consent also makes the typical cookie banner, and a more widespread cookie policy, unnecessary.

#### To notify you of security breaches

In ASSIVORI, S.A. we take security measures appropriate to the level of risk to protect personal information against loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the personal information; however, if we determine that your data has been misappropriated (even by an employee or ex-employee of ASSIVORI, S.A.), has been exposed through a security breach or has been improperly acquired by a third party, exposing you to a high risk, we will immediately inform you about this security breach, misappropriation or acquisition, and about the measures we have taken and those we recommend you take so that the breach does not affect you.

The basis that legitimizes this treatment is the legal obligation set out in article 37 of the LQPD, and our legitimate interest in preventing this security breach from harming you.

#### For other purposes that are not incompatible with the above

We may use your personal data for other purposes that are not incompatible with those indicated above (such as archival purposes for reasons of public interest, scientific or historical research purposes, or statistical purposes), whenever permitted by current personal data protection laws, and of course, acting in accordance with those and with the rest of the applicable regulations.

### 5. Who can we share your personal data with?

We do not give your personal data to anyone, unless:

- You request it.
- We have a legal obligation to do so.
- You contract our products including third parties so that they represent you legally through powers conferred always with your consent or that designate you as a beneficiary,
- A company subcontracted by us needs to process them on our behalf (for example, payment processing or external Data Protection Delegate services, who will have to attend to your questions and requests for rights in this matter), under the terms and conditions of the corresponding data processor contract.
- A company outsourced by us may occasionally have access to personal data on our systems, even if they do not need to process it on our behalf. This is the case, for example, with some of the services of our IT service providers. Given that they could access data from ASSIVORI, S.A., they have signed a processor contract that obliges them to maintain the same level of privacy that we have at ASSIVORI, S.A..

Any transfer that we eventually need to carry out will comply with what is established by the regulations in force that apply to us at any given time.

## 6. How long do we keep your personal data?

ASSIVORI, S.A. keep your personal data exclusively for the duration of the processing activities that require them and, then, for as long as it takes to prescribe the legal responsibilities that could apply to us at any time, derived from the processing in question (including the obligation to be able to demonstrate that we have attended to your request for the deletion of personal data).

For example:

- In accordance with article 15 of Law 37/2021, of December 16, amending Law 14/2017, of June 22, on the prevention and fight against money or securities laundering and the financing of terrorism, we will keep for a period of five years (calculated from the end of our relationship, or if it is an occasional operation, from the date of this), all the documentation, data and information that we were obliged to require in accordance with this law, as well as the receipts and records of transactions and operations, account information and commercial correspondence, and the results of all analyzes carried out, including, where appropriate, information obtained by means of relevant electronic identification in accordance with the current Electronic Certification and Trust Law.

We will destroy your CV when it is more than five years old, as we consider that it is outdated in relation to the purpose for which it would have been dedicated.

We will destroy any unnecessary or disproportionate personal data about you that may appear in emails and instant messages we receive as soon as we receive it.

We will destroy (and rectify) any personal data that we find to be inaccurate as soon as we verify its inaccuracy.

When we do not have a legitimate purpose for processing some of your personal data, we will delete or anonymize them, and if this is not possible (for example, because the data is stored in backup copies), we will store the personal data securely and block them to isolate them from any further processing until their removal is possible.

## 7. What rights do you have?

You have the right to obtain confirmation as to whether or not we have any of your personal data.

Below, we explain what other rights you have and how to exercise them.



## Your rights

You can request us to enforce the following rights:

- [Access to your personal data](#).
- [Rectification of some of your personal data](#), specifying the reason.
- [Deletion of some or all of your personal data](#).
- [Limitation of the processing of your data](#), specifying the reason for the limitation.
- [Opposition to the processing of your personal data](#).
- [Portability of your data](#) when the legitimate basis for collection has been consent or a contract.
- [Right not to be subject to automated individual decisions](#).

The consent given, both for the processing and for the transfer of the data of the data subjects, can be revoked at any time by communicating it to us, just like any other right, as indicated in the following section. This revocation will in no case be retroactive.

## Where and how you can exercise your rights

You can exercise your rights:

1. By sending a written request to ASSIVORI, S.A., addressed to our postal address, indicated in section 2 of this policy, indicating a means of contact with you to be able to respond to your request, or ask you for more information if necessary. We would appreciate it if you marked the envelope with the text "Exercise of Personal Data Protection Rights".
2. By sending an email or the form associated with the right you wish to exercise to the address [DPDextern@win2win.ad](mailto:DPDextern@win2win.ad), indicating in the subject "Exercise of Personal Data Protection Rights". You will find these forms later, in this same section of the privacy policy.

In both cases, if it is not possible for us to verify that you are who you say you are, we will ask you to kindly send us a proof of your identity, and in this way ensure that we only respond to the data subject or his/her legal representative.

If the person sending the mail does so in the capacity of representative of the data subject, the representative's accreditation must be done through documents or legal instruments that correctly identify the data subject and the representative and specify the order or procedure for the which representation is delegated.

Finally, and especially if you consider that you have not obtained full satisfaction from the attention to the exercise of your rights, we inform you that you can submit a claim to the national control authority, by contacting the Agency Andorran Data Protection Authority ([APDA](#)).



## Forms for exercising your rights

In order to facilitate the exercise of your rights, we recommend that you use the corresponding application forms from the following:

- [Form for exercising the right of access](#)
- [Form for exercising the right of rectification](#)
- [Form for exercising the right of deletion](#)
- Form for exercising the right of opposition ([model A](#) and [model B](#))
- [Form for exercising the right to limit treatment](#)
- [Form for exercising the right to portability](#)
- [Form for exercising the right not to be subject to automated individual decisions](#)

## 8. How can I manage or disable cookies?

You can administer, manage and deactivate the cookies used by our website at any time from your browser, for example, to withdraw your consent, following the instructions provided by the manufacturer of your browser:

- [Instructions for Microsoft Edge](#)
- [Instructions for Google Chrome](#)
- [Instructions for Google Android](#)
- [Instructions for Internet Explorer 11](#)
- [Instructions for Mozilla Firefox](#)
- [Instructions for Opera](#)
- [Instructions for Safari](#)

If you disable the installation of cookies in your browser, you will be able to continue accessing our website with it, but your navigation may not be optimal and some of the services offered may not work properly.

## 9. What responsibilities do you have?

By providing us with your data, you guarantee that it is accurate and complete. Likewise, you confirm to us that you are responsible for the veracity of the personal data you have communicated to us and that you will keep them conveniently updated so that they respond to your real situation, making yourself responsible for false or inaccurate personal data that you may provide us, as well as damages, direct or indirect, that could derive from your inaccuracy.

You cannot provide us with personal data of other people unless it is justified in relation to the services you request from us. In any case, if you provide us with the personal data of third parties, you assume the responsibility of informing said third parties prior to providing us with their personal data. This information that you must provide to the third parties whose data you supply to us, must include all the provisions provided for in this privacy policy, and it is you who is responsible for the lawfulness of this personal

data and for transmitting to its holders the rights they have in relation to their personal data.

In the cases in which you have to provide us with personal data of a data subject under 16 years of age or of a person whose rights are limited, in doing so you are obliged to have the authorization of the holders of their parental authority or tutelage. Without this authorization, it is forbidden to provide us with any personal data of these people.

#### 10. How do we protect your personal data?

We are fully committed to the protection of your privacy and your personal data. We have drawn up the record of all the personal data processing activities that we carry out, we have analyzed the risk that each of these activities may pose to you, and we have implemented the appropriate legal, technical and organizational safeguards to avoid, as far as possible, the alteration of your personal data, its misuse, loss, theft, unauthorized access, or unauthorized treatment. We conveniently keep our policies up to date to ensure that we provide you with all the information we have about the processing of your personal data, and to ensure that our staff receive appropriate guidance on how they should handle your personal data. We have signed data protection clauses and data processor contracts with all our service providers, taking into account the need that each of them has to process personal data.

We restrict access to personal data to those employees who really need to know it to carry out any of the treatments referred to in this policy, and we have trained them and made them aware of the importance of maintaining confidentiality, the integrity and the availability of information, as well as on the disciplinary measures that would involve any eventual infringement in this matter.

However, if ASSIVORI, S.A. determines that your data have been misused (even by an employee of ASSIVORI, S.A.), have been exposed through a security breach, or have been improperly acquired by a third party, ASSIVORI, S.A. will notify you immediately of such security breach, misappropriation or acquisition.

#### 11. Changes to this Privacy Policy

We will update this policy when necessary to reflect any changes to regulations or in our processing activities. If the changes are substantial, we will notify you before they become effective by sending you a notification or by posting a prominent notice on our website, and you will have the option to exercise your rights as we informed you in a previous section. In any case, we recommend that you periodically review this privacy policy to learn how we protect your personal data.

If you have any questions about this policy, please do not hesitate to let us know by emailing us at [DPDextern@win2win.ad](mailto:DPDextern@win2win.ad).

**Last updated: November 26, 2022**