

COMMITMENTS MADE BY UNIPOL GROUP  
FOR THE PROTECTION AND ENHANCEMENT  
OF PERSONAL DATA  
("UNIPOL DATA VISION")

2 april 2020

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## 1 Introduction

This document, which is an integral part of the Personal Data Protection and Enhancement Policy (the “**Policy**”), defines the commitments made by the Unipol Group for the protection and enhancement of personal data with respect to its customers and all stakeholders.

The attention that Unipol Group dedicates to the protection and enhancement of personal data in running its business guarantees respect for the values of Unipol Group contained in the Charter of Values and the Code of Ethics, demonstrating its accountability in the decision-making process and the dialogue with its stakeholders.

## 2 Scope of application

This attachment applies to the Parent Company and to the Group companies it controls with registered office in Italy (the “**Companies in scope**”).

With reference to the Group companies with registered office in another country of the European Union, without prejudice to the fact that they have their own policies on the protection of personal data consistent with the Policy, the commitments made by Unipol Group to protect and enhance personal data will be shared as part of coordination efforts between Unipol Group DPO and the DPOs appointed at local level. This is so that the DPOs of the Group companies with registered office in another country of the European Union can evaluate the methods for incorporating the above-mentioned commitments within their respective policies.

## 3 Unipol Data Vision

Increasingly often, we speak of data relating to natural persons, and particularly those connected to their behaviours, choices, movements and preferences, as a point of departure for the creation and development of products, services and innovative solutions that respond to the actual preferences of end users. Therefore, great opportunities for social and economic development are linked to the availability of personal data and their use by those in possession of them.

To fully realise these opportunities, it is necessary to build a transparent and balanced relationship between the parties to whom the data refer and those who are using such data. It is specifically necessary for the Data Subjects to always be aware of the purposes for which their data have been collected and how they are processed and used, to always be certain that their data are adequately protected and to always be able to exercise the rights recognised to them by regulations on the protection of personal data. Thus, it is necessary that the value created through the analysis and processing of personal data be shared, that is, that the parties to whom the data refer can also benefit from it, directly or as part of the collectivity.

Within Unipol Group, for example, the use of personal data by an insurance company is necessary to be able to play its social role, by underwriting risks as knowledgeably as possible, so it can define adequate tariffs capable of making claim management sustainable. The increasing quantity of data that companies can collect and analyse can boost the capacity of insurance companies to protect their customers from risks in an accessible manner.

In Unipol Group, considering the different businesses run by the Companies in scope (for example, insurance, long-term rental, hospitality), a wide range of personal data are held, which relate to various moments in the life of natural persons, their behaviours, their available resources, their health, habits and preferences. This aspect will have increasing impacts with the growing spread of new connected devices (such as black boxes

in vehicles, online services in homes). Information collected by new connected devices are particularly valuable and must be processed carefully, not only to ensure the protection of the natural persons to whom such data refer, but also to share the value that can be generated from their management using advanced methods, for example, with reference to the insurance business, by improving the prevention of risks linked to health/illness, safe driving, house burglary and leaving minors unattended in parked vehicles.

#### **4 The five commitments made by Unipol Group for the protection and enhancement of personal data**

With a view to increasingly implementing the system for protecting and enhancing personal data that Unipol Group has developed, while acting in a transparent manner with customers and with all stakeholders so as to strengthen their trust in the Group, five commitments have been identified which the Group has made and intends to move forward with in this area.

In particular:

- Respect: Unipol Group undertakes to perform data collection, analysis and processing activities with full respect for the values guiding its actions, as expressed in its Charter of Values and Code of Ethics;
- Protection: Unipol Group protects the personal data held: this represents the first pillar for guaranteeing the rights of customers and all stakeholders with which the Group enters into contact. In line with what is set forth in the Group Sustainability Policy, due to the increasing role played by information technology in business activities and processes, which concerns relations with stakeholders, particularly with regard to employees and customers, and the resulting exchange of data and information, Unipol Group is committed to paying constant attention to guaranteeing a responsible approach to data management. This approach is developed over time consistent with regulatory, cultural and technological changes and is oriented towards the adoption of advanced protection systems while promoting awareness amongst stakeholders concerning how and for what purposes their personal data are processed. Unipol Group will continue to invest resources to keep update and strengthen the data security protection system;
- Information: Unipol Group companies transparently inform their customers about the use of the personal data collected, enabling them to understand the impacts of their decision to share data.
- Understanding: the development of solutions based on personal data and their processing - such as Artificial Intelligence (AI) systems - aims to identify innovative approaches to improve products and processes. Unipol Group undertakes, even when developing technological solutions, to always put human beings and their needs at the centre; their understanding is fundamental for those who develop these solutions, in order to create inclusive and non-discriminatory systems;
- Value creation: Unipol Group believes that use of personal data represents a significant area for shared value creation. In particular, looking for example at the insurance sector, as the Group's predominant business, it is believed that the use of data can boost value for:
  - customers, who thanks to the use of data can benefit from a better understanding on the part of the Group companies of their actual protection needs and solutions that provide targeted, concrete responses to those needs; through data, it is also possible to develop tools, services and processes intended to prevent and reduce risks;
  - Unipol Group, due to the fact that the collection and use of data allow for increased knowledge of risks, which leads to more knowledgeable underwriting and thus greater overall sustainability; furthermore, through data, insurance companies are capable of developing more effective

- products and services to protect their customers and offer them greater opportunities;
- the community, due to the fact that the availability of data for Unipol Group and the technological skills developed support the development of solutions that pool the contributions of multiple players, particularly through public-private partnerships<sup>1</sup>, to meet the needs of the community.

## 5 Personal data enhancement Task Force

Notwithstanding the provisions on the protection of personal data adopted by the Group in its Personal Data Protection and Enhancement Policy, as well as what is set forth in the Group Policy on Data Governance and the Information Security Policy, Unipol Group has defined its commitments on responsible data management in the Group Sustainability Policy, which defines the duties of the Board of Directors and the Board Committees regarding the identification, assessment and management of the main risks connected to topics with an environmental, social and governance impact, deemed “material” for the Group and its reference stakeholders (so called “ESG” factors and the relative risks).

In this context, and in line with the objective of enhancing personal data, a Task Force (“Data Ethics Task Force”) has been established at Group level, which is responsible for: (i) understanding and evaluating the impact on stakeholders of the enhancement of personal data underlying projects launched or to be launched, or business activities, ensuring that the opportunities and impacts are proportionate with a view to respecting the values of the Unipol Group set forth in the Charter of Values and the Code of Ethics (ii) taking decisions consistent, on a case by case basis, with the company’s vision and with the Group’s values referred to above.

The Task Force meets at least once per year and consists of departments/functions of Unipol Group/UnipolSai that play a key role for the understanding and management of those impacts: Chief Innovation Officer, Chief Telematics and Insurance Services Officer, IT Services Division, Marketing and Sales Communication Division and the Sustainability Function. The Legal Department, the Compliance and Anti-Money Laundering Function, the Ethics Officer and the Group Data Protection Officer also play an advisory role on the Task Force. The Group Data Protection Officer is called upon to express an opinion on specific queries raised by the Task Force as well as regarding personal data protection matters, without prejudice to the activities he or she performs with reference to new processing or changes to existing processing, in line with the provisions of the Personal Data Protection and Enhancement Policy.

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<sup>1</sup> For example, the public-private partnerships launched for the improvement of sustainable mobility in cities, for homecare and for the adoption of adequate tools to assess, prevent and manage risks linked to catastrophic events.