



DATA PROTECTION

Privacy Notice

GrECo Academy

Effective July 12th 2022

www.greco.services

GrECo,
matter of trust.



1 General information

Thank you for your interest in our website and our company.

Our website may include links to other websites, which are provided purely for the purpose of information. We check external links carefully. However, we are not responsible for the content or security of these external links.

We protect the personal data you provide when visiting our website, and maintain your data privacy in our data processing, in accordance with the legal requirements. For further details on our data handling and protection policies, please read on.

1.1 The Controller for the processing of your personal data is

GrECo Academy for the Increase of Knowledge as well as for Education and Training in the field of Insurance (*GrECo Academy zur Wissensvermehrung sowie zur Aus- und Weiterbildung auf dem Gebiet des Versicherungswesens*)

Elmargasse 2-4

1190 Vienna

Website: <https://www.greco.academy>

E-mail: acaedemy@greco.services

Enquiries concerning data protection should be sent directly to the email address or postal address above.

1.2 Supervisory authority

Austrian Data Protection Authority (*Österreichische Datenschutzbehörde*)

Website: <https://www.dsb.gv.at/>

2 Scope and purposes of data processing

2.1 Which of your personal we process and for what purpose

When you visit our website, you have the opportunity to contact us by subscribing to our newsletter or by filling out our contact form. We will process only the personal data you decide to share with us via these forms for the purpose of handling your particular request, in particular your name, your contact details (email address) as well as the contents of your query. See sections 2.2 and 2.3 below for further details.

No cookies are used on our website.

2.2 Newsletter

On our website you can subscribe to our newsletter. You can also unsubscribe, by activating the “unsubscribe” link at the end of each newsletter, or contact us directly by replying to the newsletter.

This aspect of data processing is regulated by the legal provisions in sections 96 (3) and 107 of the Austrian Telecommunications Act (*Telekommunikationsgesetz, TKG*) and Art. 6(1)(a) GDPR (Consent).



2.3 Contact form

The information you provide in our contact form, including personal data, is transmitted to our own mail server, processed and saved by us so that we can respond to your enquiry. These data are not collected or forwarded without your consent. Without these data we cannot respond to your enquiry.

By using our contact form you confirm that you are not a child, i.e. in Austria, that you are over 14 years old, or that your legal guardian has given consent.

This aspect of data processing is regulated by the legal provisions in sections 96 (3) and 107 of the Austrian Telecommunications Act (*Telekommunikationsgesetz, TKG*) and Art. 6(1)(a) GDPR (Consent).

2.4 Children's data

We do not enter into contracts with minors, and are not permitted to do so. When you accept an online contract or online services etc, you confirm that you are not a child, i.e. in Austria, that you are over 14 years old, or that your legal guardian has given consent.

3 Transfer and retention of your personal data

3.1 Is your personal data shared, and if so, with whom?

The security of your personal data is important to us. For that reason, your data are only shared when there is a contractual or legal requirement to do so, or where this is necessary for the protection of our legitimate interests, or with your consent. Your personal data may be shared with:

- companies within the GrECo Group, their employees and agents, to the extent that this is necessary for the fulfilment of contractual, legal or regulatory obligations, and for the protection of legitimate interests, particularly the provision of IT services (e.g. from GrECo International Holding AG in Austria as the central IT service provider for all GrECo companies) or back office services, to the extent required for the fulfilment of our responsibilities or otherwise for the provision of our services
- *Microsoft Ireland Operations Limited* in its capacity as a data processor (including its sub-processors) through the use of cloud services provided within the EU
- Providers of IT infrastructure, IT security and/or network services
- public bodies and institutions, where we are legally required to do so
- third parties acting on our instruction, e.g. lawyers; third parties are contractually obliged to keep your data confidential and only to process them as necessary for the provision of service.

3.2 Are my personal data transmitted to third countries?

Depending on the circumstances of the particular case, your data may be shared with GrECo companies located in third countries which are contractually obliged to uphold the standards of data protection and security as defined in the GDPR. This is also monitored, e.g. in Austria by GrECo International Holding AG, the central IT service provider of the GrECo Group. GrECo International Holding AG, as central IT service provider (computing centre), also processes data on behalf of GrECo companies in third countries.

We do not generally use data processors outside the GrECo Group which are located in third countries. Where the data processors we have engaged use the services of sub-processors located outside the EU, we ensure that these



sub-processors are obliged to comply with the data protection and security standards of the GDPR so that they provide appropriate safeguards for the protection of your personal data.

3.3 How long is your personal data retained?

We will process or store your personal data for the duration required to fulfil the processing purposes described above, to comply with applicable data retention obligations and/or to protect our legitimate interests.

After the end of our relationship with you, the data retention period depends on our statutory record keeping obligations and the duration of statutes of limitations on claims which may be raised between us. For instance, according to record keeping obligations under corporate and tax law, we are obliged to keep our business records for a minimum of seven (7) years. Examples of very common record keeping obligations under Austrian law can be found here (available in German only):

<https://www.wko.at/service/wirtschaftsrecht-gewerberecht/eu-dsgvo-speicher-und-aufbewahrungsfristen.html>

If we are not already obliged to retain your data as a result of our statutory record keeping obligations, we may still retain your data while the statute of limitations on claims which may possibly be raised between us have not yet expired. Such claims could be made for the performance or reversal of a contract, compensation for damages, or the fulfilment of other legal obligations. For instance, in most cases, the statute of limitations under Austrian law on claims for compensation of damages expires after three (3) years. In some cases, however, statutes of limitations do not expire for thirty (30) years.

4 Your rights

You have the right of access, rectification or erasure or to restrict the processing of your saved data, the right to object to processing and the right to data portability, at any time, subject to the conditions of the data protection laws. Please direct any enquiries on these matters to the Controller for the processing of your personal data, as defined in item 1.1.

To ensure that your data do not fall into the wrong hands, and that no-one can erase your data against your wishes, it is essential that we check your identity every time you contact us.

Any complaints may be submitted to the regulatory authority identified above in section 1.2 or, if different, the supervisory authority in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

You have the following specific rights:

4.1 Right of access

According to Art 15 GDPR, Controllers must provide any data subject with access to personal data concerning themselves which is being processed.

4.2 Rectification and erasure

According to Art 16 and Art. 17 GDPR, you as a data subject have the right to demand the rectification and erasure of personal data concerning yourself.



4.3 Restriction of processing

According to Art 18 GDPR, you have the right to restrict the processing of personal data concerning yourself.

4.4 Data portability

According to Art 20 GDPR you have the right to data portability. This is the right, under the conditions specified, to obtain personal data you have provided, in a structured, commonly used and machine readable format, and to require that these data be transmitted to a third party.

4.5 Right to object

According to Art 21 (1) GDPR every data subject has the right, for reasons arising from their particular situation, to object to the processing of personal data concerning themselves which are processed, amongst other things, for pursuing the legitimate interests of the Controller or a third party. This also applies to data processed for profiling based on this provision. You can object at any time to the processing of your personal data for the purpose of direct marketing (e.g. for a spotlight or newsletter), to be effective for the future.

5 Modification of this policy declaration

This policy declaration replaces all earlier versions. We reserve the right to modify this policy as necessary if circumstances change. The current version of this data protection policy is available at any time on our website at <https://grecoacademy.com/>.



GrECo,
matter of trust.

GrECo Academy

for the Increase of Knowledge as well as for Education and Training in the field of Insurance

Elmargasse 2-4 | A - 1190 Wien

academy@greco.services

Austrian Central Register of Associations, no. 1356172648

www.greco.academy

All rights for this presentation are reserved. The content of this document including its sections (all or in part) is protected under copyright. The information contained in it is confidential. This document and its content may not be used, translated, distributed, copied or processed by electronic means without the expressed agreement of the GrECo Group. Distribution to a third party is not permitted.