



DATA PROCESSING POLICY WITHIN THE FRAMEWORK OF RNA'S RELATIONSHIP WITH THIRD PARTIES

**Policyholders, Insured Parties, Beneficiaries, Risk Entities, and Interested
Third Parties**

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Taxpayer Number: 509 113 010 | Registered at the Lisbon C.R.C under the same number
Share Capital 1.200.000.00€

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ARTICLE 1 – SCOPE

1. Under the terms of Article 4 of Regulatory Standard 10/2009-R of June 25, insurance companies are responsible for defining and approving a policy for the treatment of policyholders, insured persons, beneficiaries, or injured third parties, as well as for its proper implementation and the monitoring of its compliance.
2. As a service provider on behalf of insurance companies, RNA interacts directly, within the scope of its activity, with policyholders, insured persons, beneficiaries, or injured third parties. Therefore, it is deemed essential to affirm its values and principles in this regard.
3. This document reflects the principles that guide RNA and represent its values, and accordingly, the behaviour of both its employees and its service providers in their interactions with the third parties, mentioned above, must be aligned with these principles.

ARTICLE 2 – FAIRNESS, DILIGENCE, AND TRANSPARENCY

1. RNA employees, as well as its service providers, must ensure that all policyholders, insured persons, beneficiaries, or injured third parties are treated fairly, diligently, and transparently in the performance of their duties.

ARTICLE 3 – INFORMATION AND CLARIFICATION

1. All decisions made by RNA employees in the course of their duties must be properly communicated, clarified, and justified, according to the complexity and nature of the situation and the profile of the interested party.

ARTICLE 4 – COMPLAINT MANAGEMENT

All complaints submitted by policyholders, insured persons, beneficiaries, or injured third parties are handled with total respect for the complainant, without any cost, burden, or charge to them.

ARTICLE 5 – CUSTOMER VULNERABILITY

In dealing with policyholders, insured persons, beneficiaries, or injured third parties, RNA takes into consideration situations of special vulnerability, including, but not limited to, illness, age, financial difficulties, communication challenges, or language barriers, ensuring fair and appropriate treatment to address the specific situation faced by the individual.

ARTICLE 6 – PROCESSING OF PERSONAL DATA

The processing of personal data of policyholders, insured persons, beneficiaries, or injured third parties must be carried out in full compliance with applicable legislation on the protection and confidentiality of personal data. RNA commits to observing the necessary information security measures appropriate to the risk associated with the processing of such data.

ARTICLE 7 – PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST

1. RNA employees commit to reporting any situations that may, for any reason, involve a conflict of interest.
2. A "conflict of interest" is any situation in which an employee may be understood to have a direct or indirect interest in the matter, as well as their spouses or first-degree relatives or in-laws, and any companies or other legal entities in which they hold a direct or indirect interest.
3. RNA will assess the reported situation and issue recommendations aimed at mitigating or eliminating the conflict of interest.

ARTICLE 8 – SPEED AND EFFICIENCY

RNA employees commit to performing their duties, whenever dealing with processes involving policyholders, insured persons, beneficiaries, or injured third parties, with

speed and efficiency, without compromising accuracy, quality, or customer service, particularly in matters related to claims and complaints management.

ARTICLE 9 – APPROPRIATE QUALIFICATIONS

All RNA employees have the necessary training and qualifications to carry out the duties through which they interact, directly or indirectly, with policyholders, insured persons, beneficiaries, or injured third parties.

ARTICLE 10 – DISCLOSURE

RNA internally disseminates its policy on the treatment of policyholders, insured persons, beneficiaries, or injured third parties so that its employees are made aware of it.