

## 1. Introduction

At Aura Global, we're committed to protect and respect your privacy.

This Privacy Notice explains how Aura Global FZ-LLC ("Auras Insure", "we", or "us") handles your personal data (also known as personal information in certain jurisdictions).

This Privacy Notice does not intend to conflict with applicable local privacy laws. In case there is a conflict, the applicable local privacy laws will prevail.

We may change this Privacy Notice (also known as Privacy Policy in certain jurisdictions) from time to time. We will always make the latest Privacy Notice available to you via this page. Any changes to this Privacy Notice will apply to you and your data immediately.

With respect to the services provided by Auras Insure, this Privacy Notice describes:

- Who are we?
- Services provided by Auras Insure
- Data Controllers
- How do we collect your personal data?
- The lawful basis for processing your personal data
- How is your personal data used?
- How long do we hold your data?
- Who do we share your personal data with?
- Transferring your personal data offshore
- Your rights
- How Auras Insure protects your personal data
- Monitoring
- Technology
- Our contact details and how to ask questions or make a privacy-related complaint
  - The date this Privacy Policy was last updated

#### 2. Who are we?

Auras Insure is an Insurance agent of IC UPSK (Ukraine) and IC Lev Ins (Bulgaria).

Auras Insure manages the website for online sales of travel insurance policies of the mentioned companies. Auras Insure takes responsibility to



provide maximum available information for clients for them to choose the best suitable package of travel insurance.

Auras Insure only provides front-end support on behalf of its clients and in accordance with the respective contracts with them regarding such services/support.

## 3. Services provided by Auras Insure

a. Development and maintenance of the website offering travel insurance;

b. Providing information about such insurance, additional options and their pricing;

c. Collecting payments on behalf of its Partners;

d. Delivering insurance policies against selected options and made payments by email.

b. Additional services as our customer

Services offered by Auras Insure are purely optional/discretionary services, which are offered to the customer directly available under a contract between Auras Insure and the customer at an additional service charge.

#### 4. Data Controllers

a. When processing your request on travel insurance procurement

Selected Insurance company is the responsible party for the use of the personal data you provide in the visa/ permit or travel document application form and, consequently, for the data received from your side in connection with the processing of your visa/ permit or travel document application.

This role is known as "Data Controller" as established in Regulation (EU) 2016/679 (General Data Protection Regulation). However, it can have different names such as "Organization," "Data Fiduciary," "Responsible Party," "Data Handler," or similar, depending on your country of residence.

b. When preparing price proposal upon your data and options selected as our customer

When Auras Insure prepares an offer of travel insurance for you, we can collect such relevant data as your full name, date of birth, passport number and validity, etc., Auras Insure is responsible for processing the personal data you provide in connection with these services; hence Auras Insure is the Data Controller for these steps.



# 5. How do we collect your personal data?

Auras Insure collects personal data about you when you request our services when you purchase any of travel insurance at Auras Insure's website.

When you provide these details in a web form on our website, Auras Insure collects and processes the personal data provided by you in order to deliver the service requested. Such information may consist of the following:

- First Name.
- Last Name.
- Email address.
- Mobile Phone Number.
- Passport number and it's validity.
- Credit/debit cards' details.
- Application reference number.

Please note that it is not mandatory to provide your personal data for requested services. However, without providing the required personal data, we will not be able to deliver the service.

Children's privacy protection

Our services are not designed for, or intentionally targeted at children. When we process data from children, we will require parental or guardian consent.

## 6. Lawful basis for processing your personal data

If the data protection law in your country of residence allows, Auras Insure will use the lawful basis of "performance of a contract." What this means in plain terms is that when you purchase a service from Auras Insure, you enter into a contract with us to deliver that service. We could not deliver that service without using some personal data from you, by entering into that contract implies you have given your permission for us to process that personal data.

If the data protection law in your country of residence does not have the lawful basis of "performance of a contract," then Auras Insure will ask for your consent for the processing of your personal data before the payment is done.

## 7. How is your personal data used?

Auras Insure will use your personal data in order to provide additional services to you, including for the following purposes:



1. to calculate the price of the Travel insurance you would like to buy;

2. to send provided details to the Insurance Company for Policy generation;

3. to send the generated Policy and receipt to you;

4. with your prior permission, to send you information that you have requested and that may be of interest to you.

# 8. How long do we hold your data?

For purchase purposes, we retain and hold, for a limited time, a small amount of personal contact information in order to be able to perform a requested service, such as preparing a price offer and requesting a policy for you. This information is retained by Auras Insure till the payment is successful.

All credit/debit cards' details and personally identifiable information will NOT be stored, sold, shared, rented or leased to any third parties.

If you make a payment for our products or services on our website, the details you are asked to submit will be provided directly to our payment provider via a secured connection.

Auras Insure will not pass any debit/credit card details to third parties.

## 9. Who do we share your personal data with?

We may share or disclose your contact information with our suppliers and partners where it is necessary for the processing of your requests or to deliver a service that you have requested.

We only use suppliers and partners that have sufficient privacy and data protection measures in place.

Auras Insure takes appropriate steps to ensure data privacy and security including through various hardware and software methodologies. However, (<u>https://auras.insure/</u>) cannot guarantee the security of any information that is disclosed online.

We do not sell your personal data to third parties.

We are not responsible for the privacy policies of websites to which it links. If you provide any information to such third parties different rules regarding the collection and use of your personal information may apply. You should contact these entities directly if you have any questions about their use of the information that they collect.

# Page 04



Some of the advertisements you see on the Site are selected and delivered by third parties, such as ad networks, advertising agencies, advertisers, and audience segment providers. These third parties may collect information about you and your online activities, either on the Site or on other websites, through cookies, web beacons, and other technologies in an effort to understand your interests and deliver to you advertisements that are tailored to your interests. Please remember that we do not have access to, or control over, the information these third parties may collect. The information practices of these third parties are not covered by this privacy policy.

#### **10. Transferring your personal data offshore**

In order to provide a service to support your travel insurance, we will transfer your personal data to our coverholders.

The sharing of your personal data with certain recipients may imply transfers of your data out of the European Economic Area (EEA). We pay particular attention to the protection of your personal data. Thus, where such transfers out of the EEA shall take place, we first implement appropriate safeguards by signing the standard contractual clauses of the European Commission with the entity out of the EEA, which processes your personal data.

## **11. Your rights**

Under many data protection laws, you have rights with regard to how your personal data is handled. These privacy rights vary from country to country; however, in Auras Insure, we enable you, subject to all relevant laws, to exercise a full range of data protection rights depending on the applicable jurisdiction. It includes, among others:

• The right to be informed how your personal data is being used.

- The right of access and a copy of your personal data.
- The right to rectification if your personal data is incorrect.

• The right to erasure your personal data (where the law permits this).

- The right to restrict the processing of your personal data.
- The right to data portability.
- The right to object to how your personal data is used.

• Rights in relation to automated decision making and profiling.

• Registering a concern about data privacy.

• Requesting a copy of your personal data, correcting inaccurate personal data, and deletion of personal data.



You can exercise your rights by contacting Auras Insure at: info@auras.insure

## 12. How does Auras Insure protect your personal data?

We are committed to protecting all personal data that we hold about you. When you give us personal data, we take steps to ensure that it is safeguarded and held securely. Any sensitive information is encrypted and protected.

On our websites, when you are on a secure page, a lock icon will appear in the address bar of most web browsers. This means the transfer of information from your browser to our web servers is encrypted to keep it safe.

Please bear in mind that emails may be transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, please do not include personal data in an email when you communicate with us. If you do, you do so at your own risk.

#### 13. Technology

#### a. Use of cookies

Like many other websites, the Auras Insure websites use Cookies. 'Cookies' are small pieces of information sent by an organization to your browser and stored on your device. We use them to help collect statistical information about your browsing actions and patterns. Other uses are to set your preferred language and tell your browser what pages you have already visited so that you can use the "Back" function. Cookies help us to improve our websites and deliver a more personalized service.

We provide the choice for you to accept or refuse the use of cookies when you visit our websites, and you can change the cookie settings at any time.

Please note that disabling cookies may result in a loss of functionality when using our website.

#### b. Links to other websites

Our websites may contain links to other websites run by other organizations. This Privacy Notice applies only to this website, so we encourage you to read the relevant Privacy Notices on the other websites you visit.

Please note that if you link from our website to another website, or if you follow a link to arrive at our website, we cannot be responsible for the content or practices of those third-party websites. We recommend that you check the Privacy Notices and statements of that third-party website.

## Page 06



# 14. Questions, complaints, and contact details

We are committed to protecting your privacy. If you wish to contact us or if you have any questions or wish to lodge a complaint about our privacy practices or the way we have handled your personal data, including if you believe that there has been a possible breach of any relevant privacy principles, you may contact us at: info@auras.insure

For any complaint, please include details about your complaint. On receipt of a complaint, we will endeavor to carry out any necessary investigations in a timely manner. We will respond to all complaints within a reasonable time, or such earlier time as required by law.

# 15. Latest Update

This Privacy Policy was last updated in April 2023.

