# REGULATIONS ON HIGHDOME PCC LIMITED'S TREATMENT AND HANDLING POLICY IN RELATIONSHIP TO POLICYHOLDERS, INSUREES, BENEFICIARIES OR INJURED THIRD PARTIES

#### **ARTICLE ONE**

#### **OBJECT**

- 1 These Regulations, henceforth "Regulations", establish the principles adopted by HIGHDOME PCC LIMITED, henceforth "HIGHDOME", within the scope of its relationships with Policyholders, Insurees, Beneficiaries or Injured Third Parties, under the terms set out by Regulatory Norm nº 10/2009 of 25 June, amended by Regulatory Norm nº 2/2013 of 10 January.
- 2 The principles in these Regulations have been approved by the governing body of HIGHDOME, considering all its employees and distribution channels, to which these regulations are applicable.

#### **ARTICLE TWO**

#### **PUBLIC AVAILABILITY**

HIGHDOME ensures that these Regulations are permanently available across its internal structures, as well as its public availability through any means that at any time should prove more adequate, namely on Internet sites or on paper if requested.

## **ARTICLE THREE**

# **EQUITY, DILIGENCE AND TRANSPARENCY**

HIGHDOME employees, as well as any other persons or entities who, on behalf of HIGHDOME, establish and maintain contact with Policyholders, Insurees, Beneficiaries or Injured Third Parties, must contribute to their receiving equitable, diligent and transparent treatment.

#### **ARTICLE FOUR**

# **INFORMATION AND CLARIFICATION**

- 1 HIGHDOME employees must, when carrying out their duties, provide information adequate to clarify questions put to them by Policyholders, Insurees, Beneficiaries or Injured Third Parties, taking into account the profile, nature and complexity of the circumstances, so as to permit informed decision-making.
- 2 In every communication with Policyholders, Insurees, Beneficiaries or Injured Third Parties, by any means of communication employed, information and clarifications indicated above must be purveyed clearly and intelligibly, taking into account the specific traits of the medium and those of the person addressed.

# **ARTICLE FIVE**

**PERSONAL DATA** 

- 1 HIGHDOME's handling of Policyholders', Insurees', Beneficiaries' or Injured Third Parties' personal data (data subjects) must strictly observe applicable legal norms on the protection of personal data.
- 2 HIGHDOME, as data processor, collects and processes personal data only as specifically necessary and adequate to the ends determined, related to carrying out its business as an insurer and, should HIGHDOME engage a subcontractor to carry out a given type of personal data processing, subcontract must always act on behalf of HIGHDOME, per personal data processing agreements to be entered into.
- 3 Data subjects will be afforded their right of access, update and rectification of their personal data, as well as their right to object to the processing of their data, pursuant to direct contact, or contact in writing, with HIGHDOME; this does not limit their right to register complaints with the pertinent oversight authority.
- 4 Personal data collected will be maintained so as to permit their identification during the period necessary to pursue the ends of collection or later processing, after which the data will be permanently deleted.
- 5 HIGHDOME makes its best effort to protect the personal data of data subjects against unauthorized access. To this end, it uses security systems, rules and other procedures so as to guarantee the protection of subjects' personal data, as well as defend against unauthorized access to data, their improper use, publishing, loss or destruction.
- 6 HIGHDOME ensures that access to personal data is limited only to its employees who, in order to carry out their duties, require access to them, and said employees undertake to comply with their duty of confidentiality regarding the data.

#### **ARTICLE SIX**

# PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST

- 1 HIGHDOME employees must refrain from participating in situations that could generate conflicts of interest and must report such facts as soon as they are made aware of them.
- 2 For the purposes of the paragraph above, and other case-by-case assessments notwithstanding, a conflict of interest is deemed to exist in situations where employees participate in processes that involve their next of kin, as well as legal persons that they hold a direct or indirect stake in or where they have any influence in management.

#### **ARTICLE SEVEN**

## **SPEED AND EFFICIENCY**

- 1 Employees must, within the HIGHDOME frameworks and according to their role in the organization, speedily and efficiently manage processes involving Policyholders, Insurees, Beneficiaries or Injured Third Parties, namely on matters connected with claims and complaints.
- 2 The above notwithstanding, process & case management must always follow quality criteria that guarantee the satisfaction of the people involved in those cases.

#### **ARTICLE EIGHT**

# **ADEQUADE QUALIFICATION**

HIGHDOME ensures that its employees are duly qualified, namely employees who establish and maintain direct contact with Policyholders, Insurees, Beneficiaries or Injured Third Parties, so as to guarantee quality service, be it remotely or in person.

## **ARTICLE NINE**

## **ANTI-FRAUD POLICY**

- 1 HIGHDOME has developed a policy for prevention and oversight of fraudulent action in insurance contracts, with permanent vigilance across the organization.
- 2 Pursuant to request from Policyholders, Insurees, Beneficiaries or Injured Third Parties, HIGHDOME will provide the information indicated by the paragraph above as fits each individual situation.
- 3 HIGHDOME may enter into cooperation protocols with other entities, public or private, tending toward the implementation of preventative measures or measures to handle situations that present signs of fraud.

## **ARTICLE TEN**

# TREATMENT AND HANDLING POLICY

HIGHDOME ensures the necessary publishing and clarification of the rules contained in the Regulations so as to guarantee their enforcement, reporting and monitoring.