

TREATMENT POLICY | FIDELIDADE

Treatment policy of Fidelidade - Companhia de Seguros, S.A., within the framework of its relationship with policyholders, insured persons, beneficiaries or injured third parties.

DISCLAIMER: NONCOMMITTAL TRANSLATION. THIS IS A FREE TRANSLATION INTO THE ENGLISH LANGUAGE FROM THE ORIGINAL PORTUGUESE VERSION AND IS INTENDED ONLY FOR SUPPORTING PURPOSES. THE ONLY BINDING WORDING IS THE ONE IN THE PORTUGUESE LANGUAGE.

Article 1

SCOPE

1. This Policy enshrines the principles adopted by Fidelidade - Companhia de Seguros, S.A., hereinafter referred to as the Company, in its relationship with policyholders, insured persons, beneficiaries or injured third parties.
2. The principles set out in this Policy reflect the Company's vision and values, reflecting the behaviour expected of all its employees, including employees of the distribution channels and all those who, on behalf of the Company, provide services to policyholders, insured persons, beneficiaries or injured third parties.

Article 2

FAIRNESS, DILIGENCE AND TRANSPARENCY

Employees must contribute to ensuring that all policyholders, insured persons, beneficiaries or injured third parties are treated fairly, diligently and transparently, with respect for their rights.

Article 3

INFORMATION AND CLARIFICATION

Employees must, in the performance of their duties, ensure that policyholders, insured persons, beneficiaries or injured third parties, taking into account their profile and the nature and complexity of the situation, are provided with the legally required information and clarification that allows them to make an informed and reasoned decision.

Article 4

PERSONAL DATA

1. The processing, with or without automated means, of the personal data of policyholders, insured persons, beneficiaries or injured third parties must be carried out in strict compliance with the applicable legal rules and the technical and organisational security rules appropriate to the risk related to the processing of the data.
2. The data protection Policy includes information on the rights of data subjects and is available on the Company's website.

Article 5

PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST

1. Employees must disclose to the Company all situations that may give rise to conflicts of interest and refrain from intervening in such situations.
2. A conflict of interest is deemed to exist whenever employees are directly or indirectly interested in the situation or process in progress, or their spouses, relatives or first-degree relatives, or companies or other collective entities in which they directly or indirectly participate.

Article 6

SPEED AND EFFICIENCY

Employees shall perform the functions or tasks assigned to them with rigour and quality, with a view to the swift and efficient management of processes relating to policyholders, insured persons, beneficiaries or injured third parties, in particular with regard to claims and complaints.

Article 7

ADEQUATE QUALIFICATION

The Company ensures the adequate qualification of its employees, in particular employees who contact policyholders, insured persons, beneficiaries or injured third parties directly, in order to guarantee the quality of service, both face-to-face and non-face-to-face.

Article 8

TARGET MARKET FOR THE PRODUCTS

1. The Company identifies the target market for each insurance product so that when it or its distributor markets it, it is clear to whom the product should be presented, in line with their characteristics, profile and needs, including the definition of standardised profiles for which a given product is generally considered unsuitable.
2. The target market for the products is reviewed periodically and whenever an exceptional situation dictates.

Article 9

COMPLIANCE WITH THE TREATMENT POLICY

The Company ensures the necessary disclosure and explanation of the rules contained in this Policy, in order to guarantee compliance.

Article 10

INTERNAL REPORTING OF THE TREATMENT POLICY

The Company, through the risk management and internal control system, as well as the autonomous function responsible for market conduct, provides the mechanisms for reporting and monitoring compliance with the treatment policy.