



Privacy Notice

1. Introduction and purpose of this notice

For the Europ Assistance Group, the protection of your personal data and your privacy is a major concern.

This privacy notice concerns the insurance products and/or services offered by Europ Assistance (Suisse) Assurances SA and Europ Assistance (Suisse) SA (hereinafter "Europ Assistance", "we", "our", as appropriate).

To be able to offer and carry out our various insurance and services activities, we process the personal data of customers (and potential customers), beneficiaries and partners ("you", "your"). Processing personal data means any handling of personal data, in particular collecting, storing, keeping, using, modifying, disclosing, archiving, deleting or destructing data in accordance with the law.

This privacy notice outlines our commitments and sets out our approach for protecting your personal data and explains which data we might collect and how we might use it (within our organization and with partners) and within which legal framework.

Please take the time to read this privacy notice carefully. It may be updated directly on our website. We thank you for your trust in us and remain at your disposal for any questions at: eachdpc@europ-assistance.ch.

2. Who processes your personal data?

To be able to offer you insurance products and services, Europ Assistance has two operational companies in Switzerland, which may act as data controller or data processor depending on the circumstances.

2.1 Legal information

Europ Assistance (Suisse) Assurances SA is a limited company registered in the trade register of the canton of Vaud under company identification number CHE-101.333.746, having its address at Avenue Perdttemps 23, 1260 Nyon. It is an insurance company subject to supervision by FINMA (Swiss Financial Market Supervisory Authority).

Europ Assistance (Suisse) SA is a limited company registered in the trade register of the canton of Vaud under company identification number CHE-108.684.098, having its address at Avenue Perdttemps 23, 1260 Nyon.

2.2 Identity of the data controller

The identity of the data controller is specified in your contractual documentation.

3. How do we process your personal data?

We may process your personal data for the following purposes:

3.1 Provision and performance of our insurance products and/or services

- Proposal or conclusion of an insurance contract;
- Evaluation of the risks to be insured, calculation of premiums and profitability;
- Underwriting, management and execution of your insurance contract;
- Management and execution of your service contract;
- Confirmation of your eligibility for an insurance product or service;
- Reporting and processing of insurance claims;
- Reporting assistance cases and providing assistance services;
- Organization of satisfaction surveys with the beneficiaries of insurance products and services;
- Management of possible claims, pre-litigation and litigation;
- Reinsurance.

3.2 Processing activities in connection with the use of our websites

- Processing of your requests (in particular for information, claims or partnerships) submitted via our contact details and contact forms.

3.3 Processing activities necessary for compliance monitoring and for complying with legal and regulatory obligations

- Compliance with regulations concerning insurance supervision;
- Compliance with regulations on the fight against money laundering and the financing of terrorism, asset freezing measures and financial sanctions, for example the processing of alerts and suspicions;
- Group whistleblowing procedures;
- Compliance with tax regulations;
- More generally, compliance with criminal and administrative police regulations;
- Prevention, detection and fighting abuse and fraud, particularly insurance fraud;
- Compliance with data protection regulations.





3.4 Processing activities for the analysis and enhancement of our products and services

- Reporting activities and statistical analysis;
- Carrying out actuarial and commercial studies;
- Evaluation, improvement and design of our insurance products and services and calculation of our rates (for example, improving the user experience, enhancing customer service through training);
- Improvements to our administrative management (processes, products, services);
- Ensuring the security and proper functioning of our IT systems, and protecting our employees and our assets;

3.5 Processing activities carried out in the context of promotional activities

- Marketing operations and communications.

3.6 Other purposes

If we need to process your personal data for purposes other than those mentioned above, we will use them within the framework of applicable legal provisions and the original purposes. In other cases, you will be informed in advance.

4. What are the legal bases or legitimate grounds for our processing of personal data?

Most of the personal data processing described above are necessary for carrying out the pre-contractual phase and the proper performance of our contractual obligations to you (whether or not we have entered into a contract directly with you).

We may also process your personal data:

- For our legitimate interest, for example to conduct marketing operations or improve our administrative management;
- Where necessary to comply with our legal obligations, for example to fight the financing of terrorism;
- In certain exceptional cases, in your vital interest or that of another individual, for example with a case of medical assistance abroad.

If processing your personal data is required for a purpose not covered by our contract, our legitimate interests or a legal obligation, we may ask for your consent.

5. What personal data do we use?

We may process the types of personal data described below. Only personal data relevant to the purposes for which they are collected are processed. When we ask you for personal data, you have the right not to comply with our request. However, such refusal may prevent us from performing our contractual obligations towards you. The conclusion

or performance of an insurance contract, the handling of a claim, or the management of assistance cases requires the processing of your personal data, including, where applicable, sensitive personal data such as health data.

5.1 Type of data

Europ Assistance process the following in particular:

- Documents and identification data (such as your name and date of birth);
- Contact data (such as your address, telephone number and email);
- Data concerning your relatives and/or your family (such as their name and date of birth);
- Data about your animals;
- Data about your vehicle (such as the number plate);
- Data about insured devices (such as the IMEI number with mobile phones);
- Data concerning your usage of cyber tools (cyber assistance product);
- Data concerning your home;
- Data concerning your movements and geolocation;
- Image and sound recording;
- Health-related data;
- Information concerning ongoing criminal proceedings (such as motoring offences);
- Banking and payment data;
- Data concerning the claim or assistance case for which you contact us;
- Login and usage data from our digital platforms;
- Data concerning your use of our websites (through cookies). Our cookie policy is available on our website.

Phone calls may be recorded. The recordings are preceded by an informational voice message.

5.2 Health-related data

Your health data are sensitive personal data and we apply a higher level of protection to them. In particular, we ensure that we only use them when strictly necessary and keep access to them to a minimum.

5.3 Origin of the data

The personal data collected come mainly from:

- Information you provide to us, whether orally or in writing, or that you communicate to one of our partners;
- Information provided by a beneficiary when the insurance products or services cover multiple persons;





- Information provided by third parties (such as employers, banks, insurers, reinsurers or health organizations);
- Additional information necessary for handling your claim or assistance request, provided by persons involved in a claim or any other event requiring our intervention (such as healthcare professionals, other insurers, of your relatives);

Should your personal data be shared by a person other than you, Europ Assistance invites you to give the appropriate directives to the person you appoint to ensure the protection of your personal data. Should you share the personal data of another individual, you must ensure to have received the appropriate directives and consent to ensure the protection of personal data of this person.

6. With whom do we share your personal data?

6.1 Potential recipients of personal data

Personal data may be communicated:

- Within Europ Assistance (Suisse) Assurances SA and Europ Assistance (Suisse) SA;
- To other companies of the Generali/Europ Assistance group (i.e. the direct and indirect subsidiaries of Assicurazioni Generali S.p.A.), in Switzerland or abroad;
- To our assistance providers, for the purpose of delivering our assistance services, in Switzerland or abroad. Please be aware that the provision of our assistance services requires the involvement of third-party providers and, consequently, the transmission of personal data to them, including health data where necessary (such as in the management of medical emergencies abroad or vehicle breakdown situations);
- To our other service providers and partners, in Switzerland or abroad (such as auditors, reinsurers or co-insurers, claims managers, intermediaries, distributors, IT service providers, and all other entities that carry out any technical, organizational and operational activity supporting the insurance related activities described above). We may use third party service providers to process, handle or assess the insurance claim and to provide the services linked to the purposes described above (e.g. fraud detection service providers, investigative agencies).
- To your family and friends in the event of a claim or other event requiring our intervention, bearing in mind that we will only communicate what is strictly necessary;
- Third parties with whom you have a contractual relationship (such as your employer, bank, insurers, reinsurers or health organizations), in accordance with your contractual relationship with them;

- For travel insurance claims, we may also share some relevant information regarding your claim (e.g. claim status, type, reason) with the booking platform (e.g. travel, accommodation, cruise) you use as far as this information is necessary for the adequate performance of the contract the booking platform has with you;

- As part of our fraud prevention, detection, and investigation activities, we may need to verify the authenticity of the supporting documents you have submitted for your claim by directly contacting the issuer or the relevant third-party organization;
- To official, state and supra-national bodies.

Only the data strictly necessary for the purposes described above are disclosed.

Our service providers and partners are legally or contractually bound to comply with data protection requirements.

6.2 Transfers of personal data abroad

As we work with service providers and partners located abroad, certain data may be transferred abroad.

We use cloud services from foreign providers. While we make every effort to keep data stored in Switzerland, this may not always be possible. In these situations, we give preference to countries within the European Union and to countries that ensure an adequate level of data protection.

We may therefore transfer your personal data outside of Switzerland in accordance with current law, to the following countries:

- In France, for the management of IT infrastructures, and the provision of specialized tools and applications to Europ Assistance group entities for accounting, finance, financial crime prevention, and the reporting of insurance claims and assistance cases
- In France, Germany, the Netherlands and Ireland for the storage of data ("cloud");
- In several European Union countries, mainly Germany, Austria and the Benelux, as we may use experts based in these countries or operational support teams;
- To service providers located in any country where you are situated when requesting our assistance services, or when reporting a claim that occurred abroad and where the transfer of your data to that country is required for its processing;

In that instance, if strictly necessary, we may transfer personal data to countries whose legislation does not ensure an adequate level of data protection. In these cases, we will seek to provide a higher level of





protection, including contractual protection, and you have the right to request information from us about the measures taken;

- In the United States, for our cyber assistance services and for customer satisfaction tracking.

Finally, you should be aware that in consistence with current market practises, the use of IT tools and applications means that certain development and support functions might be performed from countries outside of the EEA. In such cases, relevant contractual protection is required.

7. How long do we keep your personal data?

We will keep your personal data as long as necessary for the purposes mentioned above or as long as required by law.

8. Your rights regarding your personal data

8.1 General rights

You may exercise the following rights with respect to your personal data:

- **Access:** you may request access to your personal data;
- **Rectification:** you may ask us to correct your personal data if they are incorrect or incomplete;
- **Erasure:** you may ask us to delete your personal data, unless we are obliged or permitted to retain it on the basis of a legal requirement or our legitimate interests
- **Objection:** you may object to the processing of your personal data if there are no other overriding legitimate grounds for the processing, or you may object to the processing of your data for direct marketing;
- **Restriction:** you can ask us to restrict the way your personal data is processed, where permitted by law;
- **Portability:** you may request your data in a portable format where the processing is automated and based on your consent or on a contract;
- **Withdrawal of consent:** you have the right to withdraw your consent at any time for processing activities that are based on your consent.

8.2 Automated decisions

In the context of the conclusion or performance of the contract, it is possible that automated individual decisions (without human intervention) are taken regarding you (e.g. for calculating prices).

Should automated decisions have legal effects on you or otherwise significantly affect you, we will inform you and provide you with the opportunity to present your point of view, as required by applicable law.

In all cases, you may request that one of our staff members review your individual situation or submit a complaint.

As part of our continuous commitment to innovation and operational efficiency, we make use of artificial intelligence technologies. Our systems undergo regular audits to ensure that they remain fair, effective and accurate.

9. Contacts for the exercise of your rights

9.1 Europ Assistance

Your requests, including the exercise of your rights, can be addressed by email to: eachdpc@europ-assistance.ch or online by [completing this form](#).

Please clearly specify which right(s) you wish to exercise and the extent of your request.

Under applicable data protection laws, we may charge a reasonable fee, of which you will be notified in advance. We may also need to verify your identity, for example through official identification documents. In addition, Europ Assistance has appointed Europ Assistance Holding SAS, a simplified joint stock company registered in France (RCS 632 016 382) as its representative within the European Union for the purposes of article 27 of the GDPR. A data protection officer, within the meaning of Article 37 of the GDPR, has also been appointed and can be contacted at EAGlobalDPO@europ-assistance.com.

9.2 Federal Data Protection and Information Commissioner

If you consider that we are not respecting your personal data protection rights, you can file a complaint with the competent data protection authorities. In Switzerland, this function is performed by the Federal Data Protection and Information Commissioner: <https://www.edoeb.admin.ch>.

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