



**Privacy Notice
(Products & Services)**

Notice ref.	Application date
DP.N.PS.2023.09 (EN)	2023.09.01

1. Introduction - Purpose of this notice

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 services, we have to process the personal data of customers (and potential customers), beneficiaries and our partners ("you", "your"). Processing personal data means collecting, storing, protecting, modifying, disclosing and deleting data in accordance with the law.

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

Please take the time to read this privacy notice carefully. It may be updated directly on the 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.

With regard to the online-services.europ-assistance.ch website and the insurance products and services distributed there, the data controller is Europ Assistance (Suisse) Assurances SA.

3. How do we use your personal data?

We may use your personal data for the following purposes:

3.1 Processing for the provision of our insurance products and/or services

- Proposal of an insurance contract, evaluation of the risks to be insured and calculation of premiums;
- Underwriting, management and execution of your insurance contract;
- Provision of services;
- Processing of claims and assistance cases;
- Organisation of satisfaction surveys with the beneficiaries of insurance products and services;
- Management of possible claims, pre-litigation and litigation.

3.2 Processing 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 necessary to comply 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;
- Detection and prevention of abuse and fraud, particularly insurance fraud;
- Compliance with data protection regulations.





3.4 Processing necessary for the smooth conduct of our operations

- The evaluation, improvement and design of our insurance products and services and calculation of our rates;
- Improvements to our administrative management (processes, products, services);
- Ensuring the security and functioning of our IT systems, and protecting our employees and assets;
- Carrying out actuarial and commercial studies;
- Marketing operations.

3.5 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 foundations for our processing of personal data?

The greater part of the personal data processing described above is necessary to carry 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 it is necessary to process your data for any other purpose, we may require 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, this refusal may prevent our contractual obligations to you from arising or being fulfilled.

5.1 Type of data

Europ Assistance will 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 your use of our websites (through cookies). Our cookie policy is available on our website.

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 Provenance

The personal data collected may come mainly from:

- The data subject directly, orally or in writing;
- Third parties with whom the data subject has a contractual relationship (such as employers, banks, insurers, reinsurers or health organisations);
- Persons involved in a claim or other events requiring our intervention (such as healthcare professionals, other insurers, relatives of the data subject);
- The policyholder or one of the other beneficiaries when insurance products and services benefit several people.

When personal data are transmitted by a person other than the data subject, Europ Assistance assumes that the data subject has been informed of this transmission and has given their consent, if necessary.

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.), within and outside Switzerland;
- To our service providers and other partners (such as auditors, reinsurers or co-insurers, claims managers, intermediaries, distributors). We draw your attention to the fact that the implementation of our assistance products and services requires the intervention of third party service providers and thus the transmission of personal or even medical data to them (for example, during the management of medical emergencies abroad or car breakdown services);
- 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 organisations), in accordance with your contractual relationship with them;
- To official, state and supra-national bodies.

6.2 Transfers of personal data abroad

We may transfer your personal data outside of Switzerland in accordance with current law. This will be in particular the case for:

- Management of IT infrastructures in France (country with equivalent level of protection);
- Specialized IT tools and applications, such as for accounting and finance, claims with associated clouds, in France, Germany and Ireland (countries with equivalent level of protection)¹;
- Group procedures for quality management, financial crime and whistleblowing mainly situated in France and Italy (countries with equivalent level of protection);
- The provisions of services and handling of cases in performance of our contractual obligations. This might be the case if you require our services from abroad and/or if the use of service providers situated abroad is necessary.

In that instance, if strictly necessary, we may transfer personal data to countries, territories or organisations outside the EEA and not recognised as providing an adequate level of protection by the Swiss Federal Data

Protection Commissioner and/or the European Commission. 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.

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 can ask us to correct your personal data if they are incorrect or incomplete;
- **Deletion:** you can ask us to delete your personal data, in particular:
 - o If your personal data are no longer necessary for the purpose for which they were collected or processed;
 - o The processing of your personal data is based solely on your consent and you decide to withdraw it;
 - o You object to the processing of your personal data and there are no other overriding legitimate grounds for the processing, or you object to direct marketing processing.
- **Restriction:** you can ask Europ Assistance to restrict the way your personal data is processed for one of the following reasons:
 - o You dispute the accuracy of your personal data for a period allowing Europ Assistance to verify this data;
 - o The processing is unlawful and you object to the deletion of your personal data and request the restriction of their use instead;

¹ Our main cloud supporting our basic operations systems is located in Switzerland.





- o Europ Assistance no longer needs your personal data for the purposes of processing but you need them for the establishment, exercise or defence of legally founded claims.
- **Portability:** you can ask Europ Assistance to transfer to another organisation the personal data you have provided to us and/or ask to receive your personal data in a structured, commonly used and machine-readable format.

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). In particular, you can take out an insurance policy via the application forms on our website. You have the option of requesting the intervention of one of our staff.

9. Contacts for the exercise of your rights

9.1 Europ Assistance

Your requests, including the exercise of your rights, can be addressed to: eachdpc@europ-assistance.ch.

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.

The request to exercise your rights is free of charge, unless the request is manifestly unfounded or excessive.

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>.

