

Information on data protection at ERV.

Annex for the insurance business.

Version of August 2023

1 Preliminary remarks

ERV has produced this information on data protection to inform you, in your capacity as interested party, applicant, policyholder, person covered, co-insured person, beneficial owner and/or other data subject (e.g. recipient of correspondence, family member, premium payer, vehicle operator, injured party, beneficiary, party to contracts, contact person or representative of another insurer, customer, partner or supplier), about the processing of your personal data.

All personal data that ERV receives from you is "processed", i.e. collected or procured, stored, kept, used, transmitted or disclosed, adapted, archived or deleted or destroyed, in accordance with the current data protection legislation.

The term "personal data" refers to data that relates to a specific or identifiable person, i.e. inferences may be drawn as regards their identity on the basis of the data itself or in combination with certain additional data. In the following, the term "personal data" is used synonymously with "data". "Sensitive personal data" is a category of personal data that is more strictly regulated under data protection law. Sensitive personal data includes, for example, health data, data revealing racial and ethnic origin, information on religious or ideological convictions, biometric data for identification purposes and information on trade union membership.

In addition, any special features of the various types of insurance must be taken into account. Therefore, the information on data protection provided in connection with the individual process (e.g. application, conclusion of contract, processing of a claim) shall always apply.

2 ERV as the data controller

The following companies are responsible for data processing in the course of their activities:

- European Travel Insurance, a branch of Helvetia Swiss Insurance Company Ltd

(hereinafter collectively referred to as "Helvetia")

Below and in ERV's "List of recipients and countries" at www.erv.ch/datenschutz as well as in the general insurance and business terms and conditions and the final policy documents, you will find details of third parties to whom data is transferred and who may be responsible for their processing. If you have any questions or wish to exercise any rights against these third parties, you should contact them directly.

If data subjects have questions about data protection and the rights of data subjects, they can contact ERV using the subject line "data protection". This will allow them to address the data protection officer of ERV.

Europäische Reiseversicherung
Data Privacy
St. Alban Anlage 56, P.O. Box
4002 Basel

3 Legal basis for the processing of personal data

This information on data protection is designed to comply with the requirements of the Swiss Federal Act on Data Protection ("FADP") and the EU's General Data Protection Regulation ("GDPR") as amended. Whether and to what extent these laws are applicable depends on the specific individual case.

ERV may process your personal data in accordance with applicable data protection law.

"Processing" means any handling of personal data regardless of the tools and procedures used, particularly the collection, storage, keeping, use, modification (including pseudonymization and anonymization), disclosure, archiving, deletion or destruction of data.

The processing must not unlawfully infringe the personality rights of data subjects, and any processing may be based on the following legal basis under data protection law:

- Existence of a contract with ERV
- Legitimate interests of ERV
- Statute
- Consent by you or a person authorized by you

Legitimate interests are aimed at achieving the objectives associated with the purposes listed in the following section.

4 Purposes of data processing

The processing of your personal data is essential for ERV's business purpose or the provision of services and the fulfilment of contracts.

ERV processes data in particular for the following purposes:

- Establishment, administration and processing of contractual relationships
- Marketing purposes and in order to provide pertinent advice, support and relationship management
- Compliance with laws, directives and recommendations of authorities in Switzerland and abroad and internal rules
- Market research, to improve services, operations, products, to track behaviour, activities, preferences and needs, including analysis and evaluation of the use of the ERV websites
- Product and company development including the compilation of insurance-specific statistics, e.g. for the development of new tariffs
- customer management, customer profiling and contact management including outside of contract processing
- Risk management as part of prudent corporate governance, including operational organization and corporate development
- Prevention and protection against insurance fraud
- providing protection for data, secrets, assets, persons, systems and buildings (e.g. video surveillance)
- Exchange of information between group companies

- Collaboration with business partners
- Security purposes and system access control
- Portfolio modelling
- Other purposes

5 Profiling and automated individual decisions

Profiling refers to any kind of automated processing of personal data comprising the analysis of specific personal aspects, such as economic situation, health, interests, reliability, behaviour, or relocation.

ERV uses profiling to analyse certain personal aspects (such as interests, preferences, age, duration of the business relationship, demographic components, behaviour in debt recovery matters, credit scoring, purchasing power, customer value, loyalty components, margin information, premiums, claims and benefits information, general contract information, contractual term, marital status information) of data subjects to allow ERV to make individualized product recommendations or other offers and to enhance the customer experience, but also to identify risks of improper use and safety risks. By using data analysis procedures based on data from customer management systems, ERV obtains additional statistical information to assess the risk of customer attrition and to assess the contractual relationship forecast.

If a fully-automated individual decision is made (e.g. after entering personal data when submitting an application) which leads to a negative legal consequence or significantly affects the data subject, ERV will notify the data subject accordingly and they have the option of contacting ERV to request that the decisions in question be reviewed by a human being. Examples of such decisions are the automated conclusion of a contract subject to conditions or the automated termination of a contract or the automated definition of any exclusions of benefits. Based on information about an insured event, ERV might, for example, make a fully-automated decision about the rejection of an obligation to pay benefits. Any fully-automated decisions are, however, always based on rules for weighing the information as laid down by ERV in advance.

6 Categories of personal data

The personal data processed by ERV includes data that has been provided by data subjects, collected from them, or is publicly accessible. Data categories include:

- Communication data
- Contract data
- Master data
- Banking, financial and asset-related data
- Claims data
- Health data
- Registration data
- Technical data
- Data regarding behaviour and preferences
- Security, warranty and compliance data
- Other data (e.g. powers of attorney, official certificates, etc.)

This category includes any data derived from the above.

7 Exchange of personal data with third parties

In order to optimize the discharge of business processes and the conclusion of contracts, or the processing of contracts and the provision of services, ERV or any parties engaged by ERV may collect relevant personal data from third parties (e.g. reinsurers, insurance intermediaries, employers, credit agencies, data suppliers, address traders, other insurers, banks, doctors and medical service providers, official bodies, authorities, experts, external lawyers, detective agencies) if this is necessary. The following data categories may be collected in the process:

- Communication data
- Contract data
- Master data
- Banking, financial and asset-related data
- Data regarding behaviour and preferences
- Claims data
- Health data
- Security, warranty and compliance data
- Other data (e.g. powers of attorney, official certificates)

Based on the transmission of the insurance application or notification of a claim, the third parties are expressly released from their duty of confidentiality vis-à-vis ERV and any third parties engaged by ERV.

In addition to obtaining the relevant information, the processing of the conclusion of the contract or the provision of services may require the transmission of personal data to third parties. However, even after having been disclosed the data remains subject to the provisions of the applicable data protection legislation. In addition, ERV places these third parties under an obligation to handle the data appropriately depending on the sensitivity of the data and other circumstances.

The data may be passed on to recipients in Switzerland and abroad if the circumstances of the data processing so require. For further details, please see ERV's "List of Recipients and Countries" at www.erv.ch/datenschutz.

In each case, ERV or the third party will inform you appropriately about the collection of personal data.

8 Disclosure of personal data to countries outside of Switzerland

Your personal data will only be passed on to data processors outside of Switzerland if they are subject to adequate data protection laws. If data is transmitted to a country without adequate data protection, ERV ensures adequate protection by means of EU standard contractual clauses or relies on the exception of consent, contract performance or the establishment, exercise and enforcement of legal rights.

The schedule "List of recipients and countries" contains further information regarding recipients of personal data and lists countries to which ERV transmits data.

9 Information systems used by the insurance industry

To combat insurance fraud, ERV is connected to the central information systems Car Claims Info and the Notification and Information System (Hinweis- und Informationssystem, HIS), which are operated by SVV SOLUTION AG.



The Car Claims Info database is used to store data of vehicles affected by a claim. This exchange of data between the insurers involved makes it possible to determine whether a reported vehicle claim has already been settled by another insurance company in the past. The claims history is checked automatically. The process involves an assessment of the potential for improper use in order to evaluate scenarios of improper use.

An entry will be made in HIS on the basis of predefined grounds for entry related to insurance law, with the exception of cases arising from the insurance of persons. Each individual entered in this system is informed thereof in writing.

These data collections are registered with the Federal Data Protection and Information Commissioner (FDPIC) and entries are made on the basis of a set of regulations known to the latter.

This database is owned by SVV Solution AG. For further information regarding HIS, please refer to www.svv.ch/his, and for information regarding Car Claims Info, please refer to www.svv.ch/cc-info, ERV is also connected to the information system CLS-Info, a database that stores operator and vehicle data of ERV customers which the driver and vehicle registration offices are required by law to obtain.

10 Retention period

ERV processes personal data for as long as is necessary to fulfil the above-mentioned purposes. Your data will be deleted as soon as they are no longer required for the above-mentioned purposes. Furthermore, ERV will store your data, for example, in order to meet statutory retention obligations. Statutory retention obligations typically amount to at least 10 years.

Moreover, ERV will store your data for as long as claims can be brought against ERV. Statutory limitation periods are between 5 and 20 years.

11 Data provision

The policyholder or beneficiary is obliged to provide the data required to assess the risk, perform the contract and handle claims. If they fail to meet that obligation, the conclusion of the contract or parts thereof, or the payment of all or part of the claim may be refused.

12 Data security

With regard to the processing of personal data, ERV takes adequate technical and organizational measures to prevent unauthorized access and otherwise unauthorized processing. These measures are based on the international standards in this area and are checked regularly and adjusted if necessary.

13 Rights of data subjects

The applicable data protection law as amended from time to time grants certain rights to data subjects provided certain conditions are met:

Right of access

The right to request information as to whether and which data ERV processes and to receive a copy of this personal data;

Right to rectification

The right to correct, complete and rectify inaccurate data;

Right to erasure

The right to request the erasure of personal data if ERV is no longer obliged or entitled to retain such personal data under the applicable laws and regulations;

The right to object to data processing and revoke consent;

The right to object to the processing of your personal data, in particular insofar as processing is based on legitimate interests or where data is processed for purposes of direct marketing, as well as the right to revoke consent insofar as data processing is based on consent;

Right to data portability

The right to request that ERV hand over certain personal data in a standard electronic format or transfer it to another controller;

Rights in the case of automated individual decision-making

The right of the data subjects to express their point of view in the case of exclusively automated decisions and to request that the decision be reviewed by a natural person;

Right to complain

Data subjects have the right to lodge a complaint with the competent data protection authority.

If you wish to exercise the above rights, you may do so by contacting the relevant data controller.

The applicable law grants you the right to obtain, upon request, further information necessary to exercise these rights.

These rights are subject to conditions, exceptions or restrictions (e.g. for the protection of third parties or trade secrets) under the applicable data protection law.

If your rights have been infringed, you have the option of submitting a complaint to the competent data protection authority (in Switzerland to the Federal Data Protection and Information Commissioner (FDPIC) [www.edoeb.admin.ch], in the EU to the relevant national data protection authority).

14 Communication channels with ERV

ERV would like to remind data subjects that the Internet is an open, global network that is accessible to everyone. Communication via e-mail is not usually encrypted and takes place only during regular office hours. It is possible that data may be lost or intercepted and/or manipulated by third parties, for example, to make it appear authentic. ERV takes appropriate technical and organizational security measures to prevent this from happening within the ERV system. Nevertheless, the confidentiality of data transmitted by e-mail cannot be guaranteed. This applies, in particular, to the transmission of sensitive personal data (such as health data). E-mails may be delayed, deleted, misrouted or shortened during transmission due to transmission errors, technical defects or other malfunctions. External access devices (PC, smartphone, etc. of end users) and parts of the infrastructure involved in the transmission between the sender and ERV are located outside the security area under the control of ERV. It is the responsibility of each Internet user to find out about the necessary security precautions and to take appropriate measures (e.g. up-to-date anti-virus software, etc.). ERV is not liable for any damage or consequences arising from the electronic exchange of information, particularly from the misuse of the e-mail system, which it did not cause itself. ERV reserves the right to seek redress from the data subject for any intentional damage it suffers as a result of business transactions



with the data subject via the electronic exchange of information. ERV reserves the right in individual cases not to reply by e-mail or to additionally require a different form (e.g. a form with a signature) for the order or information received by e-mail.

15 Right of modification

ERV reserves the right to modify this information on data protection at any time without prior notice. The version published at www.erv.ch/datenschutz applies as amended from time to time.

This privacy statement has been published in various different languages. If the content differs between these languages, the German version takes precedence.