

Information Sheet on Data Processing

As of May 2018

Below you will find detailed information regarding the way in which we process your data.

Insurer and Person Responsible

Europäische Reiseversicherung AG

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You can contact our **data protection officer** by e-mail at datenschutz@europaeische.at or by post at the above mentioned address with the further address "Data Protection Officer".

Necessity of Processing Personal Data

We and, if applicable, third parties that you are aware of, require your personal data for the establishment and administration of an insurance relationship and for the coverage verification in the event of a claim. If you do not provide us with this data, or do not provide it to the required extent, we may not be able to establish your desired insurance relationship or process your claim. Please note that this would not be considered a non-fulfilment of contractual duties on our part.

"**Personal data**" is defined as any information that relates to natural persons, either directly or indirectly (such as names, addresses, contract details).

Purpose and Legal Basis for the Use of Data

We use the personal data you have provided us with in our legitimate interest and to the extent necessary to properly establish and process our insurance relationship with you. Additionally, the data is used for producing statistics.

Some of our insurance products require that we process specially protected categories of your personal information. This is primarily data regarding your health, which we require to process claims, for example. We always process these only in accordance with the provisions of the Insurance Contract Act and, where required by law, after you have given your consent.

Your personal data is processed for pre-contractual and contractual purposes on the basis of Art. 6 para. 1 (b) GDPR. If special categories of personal data (for example, data concerning your health) are required for this purpose, we process them on the basis of statutory authorisation (e.g. § 11a Insurance Contract Act (VersVG)) or we obtain your express consent beforehand. If we create statistics using these data categories, this is done based on Art. 9 para. 2 j) GDPR in connection with § 7 GDP.

In addition, we process your personal data in order to fulfil legal obligations (for example, regulatory requirements, commercial and tax-related retention requirements or our general duty to provide advice). The legal basis for processing data in this case is the relevant legal regulations in connection with Art. 6 para. 1 c) of the GDPR.

We also process your data if required by Art. 6 para. 1 f) of the GDPR in order to safeguard our legitimate interests or those of third parties. This may, in particular, be the case for preventing and investigating criminal offenses.

If we have collected and processed your data after obtaining your consent, **you may revoke this consent at any time, meaning that we will no longer process your data for the purposes stated when you first gave con-**

sent starting from when we receive the consent revocation. The revocation does not affect the legality of processing the data up until the time when the consent was revoked.

Scope of Use of Health-related Data

If your health-related data is essential for assessing whether and under which conditions your insurance contract is to be concluded, as well as for assessing and fulfilling claims arising from a specific insured event and verifying the treatment services provided, in some cases, after obtaining your consent, we also collect health-related data regarding the diagnosis as well as type and duration of treatment through information from investigating or treating physicians, hospitals or other healthcare facilities or health care providers, as well as from social insurance institutions. Such information is necessary in individual cases for assessing the obligation to pay or for fulfilling the contract concerning illnesses, infirmities and accident-related injuries arising from the specific insured event.

In emergency cases (inpatient treatment, return transportation, etc.), the healthcare provider can charge the insurer directly for their services. This requires a contract from the policyholder or insured person affected by the claim event, which they must submit to the healthcare provider. When this contract is submitted, the insurer may collect the following data from the healthcare provider without the express consent of the policyholder or insured person:

1. For the purpose of obtaining confirmation of cover from the insurer: Data regarding the identity of the affected person, the insurance relationship and the admission diagnosis (data on inpatient or outpatient status, and on whether the treatment was caused by an accident);
2. For billing purposes and verifying services:
 - a. Data regarding treatment services provided (data on the reason for treatment and its extent), including a surgical report;
 - b. Data regarding duration of hospitalisation or treatment;
 - c. Data regarding the discharge or completion of treatment.

Collecting this data within the context of direct billing can be prohibited by the concerned policyholder or insured person at any time. Prohibition could result in the insurer denying coverage, at least provisionally, leaving the policyholder or insured person liable for payments that would have otherwise been covered.

Health-related data are generally used only in accordance with §§ 11 a-d of the Insurance Contract Act and without your expressly given consent in individual cases, only to the following recipients: Healthcare providers, social insurance agencies reinsurance companies or co-insurers, other insurers or institutions involved in the settlement of claims arising from the insured event, specialists consulted by the insurer, legal representatives or representatives you have authorised, courts, public prosecutors, administrative authorities, arbitration boards or other dispute resolution facilities and their subsidiary institutions (e.g. patients' ombudspersons) including specialists appointed by them.

Disclosure of Data to Third Parties

The complexity of the procedures regarding today's data processing sometimes obliges us to use service providers and commission them to process your data. Some of these service providers may be outside the territory of the European Union. However, in all cases where we use service providers, we always ensure that the European data protection level and European data security standards are maintained. If you would like to know more about how and to what extent we process your data in the specific case of your business or how we pass it on to service providers and which protective measures we have taken here, please contact us using the above-mentioned contact options. Our most important service providers are currently Generali Versicherung AG, Vienna and Europ Assistance GmbH, Vienna.

Due Diligence Obligations for the Prevention of Financing Terrorism

Due to legal provisions and the company's own regulations, we are obliged to comply with various due diligence obligations to prevent the financing of terrorism. Therefore, customer data is periodically compared with current sanctions lists (EU, UN, OFAC).

Use of Cloud Services

As an innovative and future-oriented company, we also use cloud solutions. We use the cloud services as part of our internal and external electronic communications, among other things, as well as for video conferencing, appointment management and shared document use in our internal cooperation.

Cooperation with Reinsurance Companies

When it comes to insuring certain risks, we work closely with our reinsurance companies. For this purpose, we exchange your personal data and details of your insurance relationship with them, but only for the purpose of jointly examining your insurance risk and your service claims, while taking into account the framework provided by the Insurance Contract Act. You can request additional information on reinsurance companies that may be employed using the above-mentioned contact options.

Cooperation with Intermediaries

If need be, intermediaries will look after you in your insurance matters. For the purposes of support and advice, the intermediary collects and processes your personal data and passes it on to check your insurance risk and to conclude your insurance relationship. In the event of a claim, the intermediary collects and processes the data relevant to processing the service and instructs us to perform a verification of the claim event. Similarly, we will provide your intermediary with enough personal data about you and your insurance relationship required for your intermediary to assist you.

Dissemination of Data to Regulatory Authorities, Courts and other Third Parties

We must disclose our policyholder's or insured person's personal data to authorities, courts, auditors, etc. within the framework of their statutory duties at their request. Likewise, when verifying your claim, we may need to involve third parties, such as doctors, hospitals, assessors, solicitors, or companies involved in claim settlement, and provide them with your personal information. In order to prevent and combat insurance fraud and insurance scams, we may be required to exchange certain personal data (such as name, date of birth, etc.) with the central information system of the Austrian Insurance Companies Association. However, in all these cases, we always ensure that the legal basis is adhered to and that the protection of your data is maintained.

Processing the Data of Persons Who Are Not Affiliated With Us in Any Insurance Contract

In order to establish an insurance relationship, it may be necessary for us to process data of persons who are not contracting parties.

If, within the framework of the contract, there is also insurance coverage for persons other than the policyholder, we also process their subsequent data, e.g. name, date of birth, etc. We also require this data in order to be able to provide the agreed insurance benefits in favour of the insured person or beneficiary in the event of a claim.

Similarly, we process personal identification and debt collection data of persons who accept the premium payment instead of the policyholder. We require this data in order to carry out the collection of premiums.

If a claim arises, we process third party data, e.g. the injured party, the injuring party, other persons involved in the incident or witnesses. These data include names, dates of birth and addresses, in particular. It is necessary that we process this data to determine the facts and to assess whether and to what extent an insurance payout is to be provided. However, we also require the data for law enforcement (e.g. assertion of claims for damages or recourse) or for protection from legal claims (e.g. as defence against unjustified claims).

Our Data Privacy

As a licensed insurance company, it goes without saying that all data traffic within our company is encrypted. We also have encryption options for external data traffic, provided that you, as the recipient of our communication, have the technical requirements for decrypting this. Please note that electronic communication using standard mail programmes (such as MS Exchange), does not provide absolute protection against third-party access and that this form of communication can also be used on non-European servers.

Similarly, it goes without saying that the data centres we commission comply with all safety standards. We also ensure that the service providers we use understand our view of security; we have chosen to work with them on the basis that they maintain similar or equivalent security measures. If you have any questions regarding our

specific precautionary measures for data protection concerning your business case, please contact the above-mentioned contact points.

Your Rights

You may request information regarding the origin, categories, duration of storage, recipients, data processed by us regarding you personally as well as your business case and the nature of such processing.

You may request that incorrect, incomplete or improperly processed data is corrected completed or deleted. If it is unclear whether the processed data concerning you is incorrect, incomplete or improperly processed, you may request that the processing of your data be restricted until such time as the matter has been finally resolved. Please note that these rights are complementary, so you can only ask for either the correction or completion of your data or their deletion.

Even if we have processed your personal data accurately and completely in compliance with the law, you may object to such data being processed in specific individual cases that you have justified. You may receive the personal data we have processed in machine-readable format designated by us, provided that we have received it from you personally, or you may instruct us to transfer that data directly to a third party chosen by you, provided that recipient has the necessary technical means to receive this and the transfer of data causes neither an unreasonable expense nor conflicts with legal or other confidentiality obligations or considerations to us or third parties.

If you have any concerns, we kindly ask that you to contact us using the contact details listed above, always providing proof of your identity, for example by submitting a copy of your ID.

If you have reason to believe that we are using your data without your permission, you have the right to appeal to the Austrian Data Protection Authority, Wickenburggasse 8-10, 1080 Vienna, telephone: +43 1 52 152-0, E-mail: dsb@dsb.gv.at.

Our Data Storage Procedure

We process your personal data, as far as necessary, for the duration of the entire business relationship (from the initiation and implementation to the termination of a contract) as well as in accordance with the statutory storage and documentation obligations, which may include, among others, the Austrian Commercial Code (UGB) and the Federal Fiscal Code (BAO).

In addition, it is important to consider that in certain cases, the duration of storage, statutory limitation periods, e.g. according to the Austrian General Civil Code (ABGB) may be up to 30 years.