

## **Data recipients**

Information in accordance with Art. 13(1)(e) of Directive (EU) 2016/679 – General Data Protection Regulation (GDPR) (Status as of: March 2020)

The processing of your personal data is essential for the justification, management, fulfilment and termination of an insurance contract. Due to the high complexity of the insurance industry and the legal framework conditions, it may be necessary for your data to be transmitted to a wide range of recipients. Below you will find more information about the recipients or categories of recipients to whom we may transfer your personal data.

Of course, any transfer will only take place if this is necessary for contractual fulfilment or there is a legal obligation required to fulfil an overriding legitimate interest on our part or that of a third party, or you have issued your consent for this.

In all such cases, your personal data will only be transferred or provided to the absolute minimum extent required, and under no circumstances will all existing data be transferred or provided, but rather only those which are required to fulfil the special purpose.

Depending on the individual case, your personal data may be transferred to the following third parties in particular in this context:

### **Processors from the VIENNA INSURANCE GROUP**

One of our basic principles lies in either completing essential data processing for our business ourselves or having this performed by specialised companies within our corporation in Austria. This refers to the following companies, which, in terms of data protection law, should be regarded as processors as defined in Art. 4 (8) GDPR and with which we have concluded agreements in accordance with Art. 28 GDPR:

#### twinformatics GmbH, Obere Donaustraße 63, 1020 Vienna

twinformatics GmbH is our IT service provider. The main tasks performed by twinformatics GmbH are the development of software as well as the operation and maintenance of our IT systems. twinformatics GmbH is certified in accordance with ISO 27001:2013, guaranteeing maximum security and data protection. All of our data centres are located in Austria.

#### serviceline contact center dienstleistungs-gmbh, Schottenring 30, 1010 Vienna

serviceline contact center dienstleistungs-gmbh operates our call centre in Vienna. It is responsible for all-round servicing for our existing customers as well as potential new customers via a range of communication channels (mainly via telephone, email and online chat).

#### EXPERTA Schadensregulierungs GmbH, Obere Donaustraße 49-51, 1020 Vienna

We contract EXPERTA Schadensregulierungs GmbH mainly with the survey and inspection of damage to vehicles, including web-based processes in the context of contract management (risk assessment, data transfer to parties involved as part of claims processing, commissioning of inspections).

#### Sparkassen-Versicherungsservice Gesellschaft m.b.H, Wipplingerstr. 36-38, 1010 Vienna

Sparkassen-Versicherungsservice Gesellschaft m.b.H supports us and the companies of the Erste Bank and Sparkassen Group with advising customers about standard insurance products and complex insurance solutions.

### **Processing by specialised service providers outside our corporation**

However, due to the complex nature of modern data processing, we also have to use specialised service providers outside our corporation for different purposes, and commission them with the processing of your data.

As part of processing outside our corporation, we select our partners carefully. They have an obligation towards us to treat your data confidentially and to observe our in-house data protection standards in accordance with the legal provisions of Art. 28 GDPR. In particular, our partners are obliged to only process your data in the context of service provision. Under no circumstances are they permitted to transfer your data to third parties for advertising purposes or to use it themselves for commercial purposes. We require that our processors contractually oblige all parties with access authorisation to maintain confidentiality.

These may be the following categories of companies:

- **Scanning and printing service providers**

We use these kinds of companies for the professional scanning of documents and printing of our postal items or customer magazine.

- **Assistance service providers** that organise emergency, assistance, problem-solving and service provisions for you (such as breakdown assistance, locksmith service, plumbing services, assistance following a break-in, search and rescue services, as well as patient transportation, interpreting and substitute accommodation).
- **Market research institutes** that perform market analyses or surveys on the behaviour, needs, attitudes, opinions, motivation, etc. of participants on our behalf.
- **Service providers of SMS services** if you use this service (e.g. SMS weather warning).
- **Service companies for controlling cooperation partners** such as hotels, fitness centres, doctors, trainers and coaches when a corresponding voucher is redeemed from our private health insurance.
- **Security service providers** within the context of safeguarding building and data security.

The Austrian insurance industry uses the **Association of Insurance Companies (VVO)**, Schwarzenbergplatz 7, 1030 Vienna, as a processor under data protection law for the operation of several central services. The following technical services are operated by the VVO and are used by the insurance companies as a data controller under data protection law.

- "LET investment fund database" for the purpose of automated data exchange between insurance companies and financial institutions concerning life insurance used for collateral purposes. The financial institution requests the contractual data of these life insurance policies from the VVO to ensure their intrinsic value and proper use (in accordance with Section 39 of the Austrian Banking Act [BWG]); the data are provided in electronic form via the data hub.
- Co-insurance settlement (in accordance with Section 5(48) of the Austrian Insurance Supervision Act [VAG]) for the purpose of standardised data transfer between insurance companies to implement mutual balance settlement with co-insurance policies.
- Use of the FTAPI SecuTransfer software as hosted software in the VVO data centre for secure and encrypted data exchange in the context of insurance relationships.
- Organisational arbitration body for the negotiation of disputes regarding cost allocation as part of direct settlement contracts (in accordance with Section 11c VersVG).

The following technical services are operated by the VVO as a processor under the joint responsibility of the participating insurance companies according to data protection regulations:

- Central information system of the Austrian insurance industry in health and life insurance for the examination of insurance risks as part of claims or insurance events. To this end, in the event of a permanent or temporary rejection of an insurance application, the potential acceptance of the application under difficult conditions, the conclusion of occupational disability insurance with pension cover for an annual pension insured for more than EUR 9,000 and the premature termination of the contract due to a breach of the notification obligation of the policyholder or applicant, a registration may be made in the system (registered information association system according to Section 50 of the Austrian Data Protection Act [DSG] 2000 in connection with Section 69(9) DSG 2018).
- Bonus/penalty information system for retrieving premium classification in motor third party liability insurance. Premium level data from motor third party liability insurance contracts are reported by the responsible insurance company if the insurance has been concluded without a subsequent contract and the bonus/penalty system has been applied to the insurance contract. The premium level data can be obtained from the subsequent insurer (in accordance with Art. 6(1)(f) GDPR) and the classification taken as a basis in the bonus/penalty system.
- Evidence of motor vehicle registration to fulfil the legal obligation relating to motor vehicle registration in accordance with Sections 47 and 61 of the Austrian Traffic Act [KFG] and Section 4(3)(9) of the Austrian Insurance Tax Act [VersStG]. Each responsible insurance company is authorised or obligated to save data to the information system or to retrieve data from this system.

#### **Data transfer to independent data controller**

The following recipients do not focus on data processing; this is therefore not processing within the meaning of data protection law, but the **use of external specialist services** with an independent controller or the required data transfer to an independent controller. We may or must transfer your personal data to the following categories of recipients in certain cases:

- **Insurance intermediaries:** If your insurance relationship with us is concluded through an agent or broker and/or an agent or broker maintains your insurance contract, the insurance intermediary will collect your personal data and transfer to us the data necessary for examining your insurance risk or fulfilling the respective contract. We will also transfer your personal data to the intermediary to the extent necessary to provide support based on and within the scope of the power of representation granted to the intermediary.
- For claims settlement, it may also be necessary to transfer your data to **other insurance companies involved in an insurance event** (e.g. with motor claims).
- **Co-insurers:** Several insurance companies may be involved in insuring the same risk, primarily with the coverage of major risks. In such cases, it may be necessary to transfer your contract and claim data to these companies in accordance with Section 11c(1)(2) VersVG so that the participating insurers can evaluate the assumed risks and ensure the fulfilment of the claims.
- **Reinsurers, retrocessionaires:** Where necessary, we insure the risks we have assumed with special insurance companies (reinsurers). It may therefore be necessary to send your contract and claim data to these companies in accordance with Section 11c(1)(2) VersVG so that the reinsurer can perform an independent assessment of the risk or insurance event.
- **Occupational pension funds, retirement funds:** In the context of contracts of occupational group insurance.
- In certain cases, we may transfer your personal data to companies (e.g. workshops) contracted with **claims settlement and claims processing**.
- **Participants in claims or insurance events:** Insofar as this is legally covered and absolutely necessary as part of our claims processing or to render a service, we may also transfer your data to participants such as beneficiaries, injuring parties and injured parties in a claim or insurance event, depending on the individual case.
- **Experts**, as far as this is necessary for the assessment of insurance events.
- **Forensics service providers** for the performance of necessary forensic analyses.
- Based on Section 11c VersVG, we may, for example, to examine risks or to assess insurance events, transfer your personal health data to **health service providers** such as doctors and medical institutions, social insurance agencies, reinsurers, co-insurers and other insurers involved in the settlement of the insured event, as well as authorised experts.
- **Rehabilitation centres or pharmacies** in the course of direct invoicing.
- **Legal and arbitrary representatives:** e.g. parents of a minor, adult representatives or persons authorised by power of representation. In such cases, we will only transfer your personal data within the scope of the power of representation.
- **Service providers** for the provision of contractually owed insurance services (e.g. breakdown assistance, locksmith service, plumbing services, assistance following a break-in, search and rescue services, patient transportation, interpreters).
- **Creditors, persons owed through restricted transferability and mortgage creditors** in the event that the insurance contract is safeguarded according to your contractual agreement.
- **Banks and financial institutions** to carry out payment transactions (e.g. for tracking, cancellation or correction of incorrectly made payments).
- **Collection offices and service providers as part of combating fraud** (e.g. detective agencies) for enforcing our legitimate claims.
- **Solicitors** to establish or defend legal claims.
- **Various chambers** such as the Bar Association, the Medical Chamber and Austrian Economic Chamber to communicate the confirmation of insurance for concluding mandatory insurance contracts.

- **Logistics service providers** for the dispatch of postal items.
- **Dispute resolution bodies (interest groups, arbitration bodies):** Your data may be transferred to an out-of-court dispute resolution body based on your (contractual) consent or a legal obligation.

Your personal data may be transferred to the following recipients as the result of a **legal obligation**:

- If there is a **legal or regulatory obligation** for this purpose, your personal data may be transferred to public bodies and institutions (e.g. European insurance regulator, Austrian Financial Market Authority, domestic and foreign financial authorities, etc.) as well as the VIENNA INSURANCE GROUP AG as our parent company.
- **Courts and public prosecutor's office:** There are legal obligations that can only be fulfilled by WIENER STÄDTISCHE if we transfer your personal data to courts and/or the public prosecutor's office, whereby this shall only take place to the minimum extent required and within the legally binding framework.
- **Court commissioner (notary):** As part of the settlement of an estate.
- **Insolvency administrator:** As part of their court-appointed activity.
- **Financial authorities:** In accordance with Section 114 in connection with Section 143 of the Federal Fiscal Code (BAO) or within the scope of state subsidies (e.g. pension plans with subsidised premiums).
- **Auditor:** As part of the process of drawing up our annual financial statements.
- **Other public authorities and other public sector companies:** Due to legal obligations, we may have to transfer your personal data to recipients other than those explicitly named in this document. In this case, the data shall only be transferred to the minimum extent required and within the legally binding framework.

#### **Data transfer to a third country or to an international organisation**

Data shall only be transferred to countries outside the EU or the EEC (known as third countries) if this is required to execute your orders (e.g. payment orders), if this is legally stipulated (e.g. fiscal reporting requirements such as GSMG or FATCA) or if you have consented to this.

At your request, for contracts containing a foreign element or for an insurance event that is abroad or contains a foreign element, data transfer to third countries may be necessary for contractual fulfilment. The transfer may concern the categories of recipients listed for domestic purposes, but also **cost containment companies**, which review invoices and insurance events from abroad for their accuracy and necessity as well as settle invoicing with foreign health providers.

In the context of data processing, your data shall not be transferred outside the European Union – apart from in the exceptions specified above.

#### **Adaptation of this information**

This information replaces all previous versions. We reserve the right to adapt it if necessary.