



Privacy Policy for insurance contracts and proposals

1. Who is responsible for handling your data within the meaning of the GDPR?

- 1.1. UNIQA Österreich Versicherungen AG, Untere Donaustraße 21, 1029 Vienna, telephone: +43 50677 670, email address: info@uniqa.at ("UNIQA", "we", "us") is responsible for processing your data. The protection of your personal data is very important to us. We therefore comply with the applicable legal provisions on the protection, lawful handling and confidentiality of personal data, as well as on data security.
- 1.2. We process your personal data as required by the General Data Protection Regulation (GDPR), the Data Protection Act (DSG), the special provisions of the Insurance Contract Act (VersVG), the Insurance Supervision Act (VAG 2016) and all other relevant laws.
- 1.3. You are welcome to contact our data protection officer at datenschutz@uniqa.at.

2. For what purpose and on what legal basis may UNIQA process your data?

- 2.1. **Contract fulfilment and implementation of pre-contractual measures:** We use your personal data in accordance with Art. 6 (1) (b) GDPR and the applicable special provisions for the processing of special categories of personal data (such as, in particular, your health data) in accordance with Art. 9 (2) (g) and (h) and (4) GDPR in conjunction with Sections 11a ff VersVG.

- to assess the risk we are taking on
- to assess whether and under what conditions the insurance contract can be concluded or a contract amendment can be made, and to prepare and process the proposal or insurance offer (hereinafter referred to as the "proposal")
- to process proposals and applications
- to draw up contracts
- once an insurance contract is in place, for its implementation, fulfilment (including premium collection and processing of SEPA direct debit mandates), amendment, administration, invoicing, claims processing, claims assessment and recourse, providing information in connection with the processing of benefits and checking whether you are entitled to benefits, as well as termination
- for ongoing customer support and information provision, as well as in the context of complaint management
- for the administration of master data and contract data changes
- for fund management in the case of fund-linked products

- for the administration of the registration business as an authorised registration or notification office for the registration and deregistration of motor vehicles.

The preparation and processing of a proposal, as well as the conclusion and fulfilment of the respective insurance contract, are only possible if we are able to process your personal data. If you do not provide us with the necessary data, no insurance contract can be concluded. In order to protect the insured community from insurance fraud and to maintain premium equivalence, UNIQA may access potentially existing health data.

2.2 Your data may also be processed in the interests of UNIQA or a third party.

In particular, in accordance with Art. 6 (1) (f) GDPR for:

- Risk assessment, compensation for the risks we take on and ensuring that your claims are met
- customer service and complaint management
- Creation of statistics and models as well as analysis of customer data, in particular for the development of new products and tariffs, customer service, processing of proposals and applications, contract management, process improvement (quality management and improvement of data quality) and service provision as well as risk minimisation
- Evaluations and projections that allow us to identify correlations and statistical relationships, such as calculations of the probability of future claims or customer interests
- In certain cases (especially in the context of fraud suspicion checks), we reserve the right to obtain credit information from specialised credit agencies (CRIF GmbH, Kreditschutzverband KSV 1870). This serves to prevent fraud and minimise risks in order to protect the insured community
- We process personal data that we have not collected directly from you, but have received from third parties (e.g. publicly available sources, service providers (Statistik Austria)). This data is used to improve our data quality and for targeted customer segmentation.
- Continuous improvement of our processes to ensure high quality advice and support in the long term
- The development and improvement of our AI systems and models for internal use. This includes the preparation of data, the initial and ongoing training of models, and the use of AI in our processes. The AI systems are used for process improvements, productivity increases and user support, for example in AI-supported processing in the area of insurance contract and

claims handling, AI-supported extraction and classification of information from documents, or for chatbots. This is not only in the interest of UNIQA, but also in the interest of the data subject, whose enquiries and applications can thus be processed more quickly. The ongoing development of AI models and the updating of training data also serve to increase the reliability of AI models.

- Risk assessment in the event of a claim, to clarify the facts when assessing benefits, in recourse processing and enforcement, and in combating insurance fraud. To fulfil these purposes in the life insurance sector, UNIQA may exchange your personal data in the LET repayment vehicle database and the Central Information System of the Insurance Industry (ZIS). In connection with motor vehicle liability insurance contracts, UNIQA checks information in the bonus-malus data exchange platform, which is used as the basis for classification in the bonus-malus system. For more information on the information systems maintained by the Association of Insurance Companies, please refer to section 3.7 of this document.
- the purpose of "compliance". This refers to compliance with legal and other requirements, such as income tax and social security deductions, recording/reporting obligations, audits, compliance with government/authority reviews, response to legal proceedings, pursuit of legal rights/remedies, management of internal complaints/claims, investigations and compliant behaviour with strategies/procedures.
- Processing of your personal data in the context of asserting and defending legal claims (in particular judicial and extrajudicial disputes and fulfilment of data subject rights).
- Recording your signature characteristics where necessary (in particular in the case of electronic signatures) and depositing them with a notary who is legally bound to secrecy for the purpose of asserting, exercising or defending legal claims.
- Measures for the purpose of combating fraud to prevent and investigate criminal offences. This is done in the interests and for the protection of the insured community and to maintain the trust of our customers. UNIQA uses data analysis in particular to identify indications of insurance fraud.
- Satisfaction surveys among existing customers to ensure high service quality.
- Direct marketing – we have established some product- or service-specific marketing measures that lead to us contacting you, for example to inform you about new products and services, competitions, events or company initiatives. In the context of direct marketing, certain criteria, such as existing insurance rates, age or demographic aspects, are used to preselect the relevant customers for targeted, relevant communication, target group and product selection, and to take into

account the tariff specifications and contractual framework conditions of the respective product. If, as a result of a balancing of interests, the respective direct marketing activities cannot be considered processing that serves a legitimate interest, or if such contact within the meaning of the Telecommunications Act requires consent in the case of electronic mail or telephone calls, we will only use your data for these purposes with your voluntary consent, which can be revoked at any time.

- Planning, implementation and documentation of internal audits and forensic analyses to ensure the continuous improvement of our business processes and to fulfil regulatory obligations
- Ensuring IT security and IT operations, performing stress tests, developing new products and systems and adapting existing ones, migrating data to ensure the viability and integrity of the systems and, in a broader sense, the processed data. The personal data provided is primarily used for testing purposes where this cannot be done at reasonable economic cost on the basis of anonymous data, whereby data security is of course guaranteed at all times in accordance with Art. 32 GDPR.

2.3 Fulfilment of legal obligations: UNIQA processes your personal data in accordance with Art. 6 (1) (c) GDPR for the fulfilment of legal obligations and in accordance with Art. 6 (1) (e) GDPR for the performance of a task carried out in the public interest. The processing of your data takes place exclusively to the extent required by the respective law. We primarily process personal master data, contract data, billing and payment data.

Our legal obligations include in particular:

- supervisory and insurance law requirements (in particular the Insurance Supervision Act (VAG) and the Insurance Contract Act (VersVG), which stipulate, for example, advisory obligations, information obligations and reporting obligations for UNIQA);
- corporate and tax law requirements (e.g. retention obligations);
- sanctions obligations (e.g. comparison of customer data with sanctions lists);
- Requirements for the administration of the motor vehicle registration business as an authorised insurer within the meaning of the KFG Registration Office Ordinance (e.g. registration and deregistration of a motor vehicle);
- in the life insurance sector - reporting obligations to tax authorities based on the Joint Reporting Standard Act (GMSG) and the State Treaty with the USA on the Foreign Account Tax Compliance Act (FATCA);
- Due diligence obligations to prevent money laundering and terrorist financing in accordance with the

Financial Market Money Laundering Act (FM-GwG);
- Compliance with proper business operations – in addition to compliance with national legal and other requirements (as mentioned above), this also includes recording/reporting obligations, internal audits, compliance with reviews by authorities and the management of internal complaints/claims.

UNIQA has set up a whistleblowing platform to comply with the legal obligations under the Whistleblower Protection Act (HSchG) and to promote a transparent corporate culture. The whistleblowing platform serves to uncover and prevent abuses that could harm the company or the general public. Personal data is processed exclusively for the purpose of investigating reports of misconduct and taking appropriate action. In accordance with the Whistleblower Protection Act, UNIQA Insurance Group AG and UNIQA Österreich Versicherungen AG share joint responsibility for the operation of the UNIQA whistleblowing platform and for central case processing in accordance with Art. 26 GDPR. You can assert your rights in accordance with Art. 15 ff GDPR against each individual controller, i.e. both UNIQA Insurance Group AG and UNIQA Österreich Versicherungen AG, unless these do not apply in accordance with § 8 (9) HSchG.

2.4 **Consent:** We obtain your consent in accordance with Art. 6 (1) (a) GDPR, provided that none of the justifications set out in points 2.1 to 2.3 above apply. In doing so, we will of course fully comply with any additional regulations (including the Telecommunications Act). UNIQA requires your voluntary consent, which can be revoked at any time, primarily for electronic or telephone contact for direct marketing purposes within the meaning of the Telecommunications Act, any recording of telephone conversations or when obtaining your health data from third parties such as doctors or hospitals in accordance with Sections 11a to 11d of the Insurance Contract Act (VersVG) to the extent necessary for the conclusion or amendment of a contract and the provision of services.

2.5 If UNIQA processes your data for purposes other than those described in this document, we will inform you separately.

3. To whom may your data be passed on and from whom do we receive it?

3.1. Recipients in accordance with Section 11c of the Insurance Contract Act (VersVG): Unless express consent has been given for the individual transfer in accordance with Section 11a (2) no. 3, UNIQA may only transfer your health data for the purposes specified in Section 11a (1) (conclusion of contract, amendment of contract, contract administration and contract fulfilment) to the following recipients:

- Healthcare providers (Section 11a (2) no. 4),
- social security institutions, reinsurers or co-insurers,
- other insurers involved in the settlement of claims arising from an insured event,
- authorised experts engaged by the insurer,
- arbitrary or legal representatives of the person concerned,
- courts, public prosecutors, administrative authorities, arbitration boards and other dispute resolution bodies and their organs, including the experts appointed by them.

3.2. **Reinsurers:** We insure the risks we assume with special insurance companies (reinsurers) where necessary. In some cases, these reinsurers use other reinsurers to further balance their risks. To do this, it may be necessary to send your contract and claim data to them in accordance with Section 11c (1) no. 2 of the Austrian Insurance Contract Act (VersVG). This is necessary so that the reinsurer can independently assess the risk or, the insurance claim. It is also possible that the reinsurer may support us in the evaluation of procedural processes due to its special expertise. Within the scope of their reinsurance activities, reinsurers are responsible for their own data processing. We only pass on your personal data if this is necessary and proportionate for the fulfilment of your contract or to safeguard our legitimate interests. In personal insurance, health data may also be transferred to the reinsurer on the basis of a legal authorisation (Art. 9 (2) (g) GDPR in conjunction with § 11c (1) no. 2 and § 11a (1) VersVG).

3.3. **Insurance intermediaries:** If your insurance relationship with UNIQA is concluded through an insurance agent or an insurance broker and advisor, and/or if an insurance agent or broker and advisor manages your insurance contract with UNIQA, the insurance intermediary will collect your personal data and forward it to us for the purpose of assessing your insurance risk for the conclusion or fulfilment of the respective contract. We also transfer your personal data to the intermediary to the extent necessary for your support.

3.4. **Data transfer within the UNIQA Group:** We may pass on individual data processing operations to companies within our group. This is done within the scope of the purposes and legal bases defined above. A list of the companies belonging to the UNIQA Group can be found at www.uniqagroup.com in the current UNIQA Group Report.

3.5. **External service providers:** We comply with legal and contractual obligations. To this end, we work with external service providers (processors) and transfer your personal data to them to the extent necessary for

the preparation and processing of the proposal and for the provision of services. Our processors include, in particular, IT service providers, companies involved in the preparation and processing of the proposal, service providers involved in customer care, contract management and claims settlement, market research institutes, advertising agencies and waste disposal companies that dispose of our business documents in accordance with data protection regulations.

3.6. **Courts and authorities:** There are also legal obligations that UNIQA can only fulfil if we transfer your personal data to authorities (such as social security institutions, tax authorities or law enforcement agencies) or to courts within the scope of their judicial activities to the extent necessary.

3.7. The **Association of Austrian Insurance Companies (VVO)**, Schwarzenbergplatz 7, 1030 Vienna, operates the following systems as a processor, which UNIQA uses as one of the participating insurance companies for the purposes set out:

- Motor vehicle registration records (legal basis: Art. 6 (1) (c) GDPR) – as part of its motor vehicle liability insurance operations, UNIQA is obliged to participate in the motor vehicle registration records. In connection with the notification of the existence or non-existence of motor vehicle liability insurance cover, data relating to registration holders (e.g. name, date of birth, motor vehicle liability insurance data, vehicle data) is processed in the central registration records of the joint institution of insurance companies authorised to operate motor vehicle liability insurance.

LET repayment vehicle database (legal basis: Art. 6 (1) (f) GDPR) – used for the automated exchange of data between insurance companies and credit institutions on life insurance policies used to secure loans. Each participating insurance company reports life insurance contracts that are used to secure loans. Authorised credit institutions have access to those policies that serve to secure the loans they have granted.

- Co-insurance settlement (legal basis: Art. 6 (1) (b) GDPR) – participating insurance companies exchange the premium and claims information necessary for the settlement of existing co-insurance on a bilateral basis within the framework of a standardised data transfer.

- Bonus-malus system (legal basis: Art. 6 (1) (f) GDPR) – this data exchange platform enables classification within the bonus-malus system for motor vehicle liability insurance contracts. Data on the premium level from motor vehicle liability insurance contracts is reported to the platform by motor vehicle insurance companies if the insurance is terminated without a follow-up contract and the bonus-malus system has been applied to the insurance contract. The data on the premium level can be retrieved by the successor insurer

and used as the basis for classification in the bonus-malus system. This ensures correct classification in the bonus-malus system in accordance with the previous claims history.

Central information system in life insurance "ZIS" (legal basis: Art. 6 (1) (f) GDPR) – serves to protect the insured community from insurance fraud and to maintain premium equivalence. If an insurance application is rejected, accepted under more difficult conditions, an insurance contract is terminated due to a breach of the pre-contractual duty of disclosure, or occupational disability insurance is taken out (insured annual pension > EUR 9,000), the insured person / person to be insured can be entered into the system once the signed application has been submitted. An existing system entry can be queried by the participating insurance companies.

- Health insurance arbitration board (legal basis: Art. 6 (1) (b) in conjunction with Art. 9 (2) (f), (g), (h) GDPR, Sections 11b and 11c VersVG) – agreements exist between Austrian health insurance companies and hospital operators or medical associations on the establishment of an arbitration board. In accordance with the arbitration rules, this body is responsible for negotiating and deciding on disputes concerning direct billing claims under health insurance (§ 11b VersVG). The basis for this is direct billing agreements between health insurance companies and their contractual partners (hospital operators and medical associations) as well as the concept of arbitration recognised by the legislator (Section 11c (1) no. 6 VersVG). The transmission of documents relating to benefit claims to the arbitration board serves to defend legal claims in the context of benefit processing. The VVO coordinates the negotiations on the basis of and in application of the arbitration rules. In this context, the VVO, as a processor, receives documents containing personal data (including health data).

- Data exchange platform - FTAPI (legal basis: Art. 6 (1) (b) in conjunction with Art. 9 (2) (f), (g), (h) GDPR, Sections 11a and 11c VersVG, and Art. 6 (1) (f) GDPR) – used for the secure and encrypted receipt and transmission of documents. The VVO provides the FTAPI SecuTransfer software as hosted software in its data centre, takes care of software maintenance and support, and provides user support. This platform is used by UNIQA for secure data exchange with experts and lawyers.

In the case of the Health Insurance Arbitration Board, the ZIS, the bonus-malus information service and the motor vehicle registration database, the insurance companies are considered joint controllers and have concluded an agreement on joint data processing in accordance with Art. 26 GDPR. You can assert your rights under Art. 15 ff GDPR against each individual controller, i.e. both UNIQA Österreich Versicherungen

AG and the other participating insurance companies.

- 3.8. In the case of damage assessment in motor vehicle insurance, there is joint responsibility between UNIQA and other insurance companies, and the insurance companies have concluded an agreement in accordance with Art. 26 GDPR. The joint controllers operate a database managed by DAT Austria GmbH as a processor for the purpose of motor vehicle-related documentation of accident damage for the preparation of expert reports in the event of an insurance claim. The accident documentation is assigned to the respective motor vehicle on the basis of the Vehicle Identification Number (VIN). No other personal data of the vehicle owner is stored. You can assert your rights in accordance with Art. 15 ff GDPR against each individual controller, i.e. both UNIQA and the other participating insurance companies.
- 3.9. **Credit reports:** UNIQA may transfer your personal data to specialised credit agencies (e.g. CRIF GmbH, Kreditschutzverband KSV 1870) for the purpose of obtaining and updating credit reports. The credit agencies act as independent controllers and process the transferred data for their own purposes as credit agencies and address publishers. Further information can be found at www.crif.at/datenschutz and www.ksv.at/datenschutzerklaerung.
- 3.10. **Other recipients:** In the course of preparing and processing the proposal, the contractual relationship, asserting, exercising and defending legal claims and, in particular, in connection with our performance obligation, further transfers of your personal data may occur, depending on the individual case (such as to doctors, hospitals, co-insurers, experts, assessors, solicitors and notaries, interest groups, companies involved in the settlement of claims, credit institutions, financial service providers and investment companies, postal and courier services and logistics partners, creditors, in the event of a contract being secured, partner companies offering services in connection with insurance products, such as severe weather warnings, VitalPlan Vorsorge and Fitness, if you use these services, auditors).

An overview of recipients (third parties as well as service providers employed by us as processors) can be found at www.uniqa.at in the "Data protection" section.

4. Can your data also be transferred to another country (including outside the EU)?

- 4.1. Yes, if the European Commission has confirmed that this third country has an adequate level of data protection or if other suitable data protection guarantees are in place (e.g. binding internal company data protection

regulations or EU standard data protection clauses). Detailed information on this and how you can obtain a copy of the appropriate safeguards can be found at www.uniqa.at in the "Data Protection" section. You are also welcome to request this information to be sent to you at the above contact address.

5. How long will your data be stored?

- 5.1 As soon as UNIQA no longer needs your personal data for the purposes described above, it will delete it, provided that no further statutory retention periods apply.
- 5.2 If an insurance contract is not concluded, the data will be stored for a maximum of three years. This storage serves, on the one hand, to prove compliance with regulatory information and advisory obligations (Sections 130 to 133 and Sections 135a to 135c VAG 2016) and, on the other hand, to fulfil or defend legal claims.
- 5.3 We process data during the term of the contractual relationship for the purpose of fulfilling the contract (e.g. data on the insured risk, claims and benefits processing, benefits history, calculated premium amount and scope of cover) and also after the contractual relationship has ended. Due to corporate law requirements, your contract data must be stored for at least seven years after the end of the contract (Section 212 UGB, Section 132 BAO). In accordance with the Insurance Contract Act (in particular Section 12 VersVG), we generally retain the data for ten years after the end of the contract (period during which claims can be made against us). Settlements of claims and benefits after termination of the insurance contract lead to an extension of the retention periods to be observed by ten years from the date of settlement, as the limitation period of Section 12 VersVG begins to run again in this regard. Furthermore, in certain circumstances (e.g. in liability insurance, legal expenses insurance and in the case of claims under the law of unjust enrichment), claims against us may be asserted for up to thirty years after the end of the contract or even longer, in accordance with current case law or in the case of contractually agreed unlimited extended liability or extended cover. In these cases, we therefore retain the data from the underlying insurance contract for thirty years or indefinitely.

6. What are your rights?

- 6.1. If you wish, we will provide you with information about your personal data that we process at any time. In addition, in some cases you also have the right to data portability and thus to the disclosure of your personal data provided to us in a structured, commonly used and machine-readable format.

6.2. Under certain conditions, you can request the restriction of processing as well as the correction and deletion of your personal data.

6.3. In some of the above cases, UNIQA is entitled to process your personal data with your consent. You can revoke your consent at any time without giving reasons with effect for the future; until then, we will continue to process your data lawfully.

6.4. Would you like to make a complaint? In this case, you can contact the data protection officer mentioned in section 1.3. You also have the option of lodging a complaint with the Austrian Data Protection Authority: Österreichische Datenschutzbehörde, Barichgasse 40-42, 1030 Vienna.

7. Your right to object

7.1 As a data subject, you may object to the use of your data at any time if the processing is for direct marketing purposes.

If we process your data in the interests of UNIQA or a third party, you also have the right to object at any time if there are reasons for doing so arising from your particular situation.