

Privacy notice (last updated May 2018)

As an insurance agent, we are well aware of just how important your personal data are. The controller responsible for processing your personal data is:

Vienna International Underwriters GmbH
Schottenring 30, 1010 Wien
Tel: +43 (0)50 390-26111, e-mail: viu@viunderwriters.com

You will find detailed information on the ways in which we process your data below. If you have any concerns or questions about the processing of your data by our company, please contact our data protection officer at datenschutz@vig.com.

Your insurance contract

- Personal data

Processing your personal data is essential for concluding the insurance contract with you. We require these data to assess whether an insurance contract can be concluded and on what terms, and to determine the amount payable if a claim you submit is approved. We also use your personal data in order to provide other services, such as informing you of legal changes, where they affect your insurance contract. "Personal data" refers to any kind of information that relates directly or indirectly to a natural person (such as name, address and contract details). Although this means that business or trade secrets are not strictly regarded as personal data, we give such information the same level of protection, and we expect our business partners and customers to do likewise.

- Scope of data use

If you submit an insurance application, you provide us with personal data and, where necessary, business and trade secrets relating to you, your relatives and dependants, employees and other third parties. In all such cases, we assume that you are entitled to provide such data. We use your data and data concerning third parties specified by you in our legitimate interest as a data controller and to the extent necessary for the proper conclusion and administration of the insurance contract. Based on any declarations of consent that you provide separately, we also use your data to send you offers for additional products supplied by us, other companies in our Group or our business partners. It is necessary that we process special categories of personal data in connection with some of our insurance products. These data mainly include information on your health, which we require in order to conclude a health, life or accident insurance contract and process any claims. We process such data in compliance with the *Versicherungsvertragsgesetz* (Austrian Insurance Contract Act), and based on the consent you gave in your insurance application.

- Transmission of data to third parties

Owing to the complexity of modern-day data processing procedures, from time to time it is necessary that we commission external service providers to process your data. Some of these service providers are based outside the EU. Whenever we commission third parties, we always ensure that they meet European data protection and data security standards. In the course of processing transactions, it may be necessary that we transfer your data or process it jointly within the company or the Group. We ensure that European data protection standards are also met in these cases. If you would like further details on the ways in which we process personal data in your specific case or transmit your data to service providers, and to what extent, as well as the protective measures we take, please contact us at datenschutz@vig.com.

- Use of cloud-based services

As an innovative and forward-looking company, we make use of cloud-based services. The cloud-based services we use are provided by:

- Microsoft Corp.
- Google Inc.

We mainly use such services in connection with internal and external electronic communication, as well as for video conferencing, managing appointments, and shared document use in the course of internal collaboration. Data related to your insurance contract, in particular your health-related data, are not stored by means of such cloud-based services, but at our data centers.

- Cooperation with reinsurers

In order to provide coverage against particular types of risk, we work closely with our reinsurers, who assist us with assessing risks and claims. For this purpose, it is necessary that we share your personal data and data related to your

insurance contract with our reinsurers. These data are exchanged solely for the purpose of jointly assessing insurance risk and claims in your specific case, in compliance with the framework set out in the Austrian Insurance Contract Act.

- Cooperation with insurance brokers

If you use an insurance broker, he or she will collect and process your personal data and transmit them to us in order for us to evaluate your insurance risk, conclude the insurance contract or assess a claim. We also transmit personal and insurance-contract-related data to your insurance broker to the extent necessary for the broker to provide services to you. Your insurance broker is responsible for ensuring that your personal data are used in conformity with data protection regulations, so we always take the utmost care when selecting the brokers with which we collaborate.

- Transmission of data to regulatory authorities, courts and other third parties

As an insurance company, we are subject to strict regulatory requirements and ongoing official supervision. This means that we may be obliged to disclose policyholders' personal data to public authorities or courts at their request. When assessing your claim, we may have to consult third parties such as doctors, hospitals, experts or companies commissioned in connection with loss adjustment and transmit your personal data to them. In all such cases, we always ensure compliance with statutory requirements, in order to guarantee protection of your data.

- Automated data processing procedures

In order to maximise efficiency when it comes to processing transactions, we sometimes use automated assessment programs to determine insurance risk based on the details provided in your insurance application, as well as the level of your premiums and any excluded risks. In some cases, such programs are also used to automatically determine our liabilities if we are obliged to pay a claim. The parameters used in these programs are based on empirical actuarial values, which ensure objective assessment criteria. You are entitled to reject the use of such automated procedures in connection with you and your transactions and instead demand manual processing of all business by Group employees. In this case, please ask your adviser to forward your request to the relevant department for evaluation. Alternatively, you can submit your request by e-mail to info@vig.com. Please note that manual processing of your transactions can sometimes lead to delays.

Data security at VIG

As a subsidiary of a licensed insurer, encryption of all data traffic within the company is a given. We also have means of encrypting external data traffic, provided that you as the recipient of our communication have access to the necessary decryption technology. Please note that electronic communication by means of standard e-mail programs such as MS Exchange does not provide full protection against third-party access and that servers located outside Europe may be used for such communication.

Ensuring that the Group's data centres meet all of the security requirements of the ISO 27001 standard is likewise a matter of course. Our security philosophy also extends to the service providers we commission, and they are obliged to comply with the same types of, and equally strict security precautions. Where data are stored on servers outside Europe as part of our use of cloud-based services, we take steps to ensure that data are stored in fragmented or encrypted form, using state-of-the-art encryption technologies. Data on your insurance contract and your health are always stored at our internal data centres. If you have any questions on data security measures specifically related to your dealings with us, please write to datenschutz@vig.com.

Your rights

You can demand information on the origins, categories, duration of storage, recipients and purpose of the data we process in connection with you and your dealings with us, and the form such processing takes.

If we process personal data that are inaccurate or incomplete, you can demand rectification or completion of the data. You can also demand that unlawfully processed data be erased. Please note that this only applies to inaccurate, incomplete and unlawfully processed data. If it is unclear whether your processed personal data are inaccurate or incomplete, or have been unlawfully processed, you can demand that processing of your data be restricted until the matter is finally clarified. Please note that these rights are mutually complementary, meaning that you can only demand either the rectification or completion, or the erasure of your data.

If your personal data are accurate and complete and are being lawfully processed by us, you can submit a reasoned objection to processing of the data in certain cases. You can also submit an objection if you receive direct advertising from us and no longer wish to receive it in future.

You can request details of the personal data we process, provided that you supplied the data, in a machine-readable format to be determined by us, or request us to forward such details to a third party selected by you, provided the recipient has the necessary technology that enables us to do so, and transmission does not involve unreasonable expense and is not contrary to statutory or other duties of confidentiality, or confidentiality requirements on our part or on the part of third parties.

In all matters, we request that you use the contact details provided below and supply proof of your identity, for instance by sending a copy of a form of ID.

Although we make every effort to ensure the protection and integrity of your data, differences of opinion may still arise regarding the ways in which we use your data. If you believe that we are using your data in a prohibited manner, you are entitled to lodge a complaint with the Austrian Data Protection Authority.

Storage of your data

We store your data for the duration of our insurance relationship with you. We are subject to various other storage obligations, under which we must retain your personal data, as well as data concerning third parties (such as any dependants covered by a policy), your claims and your contract following termination of the contract or settlement of a claim, for instance in accordance with the periods specified under commercial law. We additionally store your data for as long as any legal claims arising from our insurance contract may be asserted.

Why processing your data is necessary

The provision of personal data and, where applicable, data concerning third parties specified by you, is essential for assessing insurance risk, concluding the insurance contract and settling your claims. If you do not provide such data, or do not provide data to the required extent, this could mean that we are not in a position to conclude the insurance contract you have requested or to settle your claims. Please note that this would not be deemed non-performance of the contract on our part.

If we have received your data and process them on the basis of consent given by you, you can withdraw your consent at any time, to the effect that from the time we receive the withdrawal, we will no longer process your data for the purposes specified in the declaration of consent.

How to contact us

If you have any questions or concerns regarding data protection regulations, please contact us at datenschutz@vig.com.

Central information system

The Austrian Insurance Association, Schwarzenbergplatz 7, 1030 Vienna, operates central information systems for insurance companies for health, life and income protection insurance, as well as non-life, motor, legal and accident insurance. Our participation in these systems requires that we comply fully with all regulatory requirements. Full details of the personal data transmitted to these systems in connection with specific products can be found on our application forms. You can also request further information on our participation in these systems by writing to datenschutz@vig.com.