

Personal Data Protection Information

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, hereinafter "GDPR".

The protection of your data is very important to us. We hereby inform you about the manner in which your personal data is processed. The term "personal data" means any information relating to natural persons (e.g. first and last names, addresses, data contained in the contract, data relating to reported claims).

The controller of your personal data is Zürich Versicherungs-Aktiengesellschaft (Joint-Stock Company) with its registered office at Leopold-Ungar-Platz 2, 1190 Vienna.

You may contact us:

- in writing: at the registered office address indicated above;
- by email: datenschutz@at.zurich.com;
- by telephone, at: +43 (0)8000 80 80 80.

In Poland, the controller conducts its business through Zürich Versicherungs-Aktiengesellschaft (spółka akcyjna) oddział w Polsce, with its registered office at ul. Polna 11, 00-633 Warsaw.

You may exercise your rights as a data subject (e.g. the right to information, erasure of data) at the address datenschutz@at.zurich.com. Detailed information regarding the rights of data subjects is provided further in this privacy notice.

If you have any questions or concerns regarding the processing of your personal data by us, please contact our Data Protection Officer at the email address: dpo@at.zurich.com.

Purposes and legal bases for the processing of your personal data

We process your personal data in connection with our insurance business only to the extent necessary for the conclusion, performance and termination of the insurance contract. This includes in particular the assessment of the insurance application, the evaluation of the insurance risk, the fulfilment of advisory obligations, and the determination and verification of the validity of benefits.

Your personal data may also be processed for the purpose of handling and settling claims of injured parties, pursuing and realising subrogation claims, concluding and performing reinsurance contracts, as well as developing and improving insurance tariffs, products and services. Data is furthermore used for statistical purposes, conducting research relevant to insurance business (e.g. analyses of insured events), fraud prevention, fulfilment of obligations arising from legal provisions and supervisory requirements, as well as for marketing activities and market and opinion research.

Below we provide detailed information regarding the purposes and legal bases pursued in connection with the processing of your personal data.

1. Processing for the performance of a contract pursuant to Article 6(1)(b) of the GDPR

The processing of your personal data is necessary for the conclusion and performance of the insurance contract. This data is used in particular to assess the possibility of establishing an insurance relationship and to determine the terms of insurance cover, as well as to potentially amend the concluded contract. Data processing is also necessary for the issuance and delivery of the policy, the determination and settlement of claims arising from insured events, as well as for the handling of processes related to vehicle registration.

Furthermore, your personal data is used in the ongoing servicing of the contract, including the provision of information about changes in legislation or other circumstances that may affect your insurance relationship.

The conclusion and performance of the insurance contract require the processing of certain personal data. If such data is not provided, the conclusion of the contract and the provision of insurance cover may prove impossible.

2. Processing for compliance with a legal obligation pursuant to Article 6(1)(c) of the GDPR, and in the case of special categories of personal data also on grounds of substantial public interest, on the basis of Union or Member State law, pursuant to Article 9(2)(g) of the GDPR

We are subject to various legal obligations, in particular supervisory requirements, obligations related to the conduct of insurance and reinsurance business, obligations arising from accounting regulations, anti-money laundering and counter-terrorism financing regulations, as well as tax and reporting obligations. As an insurance undertaking, we are subject to the supervision of the Financial Market Authority (Finanzmarktaufsichtsbehörde) and - within a limited scope - the Polish Financial Supervision Authority (*Komisja Nadzoru Finansowego* – KNF), to which we provide information to the extent required by applicable law.

In connection with the above, we may process your personal data for the purpose of insurance risk assessment, presentation of an insurance offer, conclusion and performance of the insurance contract, claims handling, determination of the amount of benefits, calculation of insurance and reinsurance premiums, creation of technical insurance provisions, development of insurance tariffs and products, conducting statistical analyses, handling complaints and appeals, and fulfilment of obligations arising from mandatory legal provisions.

Furthermore, in connection with the conclusion and performance of the insurance contract, we may process health data of the policyholder, the insured person or the injured party, where this is necessary for the assessment of the insurance risk, the determination of the terms of insurance cover, the performance of the insurance contract, the handling of claims notifications and the determination, pursuit or realisation of claims arising from the insurance contract. Data processing is carried out in accordance with the GDPR and the legal provisions governing insurance activities.

3. Processing for the purposes of legitimate interests pursuant to Article 6(1)(f) of the GDPR, and in the case of special categories of personal data also for the establishment, exercise or defence of legal claims, pursuant to Article 9(2)(f) of the GDPR

In addition to the processing of personal data for the purpose of concluding and performing the contract or fulfilling obligations arising from legal provisions, we may process your personal data on the basis of a legitimate interest, having first balanced the interests and rights of data subjects.

In particular, personal data may be processed for the purpose of:

1. verifying the claims history, preventing and detecting insurance fraud and combating abuse, whereby our legitimate interest is the prevention of insurance crimes and protection against fraud;
2. concluding and performing reinsurance contracts, managing the reinsurance portfolio and limiting the insurance risk associated with the concluded contract, whereby our legitimate interest is the reduction of insurance risk;
3. determining the amount of insurance and reinsurance premiums, creating technical insurance provisions for solvency and accounting purposes, developing insurance tariffs and products and conducting statistical analyses, whereby our legitimate interest is the determination of premiums ensuring the fulfilment of obligations and coverage of operating costs, as well as the fulfilment of obligations arising from the regulations governing insurance activities, including regulations applicable to insurance undertakings conducting business in the territory of Poland;
4. marketing of our own products or services or those of the group of companies to which we belong (Zurich Group), including profiling for the purpose of determining preferences or needs in respect of insurance and financial products and presenting an appropriate offer, whereby our legitimate interest and that of the group of companies to which we belong (Zurich Group) is the provision of information about insurance products and the promotion of our own products or services;
5. conducting analytical activities, including the matching of services to customer needs and the optimisation of insurance products based on customer feedback and interest, whereby our legitimate interest is the improvement of the quality of products and services provided;
6. assessing creditworthiness and the ability to meet financial obligations related to the products or services offered, whereby our legitimate interest is the mitigation of financial risk and ensuring the proper performance of contracts;
7. conducting customer satisfaction surveys, monitoring the quality of service and undertaking measures to improve the quality of services provided, whereby our legitimate interest is the improvement of the quality of products and services provided;

8. assessing the individual risk situation of the customer, analysing the scope of insurance cover and identifying potential insurance needs, whereby our legitimate interest is ensuring adequate insurance cover and the proper assessment of insurance risk;
9. ensuring the security of networks, ICT systems, data and the continuity of services provided by electronic means, whereby our legitimate interest is ensuring information security, data protection and the security of our business operations;
10. recovery of amounts due under the insurance contract, whereby our legitimate interest is the ability to pursue amounts owed;
11. the establishment, exercise or defence against claims related to the insurance contract, including the pursuit of subrogation claims, whereby our legitimate interest is the ability to pursue claims or defend against claims.

4. Processing on the basis of your consent pursuant to Article 6(1)(a) of the GDPR and Article 9(2)(a) of the GDPR

On the basis of your separately given consent, we may process your personal data for the purposes specified in the content of that consent, in particular for the purpose of providing information about our products and services, products or services of entities within our group of companies (Zurich Group), additional services related to the concluded insurance contract, as well as conducting customer satisfaction surveys, polls, competitions or other informational and promotional activities, by telephone, email, SMS, mobile applications or other communication channels indicated by you, transferring personal data to other insurance undertakings for the purpose of insurance risk assessment, if you have given your separate consent thereto, as well as processing special categories of personal data, including health data, if this is covered by the scope of the consent given.

The legal basis for the processing of personal data for the above purposes is the consent given by you pursuant to Article 6(1)(a) of the GDPR, and in the case of special categories of personal data, including health data, Article 9(2)(a) of the GDPR.

You may withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing carried out before its withdrawal. From the moment we receive information about the withdrawal of consent, we will cease to process personal data to the extent covered by the withdrawn consent, unless there is another legal basis for their processing.

Necessity of processing your data

The provision of your personal data and, where applicable, the data of third parties whom you designate, is necessary for the assessment of your insurance risk, the establishment of the insurance relationship and the fulfilment of your benefit claims. If you do not provide us with this data or do not provide it to the required extent, the establishment of the insurance relationship you desire may not be possible or the fulfilment of your claim may not be possible. Please note that this will not be regarded

as non-performance of the contract on our part. The provision of personal data for marketing purposes is voluntary.

Recipients of your data

Your data is transferred only where:

- there is a contractual or legal basis for doing so,
- it is necessary to protect our overriding legitimate interest, or
- we have your consent for the transfer.

Your data is transferred only to the necessary extent. Your data is received, for example, by your insurance broker or insurance agent on the basis of and within the scope of the power of attorney granted by you.

Due to the considerable complexity of insurance business and legal requirements, we sometimes entrust service providers with the processing of your data. Also in the context of carrying out business matters, it may be necessary to process your data within our insurance group. In all cases of using service providers, appropriate data processing agreements are concluded in accordance with Article 28 of the GDPR.

It may happen that your data is transferred to recipients in third countries. However, we do so only where the European Commission has confirmed an adequate level of data protection (more information can be found [here](#)) or where there are other appropriate data protection safeguards meeting the requirements of the GDPR (e.g. agreement of EU standard contractual clauses on data protection – details are available [here](#)).

Your personal data may be transferred outside the European Economic Area – to Switzerland – within the Zurich Group and in connection with the performance of reinsurance contracts, for the purposes indicated above. The transfer of personal data to entities within the Zurich Group takes place on the basis of the adequacy decision referred to above.

You may request information about the safeguards applied or the place where they are made available by contacting us or our Data Protection Officer using the contact details indicated above.

A detailed list of possible data recipients can be found in the document “List of recipients and categories of recipients”, which constitutes **Appendix No. 1** to this Personal Data Protection Information.

Personal data security

The protection of your data against accidental or unlawful destruction, loss, alteration or unauthorised disclosure of, or unauthorised access to, data transmitted, stored or otherwise processed is ensured by means of technical and organisational measures.

These measures include, for example, the use of modern security software and encryption methods, physical access control to premises, authorisation systems and other safeguards against attacks and their prevention.

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 support the technical conditions for decryption.

Our internal data centres meet all ISO 27001 security standards. Our security standards also apply to the service providers we use.

Categories and source of personal data processed by us

We process your data that we have received directly from you in the course of our business relationship, e.g. when concluding a contract, reporting a claim, during an advisory consultation, making an enquiry, etc., to the extent indicated in the documentation provided in connection with the conclusion of the insurance contract. Your data has been provided to us in the scope of identification data, address and contact data, and information about the subject matter of insurance.

In the course of claims handling and benefit settlement, we may also receive your data from third parties, e.g. from the policyholder or their representing insurance broker, the tortfeasor, the injured party, witnesses, public authorities, other insurers, entities providing healthcare services and the National Health Fund, or from contractual partners within the framework of the insurance relationship (e.g. repair workshops).

Furthermore, we process – insofar as this is necessary for the provision of our services or the pursuit or defence of legal claims – data lawfully obtained from publicly available sources (e.g. the National Court Register, the Central Register and Information on Economic Activity) or provided to us by other third parties (credit information agencies).

Additionally, we may receive data from law enforcement and judicial authorities (e.g. from courts, public prosecutors' offices).

Retention period for your personal data

We store your data only for as long and to the extent justified by one of the purposes set out below, and we delete it without undue delay once the purpose ceases to apply.

We process your data for the purpose of preparing the insurance application, in order to assess whether and on what terms an insurance contract can be concluded, as well as for the purpose of documenting our information and advisory obligations.

Upon the conclusion of the insurance contract, we store your data in any event for the duration of our insurance relationship with you. After the termination of the contract, your data will be stored until the expiry of the limitation period for claims under the insurance contract or until the expiry of the data retention obligation arising from legal provisions.

Data will also be processed until the expiry of the entitlement to process data for the purpose of determining on the basis thereof the amount of insurance premiums, reinsurance premiums and technical insurance provisions for solvency and accounting purposes.

Insofar as the basis for data processing is consent, your personal data will be processed until its withdrawal. Insofar as data is processed on the basis of a legitimate interest, data will be processed until an effective objection is raised. Where it is necessary to pursue, establish or defend claims, your personal data may be processed until the expiry of the limitation period.

Automated individual decision-making

In the course of establishing a contractual relationship for selected products and the associated verification of your risk information, in individual cases IT systems may independently decide on possible risk exclusions or on the conclusion of the contract. These fully automated decisions are based on internally established rules for weighing and assessing available information, based on actuarial procedures. The consequence of such an assessment may be, in particular, the conclusion of the contract on specific terms, the refusal to conclude it, or the application of insurance cover exclusions. By means of appropriate measures, we ensure your right to obtain human intervention, to express your own point of view and to contest such a decision.

Your rights

You have the right to request information as to whether we process your data. If so, you may request information about the data itself, the purpose of processing, the categories of data, the recipients, the source of the data and the period of its storage.

If we process data concerning you that is inaccurate or incomplete, you may request its rectification or completion.

You may also request the erasure of your personal data in cases provided for by law, in particular where the data is no longer necessary for the purposes for which it was collected, the consent constituting the basis for processing has been withdrawn, or the data is being processed unlawfully.

You also have the right to request the restriction of processing in cases provided for by law. If it is unclear whether data concerning you is inaccurate, incomplete or being processed unlawfully, you may request the restriction of processing of your data until the matter has been finally clarified.

At any time you may, on grounds relating to your particular situation, object to the processing of data carried out for the purpose of protecting legitimate interests (Article 6(1)(f) of the GDPR).

You also have the right to object at any time to the processing of personal data for direct marketing purposes. In the event of an objection, data will no longer be processed for this purpose.

Where processing is based on consent, you may withdraw your consent at any time, without affecting the lawfulness of processing carried out before its withdrawal.

You may receive data concerning you that we process – insofar as we received it directly from you – in a structured, commonly used and machine-readable format determined by us, or instruct us to transfer such data directly to a third party of your

choice, provided that such recipient enables us to do so from a technical point of view and that the transfer of data is not prevented by disproportionate effort or statutory or other confidentiality obligations or confidentiality considerations on our part or on the part of third parties.

In all matters, please contact us using the contact details provided. In order to process your request, we may ask you to provide additional information necessary to confirm your identity.

If you believe that the processing of your data infringes data protection law or that your rights under data protection law have been otherwise violated, you have the right to lodge a complaint with:

- 1) the Polish data protection authority (President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw, Poland) or
- 2) the Austrian data protection authority (Datenschutzbehörde, Barichgasse 40–42, 1030 Vienna).

[Update of the data protection information](#)

This data protection information may be updated in the future in connection with changes, e.g. in legal provisions. You may obtain the current version of this information and a list of service providers with whom we maintain ongoing business relationships – broken down by individual companies – in the footer of our website, under the "Personal Data Protection" section.

Appendix No. 1 to the Personal Data Protection Information –

List of recipients and categories of recipients

List of recipients and categories of recipients

For the purposes of concluding, administering, performing and terminating the insurance contract, it is necessary to process your personal data. Due to the high complexity of insurance operations and legal requirements, it may be necessary to transfer your data to a wide variety of recipients. Below you will find detailed information about the recipients or categories of recipients to whom we may transfer your personal data.

Data is transferred only where it is necessary for the performance of the contract, where there is a legal obligation, where it is necessary to protect an overriding legitimate interest of ours or of a third party, or where you have given your consent.

In all such cases, your personal data is transferred or made available only to the absolutely necessary, minimum extent. This means that all data held is never transferred, but only such data as is necessary to achieve the specific purpose.

Within this framework – depending on the individual case – your personal data may be transferred in particular to the following third parties:

Processors within the Zurich group of companies

One of our fundamental principles is to carry out key data processing operations ourselves as part of our business activities or to entrust them to specialised companies within our group of companies (Zurich Insurance Group). These are the following companies, which under data protection law are to be regarded as processors within the meaning of Article 4(8) of the GDPR, and with which appropriate agreements have been concluded in accordance with Article 28 of the GDPR:

- **Zürich Versicherungs-Gesellschaft AG, Switzerland** - we obtain many of our IT services from our parent company, Zürich Versicherungs-Gesellschaft AG, based in Switzerland. The main tasks consist of providing the necessary IT structures and services.
- **Zurich Service GmbH** - Zurich Service GmbH operates our Call Centre in Vienna and takes care of our service-oriented communication with customers. It is responsible for the comprehensive servicing of our existing and potential new customers through various communication channels (primarily by telephone, email and chat).

Data processing by specialised service providers outside our group of companies

However, the complexity of today's data processing operations means that we also need to use specialised service providers outside our group of companies for various purposes and entrust them with the processing of your data.

When processing data outside our insurance group, our partners are carefully selected by us and obliged, in accordance with Article 28 of the GDPR, to treat your data confidentially and to comply with our own data protection standards. In particular, our partners are obliged to process your data solely within the scope of service provision. Under no circumstances are they permitted to transfer your data to third parties for advertising purposes or to use it commercially for their own benefit. We require our processors to ensure that all persons authorised to access the data are contractually bound to maintain confidentiality.

These may include the following categories of companies:

- **IT service providers**, e.g. data centres, software providers, IT support.
- **Scanning and printing service providers** for professional scanning of documents and printing of our postal mailings.
- **Market research institutes**, which carry out market analyses or studies on the behaviour, needs, attitudes, opinions, motivations, etc. of participants on our behalf.
- **Advertising agencies** for conducting competitions, television and radio campaigns, digital and analogue promotional activities.
- **Credit reference agencies** in the context of creditworthiness assessments.
- **SMS service providers**, if you use this service.
- **Security service providers** in the context of building protection and data security.
- **Archiving/disposal companies**: archiving and destruction of files/data carriers.
- **Data exchange platforms**: data exchange with brokers and agents, e.g. Together CCA.

Transfer of data to independent controllers

In the case of the following recipients, data processing is not the main purpose; therefore, this does not constitute the entrustment of processing within the meaning of data protection law, but rather the use of external specialist services provided by an independent controller or the necessary transfer of data to such a controller. Depending on the case, we may or must transfer your personal data to the following categories of recipients:

- **Insurance intermediaries.**
- **Other insurers** involved in claims handling (e.g. in the case of motor vehicle damage).
- **Co-insurers.**
- **Reinsurers.**
- **Claims regulation and settlement companies** (e.g. workshops).

- **Parties to the loss and benefit event** (e.g. beneficiaries, tortfeasors, injured parties).
- **Experts** (e.g. physicians, psychologists).
- **Forensic service providers.**
- **Statutory and contractual representatives** (e.g. parents, attorneys-in-fact).
- **Claims service providers/renovation companies/workshops** (e.g. roadside assistance, locksmiths, plumbers, medical transport companies).
- **Creditors, assignment creditors and mortgage creditors.**
- **Banks and credit institutions** for the execution of payment transactions.
- **Debt collection companies and service providers** in the context of combating fraud (e.g. detective agencies).
- **Lawyers** and legal advisers for the pursuit or defence of legal claims.
- **Various chambers and councils** (e.g. bar association, council of legal advisers, medical chamber, chamber of commerce).
- **Logistics service providers.**
- **Dispute resolution institutions** (interest groups, arbitration tribunals).
- **Written and oral translators.**
- **Financial Ombudsman** in the context of conciliation and intervention proceedings concerning disputes with customers.
- **Polish Chamber of Insurance** for the exchange of information within industry systems, e.g. for the prevention of insurance fraud.
- **External consultants** (e.g. management consultants, marketing agencies, research firms).

Your personal data may be transferred on the basis of a legal obligation to the following recipients:

- **Public authorities and institutions** (e.g. the Polish Financial Supervision Authority, the President of the Personal Data Protection Office, the European Insurance and Occupational Pensions Authority, the Austrian Financial Market Authority, domestic and foreign tax authorities) and Zürich Versicherungs-Gesellschaft AG as our parent company.
- **Courts and public prosecutors' offices.**
- **Court bailiffs** in the context of enforcement proceedings.
- **Court commissioner (notary).**
- **Insolvency administrator.**

- Tax authorities.
- Statutory auditors, tax advisers.
- Other offices and other public-law entities.

[Adaptation of this information](#)

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

[Gender-neutral language](#)

For the sake of better readability, we use the masculine form in our texts. These terms naturally refer to persons of all genders.