

Information on the use of your data regarding Risk-Engineering Services

Herewith we inform you about the processing of your personal data by the Zurich Resilience Solutions Europe GmbH and further involved Zurich entities and the rights to which you are entitled under data protection law.

Responsible Data-Controller

Zurich Resilience Solutions Europe GmbH
Platz der Einheit 2
60327 Frankfurt am Main
Telefon: 069/7115-0
Fax: 069/7115-3358
E-Mail: service@zurich.de

You can contact our Data Protection Officer:

Zurich Gruppe Deutschland
Konzerndatenschutz
50427 Köln
E-Mail: datenschutz@zurich.com

Origin and categories of personal data

In principle, we collect personal data directly from the data subject.

In certain cases, however, we may receive personal data from third parties.

Examples:

- If an existing customer of a Zurich Insurance plc.-Branch (Zip) asks for Risk-Engineering Services of the Zurich Resilience Solutions Europe GmbH (ZRSE)) and the transfer of his data to ZRSE for this purpose
- If you are named as a contact person by your employer and he gives us your name, e-mail, telephone or mobile-number.
- If you are active as a member of the management or as a body of a company and in the course of risk engineering it is looked into whether there are possible risks that make it advisable to consider you as an insured person of an appropriate risk coverage.
- Or it may be necessary to discuss certain business areas for the risk analysis with the technically responsible persons of individual work areas. In this context, we may be given your contact details.
- In the case of returned mail, specialized service providers carry out an address research in order to determine current address data.
- We may receive data on co-insured or insured persons via our sister companies, as far as our risk engineering customer has these data passed on to us for the execution of the risk analysis.
- We may receive data on guarantors, lenders, lessors, surety or guarantee creditors and claim holders from our customers. Conversely, we may also receive data on the

customer from them, in particular contact data and information on the risk concerned.

- In the context of legal disputes we receive data on involved persons; i.e. witnesses, solicitors, experts etc.
- We also receive personal data about you via your responsible intermediary, e.g. as part of a Request for Risk-Engineering Services.

Purposes and legal bases of data processing

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG), the relevant provisions of the Insurance Contract Act (VVG) and all other relevant laws in Germany. In addition, the Insurance Companies of Zurich Group Germany have committed itself to the "Rules of Conduct for the Handling of Personal Data by the German Insurance Industry", which specify the above-mentioned laws for the insurance industry. These can be found under www.zurich.de/datenschutz

If you request for Risk-Engineering Services by ZRSE, we need the information, which risks might already be covered by existing Insurances. Conversely if you ask Zurich Insurance for a Risk-Solution, they need to know, what Risks ZRSE might have named. So these data will be transferred when you ask for such services.

The Risk-Engineering Services by ZRSE cannot be provided without the transfer of the Insurance-data from Zip to ZRSE. Conversely an offer for analyzed Risks is not possible without transmission of the Risk-Analysis from ZRSE to Zip.

In addition, we need your personal data to create specific statistics, e.g. for the development of our Risk-Engineering Services. We use the data from all existing contracts with a Zurich company to examine the entire customer relationship, for example to optimize our Service for you, to provide advice, to adjust or supplement a contract, to make goodwill decisions or to provide comprehensive information.

The legal basis for such processing of personal data for pre-contractual and contractual purposes as well as for claims processing is Art. 6 para. 1 b) GDPR. Insofar as special categories of personal data are required for this purpose (which is regularly not the case in commercial insurance), we obtain your consent in accordance with Art. 9 para. 2 a) in conjunction with Art. 7 GDPR. If we compile statistics with these data categories, this is done on the basis of Art. 9 para. 2 j) DSG-VO in conjunction with § 27 BDSG.

We also process your data in order to protect legitimate interests of ourselves or third parties (Art. 6 Para. 1 f) GDPR.

This may in particular be necessary

- to ensure IT security and IT operations,
- for an overall view of your customer relationship with the companies of the Zurich Group,
- to promote our products and other products of Zurich Group companies and their cooperation partners as well as market and opinion surveys, to the extent permitted by law,
- for the prevention and clarification of criminal offences, in particular we use data analyses for the recognition of indications that may indicate insurance misuse.

In addition, we process your personal data to meet legal obligations, such as regulatory requirements, commercial and tax retention obligations or our obligation to provide advice or to be compliant with anti-terror-financing-laws or Sanctions-Screening-Regulations. In these cases, the legal basis for the processing is the respective legal regulation in conjunction with Art. 6 Para. 1 c) GDPR.

Should we wish to process your personal data for a purpose not mentioned above, we will inform you of this beforehand within the framework of the statutory provisions.

Categories of recipients of personal data

Self-employed Field-Service:

Insofar as an intermediary or broker is responsible for your insurance contracts and is also involved by you in Risk-Engineering, your intermediary will process the necessary data.

Data processing in the Zurich Group Germany:

Specialized companies or divisions of our Group perform certain data processing tasks centrally for the companies affiliated with the Zurich Group. Where a contract exists with one or more companies in our Group, your data may be processed centrally by a Group company for example for the central administration of address data, for customer service by telephone, for contract and claims processing, for collection and disbursement or for joint mail processing. In the overview of the service providers of the Zurich Group Germany in the current version on our Internet site at www.zurich.de/datenschutz you will find the companies that participate in centralized data processing.

External service providers:

We make use of external service providers to fulfil our contractual and legal obligations.

A list of the contractor- and service provider, with which we do not only have temporary business relationships, can

be found in the overview of service providers of the Zurich Group Germany.

Further recipients:

As the Risk-Engineering Services are offered throughout Europe, various Zurich-entities work together globally here. Below you find a list of these companies with contact details.

In addition, we may transfer your personal data to other recipients, such as authorities to comply with statutory reporting requirements (e.g. social insurance carriers, tax authorities or law enforcement agencies).

Duration of data storage

We will delete your personal data as soon as they are no longer required for the above-mentioned purposes. It may happen that personal data is stored for the period in which claims can be asserted against our company (statutory limitation period of three or up to thirty years). In addition, we store your personal data insofar as we are legally obliged to do so. Corresponding duties of proof and storage arise from the German Commercial Code, the Tax Code and the Money Laundering Act. The storage periods are thereafter up to ten years.

Information on the essence of a Joint Controller Agreement

In order to be able to offer expert advice in Risk-Engineering throughout Europe, the companies of the Zurich Group listed below work together and have concluded a Joint Controllorship Agreement regarding personal data. The essential cornerstones are:

- All participating companies ensure compliance with the data protection regulations that apply to their customers' data in their respective countries
- ZRSE gives the informations in this document to the customers of Risk-Engineering-Services of ZRSE
- If you have a questions on Data protection or want to execute your data protection rights, you are asked to revert to the ZRSE (contacts see above on page 1), who shall answer such Requests centrally. In case a data subject contacts one of the other involved controllers, it will forward the request to the ZRSE.

The further Zurich-entities are:

- Zurich Insurance Company Ltd., Mythenquai 2, 8002 Zurich, Switzerland; Contact for privacy-requests: Privacy Compliance Officer, E-Mail privacy@zurich.com
- Zurich Insurance plc, Niederlassung für Deutschland, Platz der Einheit 2, 60237 Frankfurt a.M., Germany; Contact Data Privacy Officer: datenschutz@zurich.com
- Zurich Insurance plc, Finland Branch, Eteläesplandadi 22A, 00130, Helsinki, Finland; Contact Data Privacy Officer: tietosuojavastaava.fi@zurich.com

- Zurich Insurance plc, Denmark Branch, Frederiksgade 17, 1, 1265 København K, Denmark; Contact Data Privacy Officer: databeskyttelsesradgiver.dk@zurich.com
- Zurich Insurance plc, Norway Branch, Bygdøy Alle 1, 0257 OSLO, Norway; Contact Data Privacy Officer: personvernombud.no@zurich.com
- Zurich Insurance plc, Sweden Branch, Linnégatan 5, 114 47 Stockholm, Sweden; Contact Data Privacy Officer: dataskyddsbud.se@zurich.com
- Zurich Insurance plc, Belgium Branch, Corporate Village, Building Caprese, Da Vincilaan 5, 1930 Zaventem, Belgium; Contact Data Privacy Officer: nathalie.parmentier@zurich.com
- Zurich Insurance Plc, Netherlands Branch, World Trade Center, Prinses Margrietplantsoen 65, 16th floor, 2595 BR Den Haag, The Netherlands; Contact Data Privacy Officer: goddin.lee@zurich.com

Your rights as a data subject

You can request information about the personal data stored about you at the above address. In addition, under certain conditions you can request the correction or deletion of your data. You may also have the right to limit the processing of your data and the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format.

Right to object

You have the right to object to the processing of your personal data for purposes of direct marketing without stating reasons. If we process your data to safeguard legitimate interests, you may object to this processing for reasons arising from your particular situation. We will then no longer process your personal data unless we can prove that there are compelling legitimate grounds for processing which override your interests, rights and freedoms or the processing serves the establishment, exercise or defence of legal claims.

Right to complain

You have the option of contacting our above-mentioned Data Protection Officer with a complaint. You also have the right to complain to a Data Protection Supervisory Authority. The data protection supervisory authority responsible for us is:

Der Hessische Datenschutzbeauftragte
Postfach 31 63
65021 Wiesbaden

Data transfer to a third country

If we transfer personal data to service providers outside the European Economic Area (EEA), the transfer will only take place if the third country has been confirmed by the EU Commission as having an adequate level of data protection or if other appropriate data protection guarantees (e.g. binding internal company data protection regulations or EU-Standard Contractual Clauses) are in place. Detailed information on this and on the data protection level of our service providers in third countries can be found in the overview of the service providers of the Zurich Group Germany in the current version on our website:

www.zurich.de/datenschutz

Updating of the information on the use of your data

This data protection notice may be amended at a later date due to changes, e.g. in legal provisions. You can find the current version of these notices as well as our List of service providers with which we don't only have temporary business relationships on our website:

www.zurich.de/datenschutz