

## Privacy Policy

### – For customers of Euro Accident

Euro Accident Health & Care Insurance Aktiebolag ('Euro Accident') is the controller for your personal data that will be processed in compliance with the personal data legislation applicable at any given time. Euro Accident protects your personal privacy. This information explains how Euro Accident collects and uses your personal data. The information also describes what personal data is collected and also your rights in relation to Euro Accident and how you can exercise your rights.

It is important that you read and understand the Privacy Policy and feel confident about our processing of your personal data. You are always welcome to contact us if you have any questions.

You can easily navigate to the sections of particular interest to you with the help of the list of contents below.

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### What is 'personal data' and what is 'the processing of personal data'?

'Personal data' means any information relating to an identified or identifiable natural person. The decisive factor is that the data, individually or in combination with other data, can be linked to a living person. Typical personal data includes personal identity (ID) number, name and address. Identification numbers, such as customer number, policy number and claim number, are also personal data. Similarly, pictures and sound recordings of individuals that are processed on computers may be personal data even if no name is mentioned in the event that it can be linked to natural persons.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation is deemed to be 'sensitive personal data'. Euro Accident processes data about your health in the event that this is necessary for our activities, and always observing such security and secrecy required for the processing of such personal data.

The processing of personal data means everything that happens with personal data. Every operation performed with personal data constitutes processing, irrespective of whether or not this is performed by automated means. Examples of normal processing are collection, recording, organisation, structuring, storage, adaptation, transmission and erasure. This information text only encompasses such processing wholly or partly by automated means, and also other processing of personal data that forms or will form part of a filing system.

### Who is responsible for the personal data we collect?

Euro Accident Health & Care Insurance Aktiebolag, corporate identity (ID) number 556551-4766, of the address

Bäckgatan 16, SE-352 31 Växjö, Sweden is the controller for the company's processing of personal data.

## What personal data do we collect about you as a customer and for what purpose (why)?

**Euro Accident processes your personal data to:**

Purpose	Legal basis	Categories of personal data
Assess the insurance risk of applications submitted based on Euro Accident's Risk Assessment Guidelines applicable at any given time. This is done in conjunction with applications for insurance but may also be done during the term of the insurance.	<p>Voluntary insurance: The processing is necessary to enable Euro Accident to take measures at your request before an insurance contract is concluded. Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims.</p> <p>Mandatory insurance: The processing is necessary for Euro Accident's legitimate interest in providing you with insurance protection. Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims.</p>	Name, surname, personal identity (ID) number, address, postcode, district, telephone number, email address, payment option, sum insured chosen, type of insurance and also health data provided in the health declaration and also, when applicable, supplementary health data provided in questionnaires, medical opinions and in records that you have provided to Euro Accident. Data is also processed about bank, clearing number, account number and payment interval.
Grant insurance and to confirm your identity and verify your personal and contact details.	<p>Voluntary insurance: The processing is necessary to enable Euro Accident to take measures at your request before an insurance contract is concluded. The processing is also necessary to administer and perform contracts concluded and also to comply with the Insurance Contracts Act (2005:104) and also the Act on Measures against Money Laundering and Terrorist Financing (2017:630).</p> <p>Mandatory insurance: The personal data is processed for Euro Accident's legitimate interest in being able to provide you with insurance protection and also to comply with Euro Accident's legal obligations under the Insurance Contracts Act (2005:104) and also the Act on Measures against Money Laundering and Terrorist Financing (2017:630).</p>	Name, surname, personal identity (ID) number, postal address, postcode, district, telephone number, email address, payment option, sum insured chosen, type of insurance and also details about bank, clearing number, account number and payment interval.

<p>Calculate premiums and also produce statistics of, among other things, losses and conduct an analysis of premiums.</p>	<p>Voluntary insurance: The processing is necessary to enable Euro Accident to perform the insurance contract. The processing is also necessary for Euro Accident's legitimate purpose in being able to provide you with insurance protection and also run a solvent insurance business.</p> <p>Mandatory insurance: The personal data is processed for Euro Accident's legitimate interest in being able to provide you with insurance protection and also run a solvent insurance business.</p>	<p>Name, surname, personal identity (ID) number, salary details, premium information, postcode and LKF (county/municipality/parish) code.</p>
<p>Administer and perform the insurance contract, such as register, deregister and also keep a register of insurance and nominations of beneficiaries and also administer dispatch of premium invoices, insurance and annual statement including post-sales information and cancellation letters.</p> <p>Data is also processed to provide a good service, such as responding to customer enquiries by, for example, email or telephone, drawing up certificates of insurance holdings, etc. and dealing with complaints.</p>	<p>Voluntary insurance: The processing is necessary to enable Euro Accident to perform the insurance contract with you and also to enable Euro Accident to comply with legal obligations under the Insurance Contracts Act (2005:104). The processing is also necessary for Euro Accident's legitimate purpose of being able to contact you and also correspond with you when you contact the company via different communication channels such as email or telephone.</p> <p>Mandatory insurance: The processing is necessary for Euro Accident's legitimate interest in being able to provide you with insurance protection and also to enable Euro Accident to comply with legal obligations under the Insurance Contracts Act (2005:104). The processing is also necessary for Euro Accident's legitimate purpose of being able to contact you and also correspond with you when you contact the company via different communication channels such as email or telephone.</p>	<p>Name, surname, personal identity (ID) number, postal address, address, postcode, district, telephone number, email address, payment option, sum insured chosen, type of insurance and premium. Data about bank, clearing number, account number and payment interval and salary details is also processed.</p>
<p>Send marketing such as newsletters, offers, invitations, advertising and conduct customer surveys (e.g. name, email address, postal address and information about insurance previously applied for).</p>	<p>The processing is necessary for Euro Accident's legitimate purpose of distributing marketing, news, invitations to events and offers of Euro Accident's services and also to get your opinion about Euro Accident with a view to improving the company's business.</p>	<p>Name, surname, address, postcode, district, and also email address and data provided in conjunction with customer surveys.</p> <p>Euro Accident also processes information about how you interact with Euro Accident – how you use Euro Accident's services, including response time for pages, download errors, how you reached, navigate within and leave the service.</p>

<p>To be able to evaluate, develop and improve our services and systems for you as a customer.</p>	<p>The processing is necessary for Euro Accident's legitimate purpose of being able to evaluate, develop and improve our services and systems for you as a customer with a view to improving the customer experience in conjunction with a visit to Euro Accident's website and also mobile applications.</p>	<p>Information about how you interact with Euro Accident – how you use Euro Accident's services, including response time for pages, download errors, how you reached, navigate within and leave the service.</p> <p>Unit information - e.g. IP address, language settings, web browser settings, time zone, operating system, platform, settings for unit and screen resolution.</p> <p>Location information - information about your exact location using methods that include GPS, wireless networks, mobile towers, Wi-Fi access points and other sensors, e.g. gyroscopes, accelerometers and compasses.</p> <p>Log information – detailed information about how you have used our services.</p> <p>Unit information, for example, type of unit and language, time of access, pages viewed, IP address, identification of unit, address, cookies linked to cookies or other technology that can uniquely identify your unit or web browser.</p>
<p>To settle insurance matters reported and insurance claims based on insurance conditions applicable at any given time, i.e. investigate whether there is valid insurance, determine date of claim, assess current reserve, assess whether the claim for insurance compensation is indemnifiable and also, when applicable, pay insurance compensation.</p>	<p>Voluntary insurance: The processing is necessary to perform the insurance contract with you. Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims.</p> <p>Mandatory insurance: The processing is necessary for Euro Accident's legitimate purpose of providing you with insurance protection. Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims.</p>	<p>Data from, among other things, claim notification forms, such as name, surname, personal identity (ID) number, policy number, claim number, details about employer, address, postcode, district, telephone number, email address, bank, account number, clearing number, premium, account of the insurance case (both accident and sickness) and details about the sickness/condition such as when symptoms were discovered, diagnosis made, medical history and which physicians were seen. Euro Accident also processes health data in records, medical documents, certificates and opinions from physicians, medical advisers and certificates from the Swedish Public Employment Service and Swedish Social Insurance Agency, receipts, certified ID document, invoices and data on invoices. When applicable, data is processed about monthly premium, salary information, data about childcare allowance, data about incapacity to work and unemployment, certificate of sick leave, level of sick leave, data about profession and also job description and also certificate of sickness benefit and data about treatment. Data is also processed about rehabilitation initiatives implemented and data provided in</p>

		<p>'final reports' for rehabilitation matters and also other information provided in the notification of claim.</p> <p>When applicable, data is processed about 'cohabitation' in conjunction with cohabitation investigations. Examples of data processed are name, address details, claim information, address information, information about alleged cohabitation relationship.</p> <p>Personal data provided in conjunction with telephone conversations with the person handling the matter at Euro Accident is also processed.</p>
Register notified claims in the insurance industry's joint register for insurance claims. The controller for the register is Skadeanmälningsregister (GSR) AB.	The processing is necessary for Euro Accident's legitimate purpose of being able to identify unclear insurance cases and avoid payments of insurance compensation based on inaccurate data.	Name, surname, personal identity (ID) number, claim number, data about insurance and data about notified insurance claim.
Administer payments and receipts from you as a customer in conjunction with settlement of insurance matters and also compile financial reports for reporting purposes for your insurance intermediary and for Euro Accident's reinsurance provider. The personal data is also processed for bookkeeping purposes.	<p>Voluntary insurance: The processing is necessary to perform the insurance contract with you. Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims. The processing is also necessary to comply with applicable legislation such as the Bookkeeping Act (1999:1078). Furthermore, the processing is necessary for Euro Accident's legitimate purpose of providing you with insurance protection.</p> <p>Mandatory insurance: The processing is necessary for Euro Accident's legitimate purpose of providing you with insurance protection. Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims. The processing is also necessary to comply with applicable legislation such as the Bookkeeping Act (1999:1078).</p>	<p>Name, surname, personal identity (ID) number, address, postcode, district, email address. Data is also processed about bank, clearing number, account number, payment interval, claim number, policy number, contract number, contract name, effective date, insurance year (start and end date), insurance product, insurance component, insurance class (life, non-life), broker/intermediary (name, e.g. Försäkringsförmedlaren AB), written premium, unearned premium, data about commission.</p> <p>The following data is also processed: event ID, transaction ID, amount, payment date, accounting date, date on which the event was registered, contract number, contract name, sub-contract number, sub-contract (e.g. Björsons Måleriklubb), product code, coverage code, policy number (no. on insurance), external policy number (intermediary's no. for insurance), original start, LKF (county/municipality/parish) code, status of claim matter (ongoing, closed), date of claim, notification date, claim code (for example, Accident, child insurance), product number, component, date of registration, opening reserve, closing reserve, claim ID, payment ID, transaction ID, amount, date of payment, payment code name (e.g. visit – general practitioner), date of treatment, date of registration, underwriting year and also insurance provider.</p>

<p>To comply with applicable legislation, such as information requirements and requirements for timely disbursement of insurance compensation, which is stipulated in the Insurance Contracts Act (2005:104), requirements for customer due diligence and duty to report in the Act on Measures against Money Laundering and Terrorist Financing (2017:630), requirements for the preservation of accounting information in accordance with the Bookkeeping Act (1999:1078), information requirements in the General Data Protection Regulation and also reporting requirements under the Solvency II Rules and Regulations.</p>	<p>Voluntary insurance: The processing is necessary to enable Euro Accident to perform the insurance contract with you and also to comply with applicable legislation, such as the Insurance Contracts Act (2005:104), Act on Measures against Money Laundering and Terrorist Financing (2017:630), the Bookkeeping Act (1999:1078), the General Data Protection Regulation and also the Solvency II Rules and Regulations.</p> <p>Mandatory insurance: The processing is necessary for Euro Accident's legitimate purpose of providing you with insurance protection and also complying with applicable legislation such as the Insurance Contracts Act (2005:104), Act on Measures against Money Laundering and Terrorist Financing (2017:630), the Bookkeeping Act (1999:1078), the General Data Protection Regulation and also the Solvency II Rules and Regulations.</p>	<p>Name, surname, personal identity (ID) number, address, email address, postcode, district and, when applicable, financial data such as insurance compensation and details of holding of insurance.</p>
<p>To follow up and analyse the company's results and risk profile, develop methods and models for reserves and allocation to technical provisions. Produce overall guidelines for pricing and risk selection, produce supporting information for financial reporting, both internal and external reporting.</p>	<p>The processing is necessary for Euro Accident's legitimate purpose of providing you with insurance protection and also complying with applicable legislation such as the Bookkeeping Act (1999:1078) and also the Solvency II Rules and Regulations. Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims.</p>	<p>Claim number, policy number, contract number, contract name, effective date, insurance year (start and end date), insurance product, insurance component, insurance class (life, non-life), insurance intermediary (for example, Försäkringsförmedlaren AB), written premium, unearned premium, data about commission, deferred acquisition cost, event type (e.g. payment, depreciation).</p> <p>The following data is also processed: event ID, transaction ID, amount, payment date, accounting date, date on which the event was registered, contract number, contract name, sub-contract number, sub-contract (e.g. Björsons Måleriklubb), product code, coverage code, policy number (Euro Accident's number for insurance), external insurance number (intermediary's for insurance).</p> <p>Euro Accident also processes data about original start, LKF (county/municipality/parish) code, status of</p>

		claim matter (ongoing, closed), date of claim, notification date, claim code (for example, accident, child insurance), product number, component, date of registration, opening reserve, closing reserve, claim ID, payment ID, transaction ID, amount, date of payment, payment code name (e.g. visit – general practitioner), date of treatment, date of receipt, date of registration, underwriting year, insurance provider and currency code.
To maintain, improve, troubleshoot, develop and also test Euro Accident's IT system with a view to, for example, minimising fraud, streamlining services or insurance administrative systems and their functions, including troubleshooting for the above-mentioned systems and integrations. The data is also processed for data analysis and to improve efficiency and satisfy the rights of data subjects, such as access to personal data and also the protection of personal data.	The processing is necessary for Euro Accident's legitimate purpose of minimising fraud, streamlining the company's services and insurance administrative systems and functions and also looking after the rights of data subjects in an effective way.	Name, surname, personal identity (ID) number, address, postcode, district, telephone number, email address, payment option, sum insured chosen, type of insurance and also claim ID (matter number) including associated transactions. Data about bank, clearing number, account number and payment interval is also processed.

**For those calling Euro Accident's Medical Call Center with a view to using healthcare insurance**

Personal data is processed by Euro Accident's Medical Call Center for the provision of medical advice and also for drawing up records. Personal data is also processed to enable Euro Accident to administer the medical advisory service and care planning by (e.g. pursuant to your consent) booking healthcare consultations on your behalf. Personal data is also processed to enable communication with you as a patient relating to your care and your healthcare consultations. Euro Accident also processes your personal data to systematically develop and assure the quality of the business on an ongoing basis and to administer (e.g. pay care provider invoices and investigate whether there is	<p>Voluntary insurance: The processing is necessary to enable Euro Accident to perform the insurance contract with you, comply with applicable legislation such as the Swedish Patient Data Act (2008:355) and the Insurance Contracts Act (2005:104). Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims. The processing of personal data, including sensitive personal data, that is performed in conjunction with the medical advisory service and record keeping is also necessary for the provision of health and medical care and also for health care purposes on the basis of the provisions in the Swedish Patient Data Act (2008:355).</p> <p>Mandatory insurance: Euro Accident's legitimate purpose of providing you with insurance protection as insured, complying with applicable legislation such as the Swedish Patient Data Act</p>	Name, surname, personal identity (ID) number, telephone number, email address, record entries where, among other things, health data such as symptoms, diagnosis, patient history, treatment, etc., is specified. Personal data that arises in conjunction with the recording of telephone conversations with the person dealing with the matter is also processed.
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<p>entitlement to care), but also to follow up, evaluate and deal with supervision in the business.</p> <p>Conversations with the Medical Call Center are recorded for both claim settlement purposes and for record keeping.</p>	<p>(2008:355) and the Insurance Contracts Act (2005:104). Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims. The processing of personal data, including sensitive personal data, that is performed in conjunction with the medical advisory service and record keeping is also necessary for the provision of health and medical care and also for health care purposes on the basis of the provisions in the Swedish Patient Data Act (2008:355).</p>	
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#### For those using Euro Accident's mobile application

<p>Personal data is processed by Euro Accident to provide the company's mobile application with its function and services, such as option to access insurance information, see and deal with information and functions relating to healthcare insurance, and also to communicate with you via the mobile application.</p>	<p>Voluntary insurance: The processing is necessary to perform the insurance contract with you. The processing is also necessary owing to Euro Accident's legitimate interest in effectively communicating with its customers. Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims.</p> <p>Mandatory insurance: The processing is necessary for Euro Accident's legitimate purpose of providing you with insurance protection. The processing is also necessary owing to Euro Accident's legitimate interest in effectively communicating with its customers. Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims.</p>	<p>Personal and contact information: name, date of birth, personal identity (ID) number, email address, mobile telephone number, etc.</p> <p>Payment information: credit and debit card data (card number, date of validity and CVV code), bank account number, etc.</p> <p>Information about insurance holding: details relating to the insurance you have applied for with Euro Accident.</p> <p>Financial information: history in respect of payment of deductibles, compensation requested and compensation paid, and also supporting information in the form of, for example, receipts and invoices.</p> <p>Historical information: your healthcare consultations, deductibles paid, compensation received, and also expired healthcare consultation tickets.</p> <p>Info about your matters, healthcare consultations booked and healthcare tickets.</p> <p>Pictures: pictures of receipts, invoices or the like that are submitted to Euro Accident as supporting information for compensation claims.</p>
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**For those contacting Euro Accident by email or telephone**

Personal data is processed by Euro Accident to respond to your questions via web forms, telephone or email messages and provide good service.	The processing is necessary for Euro Accident's legitimate purpose of contacting you and also corresponding with you when you contact the company via different communication channels such as by email or telephone and also, when applicable, performing the insurance contract with you. Sensitive personal data is processed on the basis that it is necessary to establish, exercise or defend legal claims.	Name, surname, email address, telephone number, and also the personal data you provide to Euro Accident in the email message or alternatively in conjunction with the telephone conversation.
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**From what sources do we collect your personal data?**

Your personal data is collected directly from you or alternatively from a third party.

**Personal data that we may collect from you:**

We collect the data you provide us with directly in conjunction with you applying for insurance, making a notification of a claim or alternatively contacting Euro Accident in a customer matter or claim settlement matter by, for example, post, email or telephone. As a new customer, we ask you, for example, for personal data such as name, personal identity (ID) number, email address and telephone number as well as data about insurance desired, sum insured, payment method, etc., to be able to offer you the product or service in which you are interested.

Euro Accident also collects information that you notify us of, e.g. through feedback or another interaction in our digital channels, such by email or via Euro Accident's mobile application. Furthermore, conversations with you are recorded and registered for claim settlement purposes and verification of agreements, documentation and also for quality and improvement purposes.

**Personal data that we may collect from a third party:**

Euro Accident may also collect personal data about you via a third party, e.g. from your employer or your insurance intermediary when applying for insurance.

Data may also be collected from, for example, public or other externally available sources, such as records kept by public authorities (e.g. the Swedish population register and the records of the tax authority, the company register and the insurance industry's joint register for insurance claims), sanctions lists (at international organisations such as the EU and UN and similarly national organisations such as the American Office of Foreign Assets Control (OFAC)), records kept by other commercial information providers of data about, for example, beneficial owners and politically exposed persons.

**With whom may we share your personal data?**

Euro Accident may transfer to, or share your information with, the following selected third parties. We take all reasonable legal, technical and organisational measures to ensure that your personal data is processed securely and with an adequate level of protection when transferring to or sharing with such selected third parties. Before we share your personal data, we always ensure that we have the right to disclose the personal data and we also comply with the obligations of secrecy applicable for the financial sector.

Euro Accident may transfer personal data to, or share your information with, the following selected third parties:

**Cooperating partners (suppliers and subcontractors), such as companies within the Euro Accident Group and**

**external companies** – Euro Accident may share your personal data with suppliers and subcontractors for the performance of our contractual commitments in relation to you and for other purposes as indicated by this information text.

We have concluded contracts with selected suppliers which are in line with the requirements imposed by the personal data legislation applicable at any given time and include provisions about the processing of personal data on our behalf. There are suppliers, for example, within the operational areas of reinsurance, claim settlement, medical risk assessment and advisory services, administration of insurance documentation, development, maintenance, operation and support of IT systems and also telephony. Data may also be disclosed to Euro Accident's legal representatives, rehabilitation consultants, care providers in Euro Accident's care provider network, banks and also to your insurance intermediary.

Some personal data is also disclosed to Euro Accident's American parent company, National General Holdings Corp, for data storage.

Euro Accident does not allow subcontractors under any circumstances to use personal data for purposes other than those Euro Accident has informed you about.

**Public authorities** – Euro Accident may provide necessary information to public authorities such as the Police, Swedish Tax Agency, Swedish Social Insurance Agency or other public authorities if we are obliged to do this according to law and you have approved that we do so. One example of a legal obligation to provide information is for measures to combat money laundering and terrorist financing.

**Disposal** – Euro Accident may share information with third parties:

- a) In the event that Euro Accident sells or purchases a business or assets, Euro Accident may provide your personal data to a potential seller or purchaser of such business or assets.
- b) If Euro Accident or a significant part of Euro Accident's assets are acquired by a third party, personal data about Euro Accident's contact details for cooperating partners may be shared.
- c) Disclosure according to a) and b) above always occurs under an obligation of strict secrecy.

No further disclosures or transfers to third parties other than those stated above will occur unless you receive information about such transfer.

## Where does Euro Accident process your personal data?

Euro Accident always strives to process your personal data within the EU/EEA. However, in certain situations and for specified purposes, the personal data may be transferred to, and processed in, countries outside the EU/EEA by a company within the Euro Accident Group. As Euro Accident is firmly committed to always protecting your personal data, Euro Accident will take all reasonable legal, technical and organisational measures to ensure that your personal data is processed securely and with an adequate level of protection comparable with, and at the same level as, the protection offered within the EU/EEA.

Personal data is only transferred to third countries, i.e. countries outside the EU and EEA area, in exceptional cases and subject to the precondition that:

- a) the EU Commission has decided that there is an adequate level of protection in the country in question, or
- b) other appropriate safeguards have been taken, e.g. that standard contractual clauses (EU's model clauses) that have been approved by the EU Commission are used or that the recipient has Binding Corporate Rules (BCRs), or

- c) it involves a derogation in a specific situation, e.g. to perform a contract with you or if you give your consent to the specific transfer.

You can access a copy of the relevant EU model clauses that Euro Accident uses for transfers by going to [www.euroaccident.com/lex.europa.eu](http://www.euroaccident.com/lex.europa.eu) and searching for 32010D0087.

Euro Accident processes your data in Sweden. Personal data will also be transferred to Euro Accident's parent company in the United States for data storage and also to Euro Accident's IT developers in Serbia.

The transfer of personal data to both United States and Serbia is covered by suitable safeguards. Euro Accident has concluded a contract with the cooperating partners in the United States and Serbia respectively which includes standard contractual clauses (EU's model clauses) which have been approved by the EU Commission.

### How do we protect your personal data?

Keeping your personal data in a safe and secure way is a central part of how we do business. Euro Accident has taken appropriate technical, organisational and administrative security measures to protect the data we have against loss, abuse and unauthorised access, disclosure, alteration and destruction. Only those persons who actually need to process your personal data to enable us to fulfil our specified purposes have access to the personal data.

### For how long do we save your personal data?

We save your data for as long as it is required for the purposes for which it has been collected and processed or for as long as it is required according to laws and other statutes.

This means that we save your data for as long as is necessary to perform a contract and as long as is required according to applicable minimum requirements for storage periods in laws and other statutes. In cases where we retain your data for purposes other than for performing a contract (e.g. to establish, defend or exercise legal claims, requirements to combat money laundering, bookkeeping and requirements according to the capital adequacy rules), we only retain such data if it is necessary and/or required for the purpose in question according to what is indicated by the respective law or other statute.

Different laws have different requirements for storage periods. Some examples of situations that require data storage: Prevent, detect and investigate money laundering, terrorist financing and fraud: at least five years after a business relationship has been terminated or an individual transaction implemented.

Reporting legislation: up to seven years following expiry of the calendar year in which the financial year ended. Medical records: 10 years. Group insurance not granted: 7 months. Individual insurance not granted: 24 months.

Specific provisions for other services or products, for example, insurance: according to the Insurance Contracts Act, any person who wants to have insurance compensation or other insurance protection must institute proceedings within ten years from the date when the circumstance that, according to the insurance contract, entitles this person to such protection took place. Insurance often has different compensation components, which means that the date when the circumstance that, according to the insurance contract, entitles the person to insurance compensation took place differs between different types of insurance and between the respective compensation components of the insurance. This means that Euro Accident will often need to save personal data for a period of more than 10 years after an insurance contract has been terminated.

The examples above are only explanations and minimum requirements for storage periods. Please visit Euro Accident's website ([www.euroaccident.com](http://www.euroaccident.com)) for complete information about and exact time limits for storage and erasure of your personal data.

## Backups

Storage is a form of personal data processing. Personal data that is stored in Euro Accident's backups is encompassed, like other processing, by the rules relating to thinning out, which means that even personal data in Euro Accident's backups must also be erased after a certain period. When it is impossible in practice to thin out backups, primarily not by 25 May 2018, Euro Accident has chosen to – as an interim measure – find mitigating solutions that, so to speak, are the next best solution. Euro Accident restricts the physical access to and authorisation to obtain data from all backups to prevent dissemination of personal data that should have been erased.

## Your rights in your capacity as data subject

You can refer to Euro Accident at any time to request access to and get information about what personal data about you is being processed, rectify any inaccurate data, request that the personal data is erased, restrict the processing of personal data, and thereby request in writing that the data may not be used for direct marketing purposes, object to the processing of personal data, or ask to be able to move personal data ('right to data portability'). Euro Accident may be contacted at [dataskyddsbud@euroaccident.com](mailto:dataskyddsbud@euroaccident.com) for such a request. A description of each right is provided below.

### Right to obtain access to your personal data

As a data subject, you have the right to obtain access to information about your personal data that is registered and processed by Euro Accident. Such a request shall be presented to Euro Accident by post or email. Such information is provided free of charge. Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, Euro Accident may charge a reasonable fee to cover the administrative costs of providing the information or communication or taking the measure requested, or refuse to act on the request. If the request is presented in an electronic form, the information shall be provided, if possible, in an electronic form, unless you request otherwise. As regards processing performed for the medical advisory service and also for the drawing up of records, you also have the right to obtain information about the direct access or electronic access to data about you that exists.

### Right to rectification

You have the right to request that Euro Accident rectifies inaccurate or incomplete information about you. You also have the right to have incomplete personal data about you completed, among other things, by providing a supplementary statement.

### Right to be erased ('right to be forgotten')

You have the right to request erasure of your personal data if:

- your personal data is no longer necessary in relation to the purposes for which it was collected
- you withdraw your consent and there is no other legal ground for the processing
- you object to your personal data being processed for direct marketing
- you object to the processing and there are no legitimate grounds to continue the processing
- the personal data has been unlawfully processed

However, the right to be forgotten does not apply if Euro Accident's processing is necessary to comply with a legal obligation that requires the processing of your personal data or alternatively the processing is necessary to be able to establish, exercise or defend legal claims. In these situations, Euro Accident blocks the personal data, which Euro Accident has the right to save, from being used for purposes other than to comply with a legal obligation or establish, exercise or defend legal claims.

### Right to restriction

If you are opposing the accuracy of the data that we have registered about you or the lawfulness of the processing of the data, or if you have exercised your right to object to the processing of the data, you can request that we restrict the processing of this data to just storage. The processing is then restricted to only relate to storage until rectification of the data has been performed, or until it is possible to establish that our legitimate interests override your interests.

If you do not have the right to erasure of the data that we have registered about you, you can instead request that the processing of this data is restricted to just storage. If the processing of the data that we have registered about you is

only needed to press a legal claim, you can also require that all other processing of this data is restricted to storage. We may process your data for other purposes if this is necessary to press a legal claim or if you have given your consent.

#### **Right to data portability**

You have the right to receive personal data that you have provided to us in a machine-readable format. This only applies to personal data that you have personally provided to Euro Accident and that is processed by automated means pursuant to consent or to perform a contract. If it is secure and technically possible, we can also transfer personal data to another controller.

#### **Right to object**

In certain situations, you have, in your capacity as data subject, the right to object at any time to the processing of your personal data, unless Euro Accident can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the processing is performed to establish, exercise or defend legal claims.

If your personal data is processed for direct marketing, you have the right at any time to object to the processing of personal data about you for such direct marketing, which includes profiling to the extent that this is linked to such direct marketing.

Your request to exercise your rights above is considered on the basis of the circumstances prevailing at any given time. Please note that we may also retain and use your data if it is needed to comply with legal obligations, press a legal claim or enforce our contracts.

#### **Complaints to the Swedish Data Protection Authority**

You always have the right to make a complaint to the Swedish Data Protection Authority or another relevant supervisory authority in the event that Euro Accident's processing of personal data does not comply with lawful requirements. You may be entitled to damages if personal data is processed in contravention of the General Data Protection Regulation or Swedish Patient Data Act (2008:355).

Email: [datainspektionen@datainspektionen.se](mailto:datainspektionen@datainspektionen.se)

### **How do we process your personal identity (ID) number?**

We will only process your personal identity (ID) number when clearly justified considering the purpose, when necessary for secure identification or if there is some other noteworthy reason. We always minimise the use of your personal identity (ID) number as far as possible by, in the event this is sufficient, using your birth registration number instead.

### **Contact details for questions about the processing of personal data**

If you have questions or comments relating to our processing of personal data, you are welcome to contact Euro Accident's insurance service.

The Euro Accident Group has also appointed a Data Protection Officer (*Dataskyddsbud*). You can email the Data Protection Officer at the address [dataskyddsbud@euroaccident.com](mailto:dataskyddsbud@euroaccident.com), or write a letter to Euro Accident Health & Care Insurance Aktiebolag, c/o Data Protection Officer, Svärdvägen 3 A, SE-182 33 Danderyd, Sweden.

You can also make a complaint or contact the data protection authority in any of the countries where we offer you products and services.

#### **Controller**

Euro Accident Health & Care Insurance Aktiebolag  
Corporate identity (ID) number: 556551-4766  
Bäckgatan 16, SE-352 31 Växjö, Sweden

**Data Protection Officer**

Euro Accident Health & Care Insurance Aktiebolag  
FAO Data Protection Officer  
Svärdvägen 3 A, SE-182 33 Danderyd, Sweden  
Telephone: +46 (0)8-562 916 14  
Email: [Dataskyddsbud@euroaccident.com](mailto:Dataskyddsbud@euroaccident.com)

**Supervisory authority**

Swedish Data Protection Authority  
Telephone: +46 (0)8 657 61 00  
Email: [datainspektionen@datainspektionen.se](mailto:datainspektionen@datainspektionen.se)  
Postal address: Box 8114, SE-104 20 Stockholm, Sweden

**Further information**

Please visit [www.euroaccident.se](http://www.euroaccident.se) for more information about Euro Accident and Euro Accident's processing of personal data.