

## I. Personal Data Protection

Data Controller: Zurich Insurance Europe AG, Branch in Spain (“the Company or Insurer”).

### Purposes and recipients of data processing:

#### 1. In the policy

The Insurer is subject to its own insurance regulations for the execution of the insurance contract, and, in such condition, acts as the data controller.

### Purpose of the processing of personal data in the policy

To manage the contract: personal data will be included in files belonging to Zurich Insurance Europe AG, Branch in Spain, and its parent Company Zurich Insurance Europe AG, for the purpose of entering into the contract, the execution, maintenance and control of the insurance contract, as well as for statistical, quality or technical analysis studies, managing coinsurance, reinsurance, where appropriate, and in the case of the parent Company, for any processing related to the prevention of money laundering and the financing of terrorism.

Legitimation: the execution of the contract and of the insurance regulations themselves, mainly Insurance Contract Law or the Law on the Management and Supervision and Solvency of Insurance and Reinsurance Entities, and regulations on the prevention of money laundering and the financing of terrorism.

Purpose of the processing for prevention of fraud: Likewise, your data or those of third parties will be used to prevent fraud.

Legitimation: Legitimate interest.

Likewise, unless you have objected, the Insurer may process your data: With the purpose of sending you commercial communications by any electronic means, including SMS, email or equivalent means of communication, for the offer, promotion and contracting of goods and services of the Insurance Entity and additional services included in the contracted insurance.

Legitimation: Legitimate interest and right of opposition. You can exercise such right at any time as indicated below in section “What rights do you have for protecting your data?”.

Purpose: Basic Profiling

Zurich Insurance Europe AG, Sucursal en España uses personal data to evaluate particular aspects about you, mainly to calculate the price of the insurance and adjust the renewal price based on your claims history in line with its underwriting policy.

Likewise, if we sent personalised messages or content (and you have not opposed to it), we may use techniques called “profiling”, that is to say any form of automated processing of personal data which consists of using that data to evaluate certain personal aspects of an individual. In particular we may use them:

- To send personalised messages that best suit your needs, situation and interests
- For internal purposes to manage these messages more efficiently and at the same time offer you a differential value proposition.

We also may profile to analyse product and service quality in relation to your level of satisfaction.

All of the above is defined as “profiling”. Remember that you have the right to object to your personal data being processed based on profiling in certain circumstances. Zurich does not use automated individual decision-making, in other words performing this type of profiling but in an automated way (without intervention by a human who might decide otherwise) and based on individualised information about the customer that might lead to adverse legal consequences for the person without their consent.

Legitimation: Legitimate interest and right of opposition. You can exercise such right at any time.

## 2. [Personal data of the representative \(natural person\) of the parties](#)

The representative (natural person) of each of the parties is notified herein that their personal data provided to execute this insurance contract will be processed by the other party in order to manage the contractual relationship.

Where appropriate, the Policyholder promises the Insurer that it has notified the interested party (Insured, beneficiary or of any other nature) with respect to any other personal data that this party has been able to provide it in the execution of the insurance contract prior to such notification, of the processing of its data in the terms provided for in this clause, and to have met any other requirements that are necessary to enable the legitimate communication of its personal data to the Insurer in accordance with applicable regulations.

The legal ground for such processing is the execution of the contract and insurance regulations, mainly Insurance Contract Law or the Insurance and Reinsurance Management and Supervision and Solvency Law.

Personal data shall not be communicated to third parties except for meeting any of the obligations contained in the applicable regulations, if applicable.

### 3. Third party data (groups or whenever lists with the personal data of physical persons are included)

Whenever the policy is formalised by the Policyholder for the benefit of a third party, the processing of the Insured party's/beneficiaries' personal data, including any health data, is legitimised by the existence of a contractual relationship making this necessary for the formalisation of the contract.

In this case, the Policyholder/Insured party contractually assumes the obligation to inform said third parties about the processing of their personal data by the Insurer and, where appropriate, must provide the Insurer with the duly signed application form. All of this must follow the same procedure established in Royal Decree 1060/2015 on the management, supervision and solvency of insurance and reinsurance entities with regard to prior insurance information. For further information, please see the Additional Information section.

#### Rights and additional information

**Rights:** the holder of the personal data (if a natural person) and the person concerned and the representative (if a legal person) are entitled to access, rectify, object to and delete the personal data, as well as other rights, as explained below.

How long does Zurich retain personal data for?

We inform you that Zurich has drawn up a data retention policy ("Zurich Data Retention Policy") in which the following retention periods are established in compliance with applicable regulations:

#### Offers

We will keep your personal data that we have collected in order to make you an offer for a Zurich product for sixty (60) days, in the event that it has not materialized in a contract.

During said period, the company undertakes to maintain the price offered, provided that it is not affected by variations in taxes or legal/tax surcharges.

The data will be deleted once said period has elapsed or as soon as possible in the event that you have exercised your right of cancellation before the end of the period and it corresponds.

#### Policies

In the event that the termination of your Zurich policies had occurred prior to October 7, 2015, we inform you that Zurich will keep your data for fifteen (15) years from the date of termination, being subsequently duly blocked in accordance with the regulations applicable for a period of three (3) years. However, for this type of policy, the maximum storage deadline will be October 7, 2020, with the data being deleted as of that date, whether or not the initial storage period established has elapsed.

If the termination took place on or after October 7, 2015, we will retain your data for a total of six (6) years from the date of unlinking, after which it will be appropriately locked for an additional three (3) years. (3) years, in accordance with applicable regulations.

#### Inquiries

The data that you provide us when contacting us to ask questions or queries about Zurich, will be kept only for the period of time necessary to give you an answer. In the event that you formulate the query by telephone, we inform you that, for reasons of evaluation and improvement of the quality of the service provided, the recording of the call may be kept for a maximum period of six (6) months.

Who can access the data? (Applicable for companies and individuals) We may share your personal data with:

1. Authorities or official bodies which we are legally obliged to notify, such as the Directorate General of Insurance and Pension Funds, the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences, SINCO, etc.
2. Files relating to compliance with or breach of monetary obligations in order to learn the data subject's creditworthiness.
3. Courts and law enforcement agencies if we are required to transfer personal data.
4. The Group's organisations in the insurance and pensions industry and third-party organisations in the insurance and pensions industry with which we have distribution or marketing network transfer agreements as set out above, and only in cases where the data subject has agreed to such data transfer or based on a legitimate interest.

Your insurance contract has been distributed by a broker (which is also a Data Controller in Spanish Regulation). In order to normally manage the contract, your broker shall send us your personal information and the Insurer shall also inform the broker to fulfil the insurance contract.

Likewise, in the performance of the contract your personal data may be disclosed to reinsurers, co-insurers and other participants in the contract's operations such as repairers, loss adjusters, etc.

Your personal data may also be processed on our behalf by our service providers. Zurich selects its providers based on European quality standards and only gives them the information they need to perform the service. We also require them not to use your personal data for any other purpose. We always do our best to ensure that all third parties with which we work maintain the security of your personal data. Zurich does not sell your personal data. In the following table you can see the main categories of third-party service providers which require access to your personal data broken down by the company's in-house unit which may require the service provision:

- Providers that support platforms and information systems which may consist of computer consulting services, licensing, infrastructure support, maintenance services or telecommunications services.
- Claims: providers that support claims handling such as legal and advisory services, medical services, etc
- Marketing and communications: providers that support sending group messages, whether digital or physical, graphic and audiovisual design, communication agencies, event organisation services, etc.
- General services: support for the custody of documentation, digitisation or trusted third parties, printing, etc

## International transfers

The Personal Data we collect may be transferred to, accessed from, and stored at a destination outside of the European Economic Area ("EEA"). They may also be processed by staff members operating outside the EEA who work for us or for one of our service providers.

Zurich makes international transfers only when based on suitable contracts (based on the standard data protection contractual clauses of the template adopted by the EU Commission).

Specifically, in the event of a claim, when the sale occurs on Amazon America (USA), the claim management will be carried out by our service providers who support us and who act as data processors. For this reason, we inform you that the management and, therefore, the associated personal data (such as the policyholder or the injured party) will be processed by our treatment manager. To this end, Zurich has signed the standard data protection contractual clauses adopted by the European Commission for international transfers.

## What rights do you have for protecting your data?

The data subject may exercise their right to access, rectify and erase data and other rights as shown in the table below:

Rights	Content	Service channels
Access	You can view your personal data stored in files owned by Zurich Insurance Europe AG, Sucursal en España	protección de datos@zurich.com or at: C/Acanto 22,2nd floor, 28045 Madrid
Rectification	You can modify your personal data when they are inaccurate.	
Erasure	You can ask us to delete your personal data	
Objection/opposition	You can oppose to certain processing of data	
Restriction	You can ask to restrict our processing of your personal data in the following cases: <ul style="list-style-type: none"> <li>• While verifying the accuracy of your data when you contest it.</li> <li>• When the treatment is unlawful, but you object to the</li> </ul>	

	<p>erasure of your data. • When Zurich Insurance Europe AG, Sucursal en España no longer needs to process your data but you need them to exercise or defend legal claims. • When you have objected to the processing of your data for the performance of a task in the public interest or to meet a legitimate interest pending verification whether our legitimate grounds for the processing override yours.</p>	
<p>Portability</p>	<p>You may receive in an electronic format the personal data you have supplied to us and any gathered in your contractual relationship with Zurich Insurance Europe AG, Sucursal en España and also transmit them to another organisation.</p>	

If you believe that we have not processed your personal data in accordance with the regulation, you can contact our Data Protection Officer at [esz\\_dpd@zurich.com](mailto:esz_dpd@zurich.com).

You may also make a complaint to the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)).

In addition you can withdraw your consent at any time without this affecting the processing request by emailing: protecciondatos [protecciondatos@zurich.com](mailto:protecciondatos@zurich.com) or writing to: Acanto 22, 2<sup>nd</sup> floor, 28045 Madrid.

All the information can be consulted at: [www.zurich.es/rgpd](http://www.zurich.es/rgpd).