

## Privacy Notice (Policy Self-service portal)

### INFORMATION ON THE PROCESSING OF PERSONAL DATA OF USERS OF THE PORTAL, IN APPLICATION OF THE GENERAL REGULATIONS ON DATA PROTECTION

On the 25<sup>th</sup> of May 2018, the General Data Protection Regulation (GDPR) came into force. These regulations govern the processing of personal data carried out in the context of the activities of an establishment of a controller or processor on the territory of the European Union.

#### **We care about your personal data**

The term “Allianz Assistance”, “our”, “us” or “we” refers to the owner of the website, AWP Assistance UK Ltd which is registered in England No. 1710361, Registered Office PO Box 74005, 60 Gracechurch Street, London, EC3P 3DS. AWP Assistance UK Ltd is authorised and regulated by the Financial Conduct Authority for insurance mediation on non-investment insurance contracts. The term “you” refers to the user or viewer/user of our website.

Protecting *your* privacy is a top priority for *us*. This privacy notice explains how and what type of personal data will be collected, why it is collected and to whom it is shared or disclosed. Please read this notice carefully.

This privacy notice explains what type of personal data will be collected, how and why it is collected and to whom it is shared or disclosed.

Please read this notice carefully and share it with any members covered under your policy.

## 1. Who is the Data controller?

A data controller is the individual or legal person who controls the use of the data and is responsible for keeping it safe. The laws apply to personal data in both paper and electronic files. AWP Assistance UK Ltd is the data controller as defined by relevant data protection laws and regulations.

## 2. What personal Data will be processed?

We will (or may) collect, retrieve, process and display various types of personal data about you, other persons and third parties affected by a covered event such as:

Personal Information of the Policyholder or Insured Persons:

- Title
- Surname, first name
- Date of birth
- Gender
- Address
- Contact details (Email Address, phone number)
- Identification Document Number
- Language
- Credit/debit card and bank account details

- Flight and travel plans
- Location

Depending on the claim submitted, we may also collect and process additional personal data including, sensitive personal data about you, other persons and third parties affected by covered events, such as:

- Medical conditions (physical and/or psychological)
- Medical history and reports
- Medical claims history
- Documentation justifying sick leaves and duration
- Death Certificates
- Details of the claim (e.g. travel booking details or references, details of expenses, visa details, etc)
- Phone number and contact details if not provided previously
- Location data
- Bank account details
- Passport and Biometric Data

Some of which may be required for fraud detection purposes.

### 3. How will we obtain and use your personal data?

We will collect and use the personal data that you provide to *us* and that *we* receive about *you* (as explained below) for a number of purposes and with *your* express consent unless applicable laws and regulations do not require *us* to obtain your express consent, as shown below:

Purpose	Is your express consent required?
<ul style="list-style-type: none"> <li>• Insurance contract quotation and underwriting</li> </ul>	<ul style="list-style-type: none"> <li>• No, to the extent these processing activities are necessary to perform the insurance contract to which <i>you</i> are a party to and to take the necessary steps previous to enter in this contract</li> </ul>
<ul style="list-style-type: none"> <li>• Insurance contract administration (e.g., claims handling, handling of complaints, necessary investigations and assessments in order to determine the existence of the covered event and the amount of the compensations to be paid, or the kind of assistance to be provided, etc)</li> </ul>	<ul style="list-style-type: none"> <li>• We will request your express consent on the occasion of claims requiring necessarily the processing of the following categories of data: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation, criminal convictions or offences</li> </ul> <p>However, we will be entitled to process this data without consent if (1) there is a vital</p>

	<p>interest of the owner of the data or any other natural person, and (2) if the owner of the data is not physically or legally capable to give the consent (e.g emergency situations)</p> <ul style="list-style-type: none"> <li>• If the handling of the claim does not require the processing of those categories of data, we will not be required to collect your consent, to the extent that they are necessary to comply the obligations we undertake in the insurance contract.</li> </ul>
<ul style="list-style-type: none"> <li>• To conduct quality surveys about the services provided, with the purpose to assess your level of satisfaction and to improve them.</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legitimate interest to contact you after handling a claim or after providing assistance to ensure we have complied with our obligations under the contract in a satisfying way for you. However, you have the right to object by contacting us as explained in section 9 below.</li> </ul>
<ul style="list-style-type: none"> <li>• To perform statistical and quality analysis on the basis of aggregated data, as well as claims rate.</li> </ul>	<ul style="list-style-type: none"> <li>• If we carry out any of these processing activities, we will do so by aggregating and anonymizing data. As a result, the data is not considered "personal" data anymore and your consent is not required.</li> </ul>
<ul style="list-style-type: none"> <li>• To meet any legal obligations (e.g. those arisen from laws on civil, commercial and insurance contracts and insurance business activities, regulations on tax, accounting and administrative obligations, to prevent money laundering or for the purposes of sanction screening i.e. to check whether you, your country or your sector are subject to sanctions impeding or restricting us to make payments if relevant).</li> </ul>	<ul style="list-style-type: none"> <li>• No, to the extent these processing activities are expressly and legally authorized.</li> </ul>
<ul style="list-style-type: none"> <li>• Fraud prevention and detection, including, when appropriate, for example, comparison of your information with previous service requests and/or previous claims, or checking of common claims filing systems.</li> </ul>	<ul style="list-style-type: none"> <li>• No, it is understood that the detection and prevention of fraud is a legitimate interest of the Data Controller and therefore we are entitled to process your data for this purpose without collecting your consent.</li> </ul>
<ul style="list-style-type: none"> <li>• Audit purposes, to comply with legal obligations or internal policies</li> </ul>	<ul style="list-style-type: none"> <li>• We can process your data in the framework of internal or external audits either required by law, or by internal policies. We won't request your consent for these processing to the extent that they are legitimated by the applicable regulations or our legitimate interest. However, we will ensure that only the strictly necessary personal data</li> </ul>

	<p>are used, and treated with absolute confidentiality.</p> <p>Internal Audits are usually conducted by our holding company, Allianz Partners SAS (7 Rue Dora Maar, 93400 Saint-Ouen, France)</p>
<ul style="list-style-type: none"> <li>To administer debt recoveries (e.g. to claim the payment of the premium, to claim third parties liabilities, to distribute the compensation amount between different insurance companies covering the same risk)</li> </ul>	<ul style="list-style-type: none"> <li>No when the processing of your data, even special categories of personal information (racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation, criminal convictions or offences) may be necessary for the establishment, exercise or defence of legal claims, which is also our legitimate interest.</li> </ul>
<ul style="list-style-type: none"> <li>To inform you, or permit Allianz Group companies and selected third parties to inform you, about products and services we feel may interest you in accordance with your marketing preferences, You can change these at any time by the links we will make available in every communication to unsubscribe, by means of the options in your client portal, where available, or by contacting us as specified in section 9 below.</li> </ul>	<ul style="list-style-type: none"> <li>We will process your personal information for these purposes only if authorized by law (and within the limitations and by complying the requirements of those legal authorizations) or by collecting your express consent after providing you information about criteria we use to make the profiles and the impact/consequence and benefits of such profiling for you.</li> </ul>
<ul style="list-style-type: none"> <li>To personalize your experience on our websites and portals (by presenting products, services, marketing messages, offers, and content tailored to you) or by using computerised technology to assess which products might be most suitable for you. You will be able to modify these processing activities by using the options available in your browser (e.g. in the case of use of cookies and similar devices) or by contacting us as specified in section 9 below.</li> </ul>	<ul style="list-style-type: none"> <li>We will ask for your consent</li> </ul>
<ul style="list-style-type: none"> <li>For automated decision making, i.e., to make decisions that (1) are based solely on automated processing and (2) that may have legal or significant effects to you. Examples of automated decisions resulting in legal effects could be the automated cancellation of a contract, or automated denial of a claim, those affecting your rights under the insurance contract, etc</li> </ul>	<ul style="list-style-type: none"> <li>We will collect your consent for this processing activities when applicable, in particular if the data concerned are special personal data (racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation, criminal convictions or offences)</li> </ul>

<p>Example of automated decisions resulting in similar significant effects are those that affect to your financial circumstances like an automated denial of an insurance policy, or those affecting your access to our health assistance services.</p>	<ul style="list-style-type: none"> <li>• If no special categories of personal data are concerned and these decisions are in order to underwrite your insurance and/or process your claim we will not need to obtain your express consent.</li> </ul>
<ul style="list-style-type: none"> <li>• To redistribute risks by means of reinsurance and co-insurance</li> </ul>	<ul style="list-style-type: none"> <li>• We can process and share your personal information with other insurance or reinsurance companies with whom we have signed or we will sign co-insurance or re-insurance agreements.</li> </ul> <p>Co-insurance is the coverage of the risk by several insurance companies by mean of a single insurance contract, assuming each of them a percentage of the risk or distributing the coverages between them.</p> <p>Reinsurance is the "subcontracting" of the coverage of part of the risk in a third reinsurance Company. However, this is an internal agreement between us and the reinsurer and you don't have a direct contractual relationship with the latter.</p> <p>These distribution of risks are legitimate interest of Insurance Companies, even usually expressly authorized by law (including the sharing of personal data strictly necessary for it)</p>

As mentioned above, for the purposes indicated above, we will process personal data we receive directly from you and/or personal data we receive about you from business partners, public data bases, third party providers, other insurance companies, insurance intermediaries and distributors (travel agencies, tour operators, manufacturers,...), healthcare assistance services or contact persons you authorize, fraud prevention agencies and investigators, advertising networks, analytics providers, search information providers, loss adjustors, surveyors, lawyers, finance companies and delegated authorities.

We will need your personal data if you would like to purchase our products and services and make use of the benefits and/or services provide by us. If you do not want to provide this personal data including sensitive personal data to us, we may not be able to provide the products, benefits and/or services you request, that you may be interested in, or to tailor our offerings to your particular requirements.

## 4. Who will have access to your personal data?

We will ensure that your personal data is processed confidentially, on a need-to know basis, and in a manner that is compatible with the purposes indicated above.

For the stated purposes, *your* personal data may be disclosed to the following parties who operate as third party data controllers:

- Public authorities, other Allianz Partners and Allianz Group companies (e.g. for audit purposes), other insurers, co-insurers, re-insurers, insurance intermediaries/brokers, banks, third parties collaborators and partners participating in the provision of the services such as healthcare services and professionals, including doctors, travel agencies, airlines, taxi companies, repairers, fraud investigators, loss adjusters, lawyers and independent experts, etc.

For the stated purposes, we may also share *your* personal data with the following parties who operate as data processors, i.e., processing the data under our instructions, and subject to the same obligations of confidentiality, need-to-know and compatibility with the purposes described in this Privacy Notice:-

- Other Allianz Partners and Allianz Group companies, or third party companies acting as subcontractors of internal activities (e.g. providers of IT support and maintenance, tax management companies, companies providing *claims* handling services, postal providers, document management providers), technical consultants, surveyors (*claims*, IT, postal, document management), experts, loss adjusters and service companies to discharge operations; and
- Advertisers and advertising networks to send *you* marketing communications, as permitted under local law and in accordance with your communication preferences. *We* do not share *your* personal data with non-affiliated third parties for their own marketing use without your permission.

Finally, *we* may share *your* personal data in the following instances:

- In the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of *our* business, assets or stock (including in any insolvency or similar proceedings; and
- To meet any legal obligation, including to the relevant ombudsman or supervisory authority if *you* make a complaint about the product or service we have provided to *you*.

## 5. Where will my personal data be processed?

Your personal data may be processed both inside and outside of the United Kingdom (UK) and the European Economic Area (EEA), by the parties specified above, subject always to contractual restrictions regarding confidentiality and security in line with applicable data protection laws and regulations. We will not disclose your personal data to parties who are not authorized to process them.

Whenever we transfer your personal data for processing outside of the UK and the EEA to another Allianz Group company, we will do so on the basis of Allianz' approved binding corporate rules known as the Allianz Privacy Standard (Allianz' BCR) which establish adequate protection for personal data and are legally binding on all Allianz Group companies. Allianz' BCR and the list of Allianz Group companies that comply with them can be accessed here <https://www.allianz-partners.com/content/dam/onemarketing/awp/azpartnerscom/legal-and-compliance-docs/Allianz-Privacy-Standard-EN.pdf>. Where Allianz's BCRs do not apply, we will instead take steps to ensure that the transfer of your personal data outside of the UK and the EEA receives an adequate level of protection as it does in the UK and the EEA. You can find out what safeguards we

rely upon for such transfers (for example, Standard EU Model Contractual Clauses) by contacting us as detailed below.

## 6. How long do we keep your personal data?

We will retain *your* personal data only for as long, and deleted or anonymized when no longer required. Here below we inform *you* of some of the retention periods applicable to the purposes informed in section [3] above.

However, please be aware that sometimes additional specific requirements or events may override or modify them, such as ongoing legal holds over relevant information, or pending litigation or regulatory investigations, which may supersede or suspend these periods until the matter has been closed, and the relevant period to review or to appeal has expired. In particular, retention periods based on specified periods for legal *claims* can be interrupted and then start to run again.

Personal information to obtain a quotation (when necessary)	During the validity period of the quotation provided
Policy Information (underwriting, <i>claims</i> handling, management of complaints, litigation cases, quality surveys, fraud prevention/detection, debt recoveries, co-insurance and re-insurance purposes,...)	<p>We will keep the personal information of <i>your</i> Insurance Policy during the validity period of <i>your</i> insurance contract and the prescription period determined by the local applicable laws on insurance contracts.</p> <p>In case we realize of information omitted, false or inaccurate in the declaration of the risk to be covered, the above retention periods would count from the moment we are aware of it.</p>
<i>Claims</i> Information ( <i>claims</i> handling, management of complaints, litigation cases, quality surveys, fraud prevention/detection, debt recoveries, co-insurance and re-insurance purposes)	We will retain the personal information <i>you</i> provide to <i>us</i> or we collect and process according to this privacy notice for the prescription period determined by the local applicable laws on insurance contracts.
Marketing information and related profiling	<p>We will keep this information whilst <i>your</i> insurance policy period is still valid, and one additional year, unless <i>you</i> withdraw <i>your</i> consent (when required), or <i>you</i> object (e.g. in the event of marketing activities authorized by law <i>you</i> don't want to receive).</p> <p>In these cases we will no longer process <i>your</i> data for these purposes, although we may legitimately keep some information to prove the previous processing activities were lawful.</p>
Debt Recoveries	We will retain the personal information that we need to <i>claim</i> and administer debt recoveries, and

	that <i>you</i> have provided to <i>us</i> , or <i>we</i> may have collected and processed in accordance with this Privacy Notice, for a minimum term determined by the prescription periods set up by applicable laws. As a reference, for civil actions, <i>we</i> will keep <i>your</i> data for a minimum of 7 years
Supporting documents to provide evidence of compliance with legal obligations such as tax or accounting	<i>We</i> will process in these documents the personal data <i>you</i> provide to <i>us</i> , or <i>we</i> collect and process according to this Privacy Notice, only to the extent they're relevant for this purpose, and for a minimum of 10 years from the first day of the relevant tax year

*We* will not retain *your* personal data for longer than necessary and *we* will hold it only for the purposes for which it was obtained.

## 7. What are your rights in respect of your personal data?

Where permitted by applicable law or regulation, and within the scope therein defined, , you have the right to:

- Access your personal data held about you and to learn the origin of the data, the purpose and ends of the processing, the details of the data controller(s), the data processor(s) and the parties to whom the data may be disclosed;
- Withdraw your consent at any time where your personal data is processed with your consent;
- Update or correct your personal data so that it is always accurate;
- Delete your personal data from our records and systems if their retention is no longer necessary for the purposes indicated above, subject to regulatory personal data retention requirements;
- Restrict the processing of your personal data in certain circumstances, for example, if you have challenged the accuracy of your personal data, for the period necessary to verify its accuracy
- Obtain your personal data in an electronic format for your or for your new insurer;
- Exercise your right to data portability;
- File a complaint with us and/or the relevant data protection authority. For this purpose, relevant data privacy authorities are:
  - The supervisory authority of the country where you are resident;
  - The supervisory authority of the country where the insurer has a branch established; CNIL, French data privacy supervisory, to the extent that France is the country where Allianz Partners has its main establishment, and therefore our lead data privacy authority.

You can exercise these rights by contacting us as set out in the section below, providing your name, email address, account identification and the purpose of your request

## 8. How can you object to the processing of your personal data?



Where permitted by applicable law or regulation, you have the right to object to us processing your personal data or tell us to stop processing it (including for purposes of direct marketing). Once you have informed us of this request, we shall no longer process your personal data unless permitted by applicable laws and regulations.

You may exercise this right in the same manner as for your other rights indicated in section above.

## 9. How can you contact us?

If *you* have any queries about how *we* use *your* personal data, *you* can contact *us* by email or post as follows:

By Post:

Customer Service (Data Protection)

AWP Assistance UK Ltd

102 George Street

Croydon CR9 6HD

By Email:

[AzPUKDP@allianz.com](mailto:AzPUKDP@allianz.com)

*You* can also use these contact details to exercise your rights, or to submit *your* queries or complaints to other Allianz Partners entities acting as controllers (see section 4 above) to which we may have shared *your* personal data. *We* will address them your request and support their handling and answer to *you* in our local language.

## How often do we update this privacy notice?

We regularly review this Privacy Policy.

This Privacy Policy was last updated in 21<sup>st</sup> November 2022