



## Privacy information

Status June 2023

Fortuna Life Insurance Ltd (hereinafter referred to as Fortuna) is well aware of the value of your personal data. With the following instructions, we inform you about the processing of your personal data by Fortuna and the rights to which you are entitled.

Please take note of the following privacy policy.

### Person responsible for data processing

The person responsible for the processing of your data is the

Fortuna Life Insurance Ltd.  
Städtle 35  
9470 Vaduz  
Liechtenstein

You can contact our data protection officer by e-mail at [privacy@fortuna.li](mailto:privacy@fortuna.li) or by mail at the above address with the address suffix "Data Protection Officer".

### Purposes and legal bases of data processing

We process your personal data in compliance with all relevant data protection regulations. Below you will find more detailed general information on how we process your data.

Your data is processed primarily for the purpose of concluding and processing contracts with you. If you submit an application for insurance coverage, we require the information you provide for the conclusion of the contract and for the assessment of the risk to be assumed by us. If the insurance contract is concluded, we process this data in order to implement the contractual relationship, for example, for policy issuance and invoicing. We need information about the damage, for example, in order to be able to check whether an insured event has occurred and how high the damage is. If necessary, this may also include information from third parties who have been commissioned to determine the damage and benefits (experts), who can provide information on this (authorities, witnesses, etc.) or who are connected with the damage and benefits (doctors, hospitals). For this purpose, we may also access data about you from public sources (Internet sites, social media, etc.).

If health data is indispensable for assessing whether and under which conditions your insurance contract should be concluded, we will, subject to your consent, also determine the health data required for assessing the contract in part by obtaining information and documents from examining or treating physicians, hospitals, other health care or preventive health care institutions and social insurance carriers.

We also process your personal data to compile insurance-specific statistics and analytical evaluations, in particular to meet regulatory requirements.

The legal basis for this processing of personal data for contractual purposes is Art. 6 (1) b) DSGVO. If special categories of personal data (e.g. your health data) are required for this purpose, we will obtain your consent in accordance with Art. 9 (2) a) in conjunction with Art. 7 DSGVO. If we create statistics with these data categories, this is done on the basis of Art. 9 (2) j) DSGVO. Uniform consent can be revoked at any time.

In addition, we process your personal data beyond the actual performance of the contract in order to protect legitimate interests of us or third parties. This may be necessary in particular (examples):



- to ensure IT security and operations and to protect our employees and assets,
- to optimize our internal processes,
- to anonymize the data, e.g. to create statistics from it,
- to determine creditworthiness and default risks,
- for corporate governance and in the context of restructurings and transactions,
- for the enforcement and defense of legal claims, the prevention and investigation of criminal offenses, in particular data analyses to identify indications that may point to insurance fraud, and the prevention of money laundering and terrorist financing.

In addition, we need your personal data to fulfill legal obligations, such as regulatory requirements, commercial and tax retention obligations, or our obligation to provide advice.

Should we wish to process your personal data for a purpose not mentioned above or on other legal bases, we will inform you of this where necessary.

Within the scope of your business relationship, you will have to provide those data that are necessary or legally required for the establishment and execution of our contractual relationship. Without this data, we will generally not be able to conclude or execute the contract with you.

### **Categories of recipients of personal data**

Due to the complexity of today's data processing, we sometimes use service providers and appoint them to process your data or give them access to it. Some of these service providers may be located outside the European Economic Area (EEA), in principle worldwide, but in particular wherever branches of our group of companies are located. However, when using service providers, we generally ensure that the relevant data protection regulations and data security standards are maintained. It may also be necessary to transfer your data within our insurance company or within our group or to process it jointly.

#### Involvement of reinsurers

When insuring certain risks, we work closely with our reinsurers, who support us in our risk and benefit assessment. For this purpose, it is necessary for us to exchange data about you and your insurance relationship with our reinsurers. This exchange of data takes place solely for the purpose of jointly reviewing your insurance risk and your claims, in compliance with the framework provided for this purpose by the German Insurance Contract Act (Versicherungsvertragsgesetz).

#### Involvement of intermediaries

You will be served by agents in your insurance matters.

For the purpose of providing support and advice, the intermediary collects and processes the personal application, contract and claims data required for the conclusion and performance of the contract. Fortuna also transfers the aforementioned data about you and your insurance relationship to your intermediary, insofar as the intermediary requires this information for your support and advice.

#### Disclosure of data to supervisory authorities and courts as well as to other third parties

As an insurance company, we are subject to strict regulatory requirements and constant supervision by the authorities. As a result, we may have to disclose personal data of our policyholders or insured persons to authorities, courts, auditors, etc. as part of their statutory duties in response to their requests. Likewise, when examining your claim, we may have to involve third parties such as doctors, hospitals, appraisers, lawyers or companies commissioned to settle claims or companies that provide creditworthiness information, and we may have to disclose your personal data to them. In all these cases, however, we always ensure that the legal basis is observed.

#### Data processing within the group

In order to provide comprehensive insurance coverage, certain services of Fortuna are partly provided by legally independent companies in Germany and abroad. These may be specialized Group companies



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of the Generali Group or cooperation partners of Fortuna. In the context of the purpose of the contractual relationship, Fortuna relies on the transfer of data both within and outside the Group.

#### External service providers and foreign transfers to certain third countries

Due to the complexity of today's data processing, we sometimes use service providers and appoint them to process your data or give them access to your data for a specific purpose. In particular, your personal data may be disclosed to contracted third parties acting for us or on our behalf so that they are able to further process the data in accordance with the purpose for which it was originally collected or for another legally or contractually permissible use. Fortuna may also outsource business areas, individual value-added steps of the same and/or services (e.g., performance processing, information technology, contract administration, product development) in whole or in part to third parties in Switzerland and abroad. We may also share personal data with branches or companies of the Generali Group. All these contracted third parties have clear instructions so that your personal data is only processed for the agreed purposes.

We are part of the successful Generali Group and therefore handle certain business processes partly in central service units and data processing systems of the Generali Group.

Furthermore, it may be necessary within the framework of our business case that we transfer or jointly process your data within our insurance company or within our group of companies. Your data may also be disclosed to other responsible parties or cooperation partners.

If data is transferred to a country without adequate data protection, we ensure adequate protection by using sufficient contractual safeguards, namely on the basis of the EU standard contractual clauses, Binding Corporate Rules, or we rely on the exception of consent, the performance of the contract, the establishment, exercise or enforcement of legal claims, overriding public interests, the fact of publication of data or because it is necessary to protect the integrity of the data subjects. You may obtain a copy of the contractual safeguards from the contact points mentioned above or learn where such a copy may be obtained. We reserve the right to blacken such copies for reasons of data protection or confidentiality.

#### Application

When you apply for a vacant position with us, we process your data for the purpose of conducting the application process. Without this data, we are not able to assess your application and decide whether you are suitable for the position in question.

For example, we use your contact data to arrange appointments with you. We collect personal information, such as that contained in your resume, and process data from job references or training diplomas. In addition to this absolutely necessary data, you have the option of providing us with additional information for the application process. We use the data provided to us to assess the application and make decisions.

Your application data will be analyzed and evaluated on the basis of the information provided (not automated). To complete the picture, references can also be obtained (according to your contact details) or social media profiles can be consulted (e.g. LinkedIn).

Your application data will only be shared with persons involved in the application process, such as recruiting managers or supervisors. In addition, your data may be disclosed to authorities if there is a corresponding legal obligation to disclose.

Processing is permitted within the scope of recruiting. The data is generally deleted 6 months after the end of the application process.

If your application is followed by the conclusion of an employment contract, the data will continue to be stored and used for the usual organizational and administrative process and for the implementation of the employment relationship. More details will be provided in your employment contract documents.

#### Data procurement

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#### **Fortuna Life Insurance Ltd.**

A member of the Gruppo Assicurativo Generali, entered in the Italian Register of Insurance Companies under number 026.

Our data protection provisions can be viewed at [fortuna.li/en/dataprotection](https://fortuna.li/en/dataprotection), or you can request a copy from our customer service department.



Personal data is primarily collected directly from you. Only provide us with correct data and ensure that you are authorized to disclose the data to us.

In certain cases, we collect your data from third parties or receive your data from third parties or public bodies and process it in compliance with legal requirements.

### Automated data processing

In order to offer you the most efficient business case processing possible, we use partially automated check programs which determine the insurance risk on the basis of your information in the insurance application, decide on the conclusion of the contract and, for example, determine the amount of your insurance premiums or your possible risk exclusions. We also use such programs to automatically determine our obligation to pay benefits in the event of a claim. Depending on the business case, special categories of personal data or personal data requiring special protection, including health data, may also be processed as part of this automated data processing. The test parameters used in these programs are based on actuarial experience and thus ensure an objective standard of assessment.

### Processing of data of persons who do not have a contractual insurance relationship with us

In order to establish an insurance relationship, it may be necessary for us to also process data of persons who are not party of a contract. For example, we process personal identification data (name, date of birth) of persons named as beneficiaries. This is necessary in order to be able to provide the agreed insurance payment to the beneficiary after the occurrence of the insured event.

If the contract also includes insurance coverage for persons other than the policyholder, we also process their data. We require this data in order to be able to design insurance coverage tailored to the life situation of the insured person, but also in order to be able to provide the agreed insurance benefits in favor of the insured person or beneficiary in the event of a claim.

If an insured event occurs, we process data of third parties, e.g. the injured party, the tortfeasor, other parties involved in the incident or witnesses. The processing of this data is necessary to establish the facts of the case and to assess whether and to what extent an insurance benefit is to be paid. However, we also need the data to enforce the law (e.g. assertion of claims for damages or recourse) or to defend against legal claims (e.g. defense against unjustified claims).

Furthermore, we also process the personal data of any creditors, legal representatives, agents for service of process and other recipients of documents as well as - insofar as relevant for the performance of the insurance contract - the personal data of experts and attorneys.

Insofar as we receive the data of these third parties from you, we ask you to make these persons aware of the data processing by us, to draw their attention to this data protection declaration and, if necessary, to ensure their consent before they give us the data. The data subject rights listed in this data protection declaration also apply to these third parties.

### Duration of data retention

We process and store your personal data as long as it is necessary for the fulfillment of our contractual and legal obligations or the purposes pursued with the processing, i.e., for example, for the duration of the entire business relationship (from the initiation, processing to the termination of a contract) and beyond that in accordance with the statutory retention and documentation obligations. In this context, personal data may be retained for the time during which claims can be asserted against our company (e.g. during the statute of limitations period) and to the extent that we are otherwise obligated to do so or legitimate business interests require it (e.g. for evidence and documentation purposes). As soon as your personal data is no longer required for the above-mentioned purposes, it will generally be deleted.

### Data subject rights

You can request information about the data stored about you at the above address. In addition, you may, under certain conditions, request the correction or deletion of your data. Furthermore, you may



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have the right to restrict or object to the processing of your data and the right to demand the return of the data you have provided. If you have given us consent for the processing of data, you may withdraw this consent at any time with effect for the future.

For all your concerns, we ask that you contact us at the contact address shown above, always requesting proof of your identity, such as by submitting an electronic copy of your ID.

You have the option of contacting the above-mentioned data protection officer or a data protection supervisory authority with a complaint. The data protection supervisory authority responsible for us is:

Data Protection Office Principality of Liechtenstein  
Städtle 38  
P.O. Box 684  
FL-9490 Vaduz  
T +423 236 60 90  
info.dss@llv.li

### **Right to information**

You have the right to request information from us as to whether and which of your data we process. You can submit your request for information to our data protection advisor in writing or by e-mail, enclosing a copy of your identity card or passport (unless your identity is otherwise clear or you can be identified).

### **Right of objection**

If we process your data to protect legitimate interests, you can object to this processing with effect for the future if reasons arise from your particular situation that speak against the data processing. You may object to the processing of your personal data for direct marketing purposes at any time without giving reasons with effect for the future. The objection can be made without formalities and is to be addressed to the data controller named above.

### **Data deletion**

You have the right to request the deletion of data that is not absolutely necessary for the performance of the contract, that is not processed on the basis of an overriding interest on the part of Fortuna or a legal basis (e.g. retention obligations). If the deletion proves to be technically impossible or involves a disproportionate effort, we may reject your request for deletion.

### **Privacy policy update**

We may revise this General Privacy Policy from time to time. Any changes to this Privacy Policy will be communicated promptly on this and related websites.

Fortuna reserves the right to adapt this privacy policy at any time without prior notice, in particular to current legal requirements and changed business processes.

The last update of this privacy policy was on 01.06.2023.