Privacy policy

Information on data protection

Version 21st May 2025

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Privacy policy / information on data protection

Generali Switzerland is aware of the high value that your personal data enjoys. Therefore, we inform you transparently and recognizably with the following data protection declaration about the acquisition, processing and management of your personal data by Generali Switzerland and the rights to which you are entitled.

This description is not exhaustive; other data protection declarations or general insurance and business terms and conditions, conditions of participation and similar documents may govern further specific, data protection-relevant matters. In the following, personal data or personal data (hereinafter also referred to as "data") means all information that relates to an identified or identifiable natural person (e.g. name, date of birth, e-mail address, IP address). Information that is anonymized or aggregated and can no longer be used to identify a specific person is not considered data. Data processing includes any handling of personal data, e.g. obtaining, storing, using, disclosing, changing, archiving or deleting data. The legal basis and purpose for processing your data is primarily the initiation and/or fulfillment of insurance contracts as well as the settlement of claims and benefits. In addition, we base the processing of the data on the existence of a legal basis/legal obligation and/or (implicit or explicit) consent (by you or a person authorized by you) as well as on the overriding legitimate interest of Generali (i.e. in particular in order to pursue the purposes described and the associated objectives and to be able to implement appropriate measures).

If you wish to conclude a contract with us or use a respective service, you must truthfully provide us with all data required for the establishment and performance of the business relationship and for the fulfillment of the associated contractual obligations. Without this data we are not able to conclude a contract with you or to fulfill it or to pay services. Only provide us with correct data and ensure that you are authorized to disclose the data to us.

If you provide us with personal data of other persons (e.g. family members, data of work colleagues, etc.), please make sure that these persons are aware of this Privacy Policy and only share their personal data with us if you have been permitted to do so and if the personal data in question is correct.

The processing of your personal data is based on the principles of correctness, lawfulness, transparency, data minimization, proportionality, accountability and data security.

Offer of products and services of Generali

As a matter of principle, Generali offers its products and services only to customers with a company or domicile in Switzerland and only within Switzerland. For individual products, further restrictions may also apply in Switzerland.

If you are a person domiciled outside Switzerland and are interested in our products, we recommend that you contact a Generali Group representative in your area or contact one of our branches or subsidiaries via their website (generali.com).

Scope

Please take note of the following privacy policy. Our privacy policy is based on the requirements of the Swiss Data Protection Act (DPA) and, where applicable, the European General Data Protection Regulation (GDPR). Although the GDPR is a regulation of the European Union (EU) or the European Economic Area (EEA), it may also be relevant to Generali Switzerland in part for various reasons. In individual cases, further data protection information may regulate specific circumstances. There are exceptions to the obligation to provide information under data protection law: This obligation does not apply if the information is not possible or requires a disproportionate effort, if you are already informed about the data processing, if the processing is provided for by law or if we are legally obliged to maintain confidentiality.

Person responsible for data processing (controller)

The following persons are considered responsible for the processing of your data:

In connection with any insurance or pension law issues:
Generali Personal Insurance Ltd.
Soodmattenstrasse 2
8134 Adliswil
Switzerland

In connection with all insurance law issues:
Generali General Insurance Ltd.
Soodmattenstrasse 2
8134 Adliswil
Switzerland

In connection with legal expenses insurance:
Fortuna Legal Expenses Insurance Company Ltd.
Soodmattenstrasse 2
8134 Adliswil
Switzerland

In the context of innovative solutions:
HITS House of Insurtech Switzerland
Soodmattenstrasse 2
8134 Adliswil
Switzerland

In connection with our mortgages:
Generali Investments Switzerland Ltd.
Soodmattenstrasse 2
8134 Adliswil
Switzerland

You can contact our data protection advisor by e-mail at privacy.ch@generali.com or by mail at the above address with the address suffix “Data Protection Officer”.

Data categories and legal basis for data processing
Generali attaches great importance to the protection of your privacy and the confidentiality of your data during its processing, as well as when you visit our websites.

When processing your personal data, we comply with the respective applicable regulations of Switzerland, the EU and other applicable local laws governing the storage, processing, access and transfer of personal data. To protect our customer and personal data, Generali has adopted internal data protection policies. It is ensured that the employees of Generali are trained about the content of the regulations. Risk-based controls are in place to check adherence to the defined rules

The processing of your personal data is indispensable for insurance, pension and/or financial advice according to your needs. The conclusion or the administration and processing of an insurance or mortgage contract is not possible without the processing of your data. We primarily process the personal data that we receive from our customers and other business partners in the course of our business relationship with them and other persons involved, or that we collect from users in the operation of our websites, apps and other applications. In this context, your data is always used only for the purpose that was specified, for example, at the time of collection, for which you have consented, which is evident from the circumstances, where there is an overriding interest or is provided for by law / regulation.

The personal data processed by Generali includes personal data provided by you as well as publicly available personal data. The categories of data are:

- **Personal data and contact information:** This includes, but is not limited to: first and last name, gender, date of birth, age, marital status, languages, nationality, email address, home and correspondence addresses, telephone number, customer history, powers of attorney, health records, signature authorizations, consent forms. Family members, copies of IDs and forms, etc.;
- **Application data:** This includes information provided to us in the course of the application or registration for insurance , e.g. on the insured risk, information from the previous insurance company on the claims history, information on relationships with third parties affected by the data processing (e.g. main driver, beneficiaries), as well as the associated supplementary questionnaires (such as information from the applicant or the person to be insured on the insured risk). (e.g. main driver, beneficiary), as well as the associated additional questionnaires (such as information from the applicant or the person to be insured on the insured risk, answers to questions, expert reports, information from the former insurance company on the claims history to date);
- **Customer and contract data:** This is data that arises in connection with the conclusion or processing of a contract. This includes, for example, policy or contract number, contract term, type of insurance and coverage, insured risks, benefits, premium, method of payment, special conditions, insured vehicles, license plates, amount and rank of mortgage, liens on real property, debt certificate, registrations/deregistrations for newsletters, complaints, differences regarding benefits or the respective contracts concluded;
- **Collection Data:** This includes data such as the date and amount of premium receipts, outstandings, reminders, credit balances, payment connection data, charges, assignment data of leased vehicles;
- **Financial and payment data:** This includes, for example, creditworthiness, payment connection data, tax identification number, mortgage information such as interest rate and interest due date, premium receipts and outstanding payments, dunning notices, credit balances, charges;
- **Any claims/benefits and legal case data:** This includes data related to any claims or benefit settlements (such as notices of claim, medical reports, diagnoses, clarification reports, billing records, data regarding injured third parties, annuity dates, service provider invoices and reports, or estimates);

- **Data in connection with premium calculation and collection:** this includes in particular insurance premium, dunning and debt collection data and premium invoicing;
- **Health data:** This is data that relates to the physical, mental or emotional / spiritual health of a natural person and from which information about the state of health is obtained. This includes, for example, diagnoses, medical reports, notifications of illnesses, medical certificates and other physical or mental impairments ;
- **Data in connection with legal disputes:** This includes, in particular, data relating to complaints and disagreements about services or the contracts concluded for them, court documents;
- **Personal data requiring special protection:** This includes, for example, data about religious, ideological, political or trade union views or activities, data about health, privacy or racial or ethnic origin, genetic data, biometric data that uniquely identifies a natural person, and data about administrative or criminal prosecutions or sanctions;
- **Online communication data:** Data related to online communication between you and Generali;
- **Data related to the marketing of products and services:** This includes information such as newsletter subscriptions/unsubscriptions, brochures, consulting and contact details, documents received and special activities, personal preferences and interests, etc.;
- **Technical Data:** This includes, for example, IP address, cookies, metadata, logs recording the use of our systems, IP packets, and other technical identification data, data related to online/telephone communications;
- **Other data:** To the extent permitted, we also obtain certain data from publicly accessible sources (e.g. debt collection registers, land registers, commercial registers, press, Internet) or receive such data from other companies within the Generali Group, from authorities or other third parties.

Scope and purpose of data processing

We use the personal data we collect primarily to conclude and administer insurance contracts with our customers and business partners (including the administration of contracts concluded through one of our partners, e.g. health insurance, pet insurance, so in particular in the context of private pension provision, occupational pension provision, mortgage and investment business and in the non-life area for our customers. In addition, data processing may be necessary in order to comply with our legal / regulatory obligations in Switzerland and abroad.

In addition, we process personal data insofar as we can invoke a justification:

- **Advice, offer and insurance contract:** We process your data in the context of your request for advice, pre-contractual measures, the preparation of offers and finally for the processing, premium calculation and collection, the risk assessment, the assertion of rights of recourse, for the administration and possible termination of the insurance contract (including answering your questions and concerns).

  If you submit an application for insurance coverage, we require the information you provide for the conclusion of the contract and to assess the risk to be assumed by us. If the insurance contract is concluded, we process this data for the execution of the contractual relationship, for example for policy issuance and invoicing. Without your data, the contract cannot be concluded.

  For example, we use your contact details, including the details of any co-insured persons, in order to carry out pre-contractual clarifications and to be able to contact you. We use your application data (including health data, if applicable) to be able to assess the risk to be assumed by us and for premium calculation. We need your customer data for our contract management and your payment data, among other things, for the timely collection of premiums or payment of claims and benefits.

  We process creditworthiness data from external providers for the purpose of calculating premiums and checking creditworthiness. The processing of this data is permitted on the basis of the insurance contract.

  We also inform you that our premiums may be based on automated calculations that analyze various criteria relating to the insured persons or property. This enables us to determine the insurance risk in more precise terms. We place a strong emphasis on fair insurance terms, however, in that the analysis always refers to customer segments and not to the individual person.

  In some circumstances, we need your health data to be able to assess whether a contract can be concluded and under what conditions. When obtaining this data, we ask for your permission. Only then do we obtain additional information and documents. We process this health data for the assessment and administration of your insurance contract, whereby we also rely on information and documents from examining or treating physicians, hospitals, other health care or preventive health care facilities as well as social insurance carriers. In this case, we process this data exclusively on the basis of the consent you have given us for the purpose of fulfilling the contract.

If necessary for the processing of the contract, we disclose the data - limited to what is strictly necessary - to cooperation partners, co-insurers, reinsurers, other insurers involved or former insurance companies, insurance intermediaries/brokers, service providers (partners as well as physicians), pledgees, collection agencies, authorities and/or external experts who form the so-called insurance chain. In addition, we inform third parties to whom insurance coverage had been confirmed (e.g. relevant authorities) about the suspension, amendment or termination of the insurance relationship.

Processing is permitted on the basis of the insurance contract, even in the event that it is not concluded. If we collect personal data that requires special protection, such as health data, we can base the processing of such data on your express consent.

The data must be kept for at least 10 years from the ordinary termination of the respective contract or after the conclusion of a claim, whereby individual components may have shorter or longer periods. Offer data is generally retained for 2 years, even if no insurance contract is concluded. After expiry of the corresponding retention periods, your data will be deleted.

- **Claims and Benefits:** We process your data for the assessment, review and settlement of claims, legal cases and benefits. Without your data, it is not possible for us to review your claim, legal case or benefit.

  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 (repair shops, craftsmen, doctors, hospitals). For this purpose, we can also access data about you from public sources (Internet sites, social media, etc.).

  For example, we use your contact data, including the data of any co-insured persons, to contact you. We process your customer data for claims, legal case and benefits administration, any claims or legal case data (including health data if applicable) - such as claims or legal case notifications, clarification reports and invoice receipts - we require for processing the claim, benefit or legal case, your payment data and the necessary bank coordinates to pay out claims or benefits.

  For the purpose of claims processing and accident analysis in the case of traffic accidents, data recorded directly by the insured vehicle can be read out in the event of a loss occurrence for the purpose of determining the cause of the loss or the consequences of the loss. As a rule, the data is read out by the accident investigation authority (on behalf of the public prosecutor's office). Depending on the manufacturer, this includes information such as speed, acceleration, delay, date and time.

  In connection with a claim or insured event, we may obtain relevant information from other insurance companies, authorities (police and investigation authorities, road traffic offices or other official agencies) as well as from vehicle manufacturers and other third parties and inspect the relevant files. If necessary, you must authorize the aforementioned offices to release the relevant data or release the doctor from the medical confidentiality obligation, see also Art. 39 of the Swiss Federal Law on Insurance Contracts (ICA) and Art. 62 of the Swiss Federal Data Protection Act (FADP).

  Under certain circumstances, your consent may be required for the retrieval of particularly sensitive data, such as health data. In this case, we process this data exclusively on the basis of the consent granted by you for the purpose of processing the claim, legal case or benefit.

  If necessary for the processing of claims, legal cases or benefits, we disclose the data - limited to what is strictly necessary - to cooperation partners, co-insurance companies, reinsurance companies, other participating or former insurance companies, insurance intermediaries/brokers, service providers, lien holders, collection agencies, authorities, lawyers, external experts, doctors, authorized agents and/or claims settlement bodies that constitute the so-called insurance chain. In addition, for the enforcement of recourse and contractual recourse claims, information can be disclosed to liable third parties and their liability insurance - also abroad.

  The processing is permissible due to the underlying insurance contract and due to the fulfillment of a legal obligation. If the processing of your personal data is based on consent, we process the data within the scope of this consent.

  The data must be retained for at least 10 years after the claim is settled. After expiry of the relevant retention periods, your data will be deleted.
- **Holistic advice:** We continue to use the data for an overall assessment of your customer relationship with Generali, for example, for advice regarding a contract adjustment, for holistic pension and financial advice (needs-based advice and support), incl. acquisition and application support, as well as for comprehensive information provision.

  In this context, Generali also processes your personal data for quality controls, customer surveys,

for advertising purposes, statistical evaluations, for market and opinion research (including evaluation of data by profiling and automated decisions), such as customer satisfaction surveys, implementation of events, general customer communication and personalized adaptation of Generali's offers, as well as for the creation of customer profiles. This may also include processing the data for the evaluation, offer, improvement and new and further development of our products, services and websites, apps and other platforms.

Marketing purposes include all Generali activities that can be used to acquire customers or expand existing customer relationships. For example, we use your behavioral, preference and contract data for analyses in order to further develop existing products, offer them to you and develop new products and services.

In order to be able to address existing and potential customers through marketing measures that could be of particular interest, we process not only personal information and contact data, but also other data that helps us to determine or personalize the target group and the content of marketing communications. This also includes data from interactions with us, e.g. regarding usage behavior on our website, as well as data from other public sources.

For individualized and targeted advertising, for the submission of offers and in order to better meet your needs, we may also create personality profiles about you and divide you into so-called advertising groups.

If you request an individual quote for insurance or a mortgage via www.generali.ch, we process your personal data (such as age, nationality, accident history) and allow us to advertise other products to you.

For your personality profile, we generally do not use any personal data that requires special protection, such as your health data. Certain marketing measures may be carried out by (or in cooperation with) commissioned processors and cooperation partners, joint controllers or other third parties.

You can withdraw your consent to marketing campaigns and personalized advertising at any time by contacting the data protection advisor.

We consider data processing to be permissible on the basis of our overriding legitimate interest or on the basis of consent granted.

- **Statistics and traceability:** We also process your personal data to generate insurance-specific statistics, usage statistics and analytical evaluations, for example, for the development of new tariffs, to meet regulatory requirements or for risk management purposes.

  In this context, your data may be processed for the development of our conditions and premium tariffs or generally for the further development of our insurance business, in particular also in the area of artificial intelligence.

  In order to further develop our existing products and services (incl. our website) and thus to be able to make you as a customer an optimal offer, we also use the possibility of market and opinion research, so that we can recognize your needs and wishes even better. For this purpose, we use your contact, contract and customer data and analyze, for example, how you navigate through our website or which products are used by which groups of people and in what way.

  In addition, we use information from customer surveys, polls and studies as well as other information, e.g. from the media, social media, the Internet and other public sources. In this context, we may also obtain data from third parties or from cooperation partners.

  If possible, we use anonymized data for our surveys or anonymize or pseudonymize the data over the course of the statistical process. In certain cases of statistical or scientific surveys or research, we receive data from third parties and merge them with our data. In addition, data may be disclosed to contract processors, cooperation partners, joint controllers or other third parties for the purpose described. The data disclosed are processed by the relevant company for the intended purpose.

  We consider the data processing to be permissible due to our overriding legitimate interest, whereby this consists of improving our products, services and internal processes.
- **Insurance fraud:** We process your data in order to detect, prevent or avoid potential insurance fraud. Furthermore, we process your data for the purpose of combating insurance fraud, combating money laundering and terrorism financing, and within the framework of the regulations on international sanctions, as well as for the prevention and investigation of criminal offenses and other misconduct, as well as for conduct internal investigations, to protect against insurance fraud, data analysis to combat fraud.

  For example, we use your contract, claims and benefits data and analyze them in order to identify any suspicious patterns. For this purpose and to protect you and us from unlawful or improper activities, we may also create and process profiles.

  In connection with the detection of misuse - control of suspected cases – we exchange data with external cooperation partners as well as other insurance companies and service providers for investigations. If

consent has been given, we respond to inquiries from other insurance companies about their customers if there is a suspicion of insurance fraud. For example, we provide information about existing policies or previous claims. If there is a legal basis, we may disclose data to the competent authorities.

Their data is also regularly cross-checked against the sanctions lists of the United Nations, the European Union, the Swiss State Secretariat for Economic Affairs (SECO), HM Treasury and the U.S. Office of Foreign Assets Control (OFAC).

For insured persons domiciled or resident in Switzerland, we can also carry out queries with the HIS information system and, in the case of motor vehicle damage, with Car Claims Info.

- **Verification of lawfulness and legitimate interests:** 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):
  - **a)** to ensure IT security and operations and to protect our employees and assets,
  - **b)** to ensure data accuracy, where we may purchase data or match address data to validate existing customer master data, with possible contact in the event of discrepancies,
  - **c)** for sales support and for quality and satisfaction surveys,
  - **d)** to develop offers and advertise products of Generali Switzerland and our cooperation partners,
  - **e)** for corporate governance and in the context of restructurings and transactions,
  - **f)** Assertion or defense of legal claims in connection with legal disputes and official proceedings;
  - **g)** to invite potential prospects to an organized event or product presentation for the purpose of customer retention and customer experience;
  - **h)** for the enforcement of and defense against legal claims, for the prevention and investigation of criminal acts, in particular data analyses to detect indications that may point to insurance fraud;
  - **i)** for the settlement of claims in case of death, necessary and relevant information or a report is obtained from the police;
  - **j)** for clarification and for the purpose of cooperation with the claims organization Earthquake Switzerland. In doing so, we pursue the purpose of increasing safety in the event of earthquakes, ensuring the provision of an emergency organization in the event of an emergency and enabling simplified reconstruction.

  Furthermore, we process your data to comply with regulatory and legal obligations and to ensure that laws, guidelines, requirements and internal directives are observed. For example, we process your data for legally required reports to authorities that serve to prevent, detect or clarify criminal offenses or other violations. This includes, among other things, the duty to provide information, the duty to inform or the duty to report in connection with duties under supervisory and tax law.

  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 to the extent necessary.

  For individual reviews where special technical know-how or extended expertise is required, we may call in cooperation partners or other third parties to assess and/or process the case.

  The data will be kept for at least 10 years since the expiry of a product / a contract or since the last processing. After expiration of the corresponding retention periods, your data will be deleted.
- **Other purposes:** We also process your data for other purposes, e.g. as part of our internal processes, for administrative purposes, for training and for quality assurance, to protect customers, employees and other persons, and to protect Generali's data, secrets and assets or those entrusted to Generali.

  In the process, your data can also be processed for:
  - **a)** Inquiries via contact forms, chats, emails, phone;
  - **b)** Subscriptions to newsletters, portals or the like;
  - **c)** Optimization of the website (adaptation of the website to your needs);
  - **d)** Defense against and recording of hacking attacks;
  - **e)** Guarantees of business operations, in particular information technology, our websites, apps, systems and other platforms;
  - **f)** Video surveillance to maintain house rules and other measures for IT, building and facility security, to protect our employees, other persons and assets entrusted to us (e.g. access controls, visitor lists, network and mail scanners). We also use video surveillance to protect our customers, our data and employees, the (business) secrets and assets entrusted to us, and the security of our systems and our buildings;
  - **g)** Communication with third parties and processing of their requests, provided that there is a justification.
  - **h)** records and management information and other reports on customers, transactions and activities, proposals and other business aspects of Generali

for the purposes of managing and developing the Company, its offerings and activities, and project management.

We consider data processing to be permissible on the basis of our overriding legitimate interest, whereby the interest is in the sensible management and development of the company.

- **Application:** When you apply for a vacant position with us, we process your data for the purpose of carrying out the application process.

  Further information about the processing of your data when applying can be found here: https://recruitingapp-2717.umantis.com/Vacancies/5585/DataProtection/1

Data procurement

Personal data is primarily collected directly from you (e.g. personal consultation, and through online, application and claims forms). If you wish to take out an insurance policy on behalf of another person (family members, etc.) or provide us with personal data from another person, please ensure that they are aware of our privacy policy. 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 offices and process it in compliance with legal requirements. For example, we process data that we receive from public authorities in order to be able to carry out the analyses when concluding a contract or to ensure the processing of the contract. In addition, we process data from data suppliers or from other website operators and online networks in order to offer you the best possible service, to provide you with optimal advice and to ensure the accuracy of the data. To the extent permitted, we also obtain certain data from publicly accessible sources (e.g. debt collection register, land register, commercial register, media, internet) or receive such data from other companies within the Generali Group, from authorities, cooperation partners or other third parties.

We may also disclose data to third parties for a specific purpose or obtain data from third parties for a possible credit check or credit assessment. For these purposes, your personal data may be forwarded to third parties, such as Intrum AG or Crif AG, for a specific purpose (which does not constitute a justification for processing for other purposes).

Data sharing and transfer

a) Fundamental:

We protect your data, always process them confidentially and do not sell them to third parties.

Due to the complexity of today's data processing procedures, we sometimes use service providers and commission them to process your data or give them access to your data for a specific purpose (e.g. if required for the conclusion or performance of a contract or for other purposes stated in this data protection declaration). In particular, your personal data may be passed on to commissioned third parties. These third parties will act and process your data on our behalf and in accordance with our instructions (unless they in turn process the data as a controller). Commissioned third parties process the data only for the purpose for which the data was originally collected or where another justification exists. Generali may also outsource business areas, individual value-added steps and/or services (e.g. benefit processing, IT, 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.

Some of these service providers may be located outside of Switzerland and also outside of Europe, worldwide, in particular wherever branches of our group of companies are located. However, when using service providers, we always ensure that the relevant data protection regulations and data security standards are maintained and that confidentiality and, where applicable, secrecy are always observed when processing the data.

The control and responsibility regarding the use of data and information according to this privacy policy remains with us as the responsible person (controller). It may happen that certain data is stored or processed on computers or computer systems located in other jurisdictions that do not have the same level of data protection as Switzerland. In such cases, we will ensure that appropriate safeguards are in place that require the relevant data processors to take data protection measures comparable to those in Switzerland.

We are part of the Generali Group and therefore carry out certain business processes partly in central service units and data processing systems of the Generali Group. If we transfer data to a country without adequate legal data protection, we ensure an adequate level of protection by using appropriate contractual provisions (e.g., based on standard contractual clauses of the European Commission) or on the basis of so-called Binding Corporate Rules, or we rely on the legal exceptions such as consent, contract execution, establishment, exercise or enforcement

of legal claims, and overwhelming public interest in published personal data.

Furthermore, within the scope of our business case processing, it may be necessary for us to transfer or jointly process your data within our insurance company or within the Generali Group. Your data may also be disclosed to other responsible parties or cooperation partners.

As described, we work with third parties who process your data on their own or under joint responsibility with us. We consider these third parties to be any natural or legal person, authority, institution or other body that does not belong to the Generali Group or to the order processors. In particular, we include our cooperation partners and the following categories:

- Insurance intermediaries, distributors and other contracting partners
- Pension institutions
- Collection
- Telephone services
- Postal and general services
- Experts such as doctors and lawyers
- Pre-, co- and reinsurers
- Social and health insurance companies and other private insurance companies
- Other parties involved in an incident (e.g. in damage cases)
- Authorities and public offices in Switzerland and abroad
- Other parties in potential or actual legal proceedings
- Garages/breakdown service providers/transporters/taxi and rental car companies

b) 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).

c) Involvement of intermediaries:
In your insurance matters and within the scope of the other services offered by Generali Switzerland or our cooperation partners, you will be looked after by intermediaries who, with your consent, will also advise you on other financial services. For the purpose of providing support and advice, the intermediary collects and processes the personal application, contract and claims data required to conclude and execute the contract. Generali Switzerland also transmits the aforementioned data about you and your insurance relationship to your intermediary, insofar as the intermediary requires this information for your support and advice.

d) Disclosure of data to supervisory authorities and courts as well as to other third parties:
As an insurance company, we are subject to stringent regulatory requirements and ever-increasing official supervision. In this context, we may be required to disclose personal data of our policyholders, insured persons or mortgage debtors to authorities, courts, auditors, etc. as part of their statutory duties at their request. Likewise, when examining your claim, we may have to involve third parties such as doctors, hospitals, appraisers, lawyers or companies commissioned to settle claims (e.g. for the provision of credit reports) and transfer your personal data to them. In all these cases, however, we always ensure that the legal basis is observed.

e) Data processing within our Group:
In order to provide comprehensive insurance cover, certain services of Generali Switzerland are partly provided by legally independent companies in Switzerland and abroad (e.g. by specialized Group companies of the Generali Group). In the context of the purpose of the contractual relationship, Generali Switzerland relies on the transfer of data both within and outside the Group.

f) Foreign transfers to certain third countries:
If data is transferred to a country without adequate data protection, we ensure the necessary protection status by means of the use of sufficient contractual safeguards (e.g., based on the EU standard contractual clauses, Binding Corporate Rules or we rely on the exception of consent, contract performance, 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).

g) Hint and Information System (HIS):
For the prevention and detection of insurance fraud in the non-life sector, Generali Switzerland is connected to the information system (HIS) of SVV Solution AG. Participating companies enter persons in the HIS who have reported a claim for a reason specifically defined in the HIS operating regulations (e.g. insurance fraud). Each person is informed in writing of his or her notification. As part of the claims process, Generali Switzerland can make a query in the HIS and, on the basis of the data transmitted, identify whether information has been stored on the basis of a previous notification and verify the obligation to pay benefits. The

operation of HIS is governed by operating regulations and complies with legal requirements regarding data protection. Further information on HIS can be found at www.svv.ch/en/his.

Automated data processing

a) **Principle:**
In order to offer you the most efficient business case processing possible, we use, among other things, automated check programs which determine the insurance risk on the basis of the information you provide in the insurance application, decide on the conclusion of the contract and, for example, determine the amount of your insurance premiums or any 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.

b) **Profiling:**
By means of profiling, Generali can create customer segments so that we can provide you with individualized advertising or offers that are better tailored to your customer needs. Generali also obtains additional statistical information through the use of data analysis procedures. We process your personal data, in some cases automatically, with the aim of evaluating certain personal aspects (profiling) or making a preliminary selection when you enquire about a product. We use profiling in particular to provide you with targeted information about products and to advise you according to your needs. In doing so, we use evaluation tools that enable us to carry out appropriate communication and advertising, including market and opinion research. Furthermore, we can process your data from transactions or website visits and enrich it with existing data so that we can make you better offers.

We also use profiling to identify misuse and security risks, to perform statistical evaluations, and for operational planning purposes. We will perform profiling to identify a possible relevant customer group (for example, to prepare/select a sales campaign). In addition, these processing operations may be used to combat money laundering and abuse, as well as to check creditworthiness. Finally, profiling can be used for individualized risk measurement and assessment as a necessary calculation basis for the insurance contract. For the calculation of a possible purchase probability, your data can be compared with other data by means of a statistical regression analysis.

Profiling is the automated processing of data in order to analyze or predict certain personal aspects or the behavior of a person and thus to evaluate them. This is done by combining, linking and analyzing personal data available to us. The result, i.e. the profile created, provides us with information about personal aspects such as personal preferences, interests, whereabouts or changes of location. As a result, you can receive more individualized support and advice, or offers can be better tailored to individual customer needs.

In the case of data processing for profiling, we will inform you in accordance with the legal requirements. Upon your explicit request, we will ensure that the automated decision is reviewed by a natural person.

c) **Automatic case-by-case decision-making:**
To ensure the efficiency and uniformity of our decision-making processes, we can also make certain decisions on a fully automated basis (computerized basis according to specific rules and without human influence or review by employees). These decisions can also be made on the basis of profiling. When you purchase a product, we may make decisions based on your data, some of which may be automated (e.g., by means of profiling).

In the case of such an automated individual decision, you will be informed separately about its implementation if the decision leads to negative legal consequences for you or to a comparable significant impairment. In such a case, you have the opportunity to have these decisions reviewed by an employee.

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 parties to the contract. For example, we process personal data (name, date of birth, country of birth, nationality, etc.) of insured persons, injured parties or beneficiaries. This is necessary in order to be able to provide the agreed insurance benefit to the beneficiary after the occurrence of the insured event. If insurance cover exists for a person other than the policyholder, we also process their data. We need 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 from third parties, e.g. the injured party, the person causing the damage, 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 the collected data for as long as is necessary in compliance with the statutory retention periods (accounting, limitation period, company law, tax and social security law) and to fulfill our stated processing purposes as well as on the basis of our overriding legitimate interests (in particular to prove or defend against claims and to prove good data governance), 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 evidentiary and documentation purposes). As soon as your personal data is no longer required for the above-mentioned purposes, it will generally be deleted.

In addition, we comply with documentation obligations or process your data on the basis of obligations to provide evidence and proof. In this context, it is possible that personal data will also be retained during the period in which claims are asserted against Generali or insofar as we are otherwise obliged to do so by law or by the authorities or legitimate business interests require this. As soon as your personal data is no longer required for the above-mentioned purposes, it will be deleted or anonymized as a matter of principle and to the extent technically possible. For operational data (e.g. system logs, logs), generally shorter retention periods apply than for personal data.

Communication with Generali / customer portals

We communicate with you as our customer in a variety of ways, mostly based on the contractual basis or your request for advice, as well as our legitimate interest in communicating with you and in further developing our offerings and customer relationship. We also understand your use of the respective interaction channel as your consent to data processing for the respective (stated) purpose. If the communication takes place with a view to concluding an insurance contract, the additional legal basis for processing is the initiation or performance of a contract.

a) **Electronic communication and e-mail:**
The security of your data is important to us and we therefore take appropriate technical and organizational security measures to protect this within our systems. If you send us personal data via an open network or over the Internet, this is not always protected by appropriate encryption mechanisms. Despite extensive technical and organizational security measures, it is possible that data may be lost or intercepted and/or manipulated by unauthorized persons.

Generali is therefore in no way liable for any damage that you may suffer as a result of data loss or manipulation. The Internet is a worldwide open network. If you transmit personal data via the Internet, you always do so at your own risk and are liable for any misuse of data or loss of data.

It is not possible to guarantee data security for e-mails sent to us unencrypted, which is why Generali excludes any warranty and liability. As an alternative to encrypted e-mail communication, we therefore recommend that you contact us via the customer portal, letter or homepage.

By voluntarily providing your e-mail address, you are using the services of Generali Switzerland and agree to documents relating to your contract(s) being sent to you by e-mail. In our customer portal, we offer you the option of gradually switching from letter mail to electronic contract mail.

Secure shipping is always important to us. Before we send you documents, we therefore check what protection your documents require. If you do not yet have a suitable electronic delivery method, you will continue to receive your documents by mail for the time being.

If you wish to send us an e-mail with confidential content, it should be encrypted in order to prevent unauthorized access or falsification in the course of transmission. As a matter of principle, we do not send documents with data requiring special protection (e.g. health data) by e-mail. We will be happy to send you these documents by mail or upload them to your electronic customer portal.

b) **Duties of care of the user in e-mail communication:**
You are responsible for providing us with a valid email address to which only you have access. You must therefore keep all access data appropriately secured.

We will not send you the documents sent to you digitally again by post; unless legal regulations or contractual agreements stipulate otherwise. You are obliged to regularly check whether you have received electronic documents from us. If your e-mail address changes, please inform us immediately.

At times, the dispatch of electronic communication may be restricted or excluded. Reasons for this include, for example, disruptions to technical equipment, network and communication connections, as well as maintenance work or force majeure. If there is reasonable suspicion of misuse of the digital contract mail, we will block digital dispatch. We will notify you of this as soon as possible by letter post.

c) Phishing:

Phishing scammers forge e-mails and websites in order to obtain your confidential data, such as passwords or other sensitive data. Please note that we will never send e-mails or text messages asking you to provide strictly confidential personal data such as your bank account details, credit card number or password, sometimes with bizarre reasons (e.g. end of insurance cover, cancellation of mortgage).

d) Communication via SMS or digital channels:

In the course of processing your requests, we also communicate with you via SMS in addition to other channels in order to keep you informed about the status of contract administration, claims processing or your request.

An up-to-date and professionally maintained social media presence is an important element of our communication policy. We use our social media presence to establish direct communication and interaction with you. In addition, we want you to be able to find out about our products and services in an uncomplicated and up-to-date manner. You therefore have the option of contacting us via private message using WhatsApp, Apple iMessage or Facebook Messenger. When contacting us via one of these social media channels, you agree that we may reply to you via the same provider. Please note that we cannot provide you with certain information via the same communication provider channel and use other communication channels for this purpose.

The possibility of contacting you via social media and providing a corresponding website for this purpose represents a legitimate interest (legal basis) for us. Further processing procedures, such as the detailed analysis of behavior on the social media portals, also in connection with your personal registration there, are the responsibility of the providers of the social media portals themselves. Please obtain information about the types of data processed, the legal basis for these processing operations and their purposes from the providers themselves.

Together with the providers of the social media portals, we are responsible for the data processing on our social media presences. You can claim your rights to information, correction, deletion, restriction of processing and data transfer from us or from the provider of the social media portal. You also have the right to lodge a complaint with a supervisory authority. Please note that we only have a limited influence on the data processing procedures and the period of data storage within our social media presences.

We process the personal data you enter on our social media sites. This includes your username and the data you publish (e.g. posts, forwards). Our processing is limited to responding to your posts or making posts where we refer to your username or images (for example, when you contribute images under contests). In this way, we integrate the data you publish more closely into our social media sites and make your personal data accessible to other users in this extended form.

When you contact us via external communication providers, data from the respective conversation may be collected and further used by these providers. We have no influence on the data processing by these providers. The same applies to a possible lack of data security, so that we reject any liability.

Please also note the general terms of use of the respective providers:

- Whatsapp: https://www.whatsapp.com/legal/?lang=de
- Apple iMessage: https://www.apple.com/legal/privacy/de-ww/
- Facebook Messenger: https://www.messenger.com/privacy?locale=de_DE
- Instagram: https://help.instagram.com/581066165581870

e) MYGenerali customer portal:

If you have applied for access to the Generali customer portal, we will make available to you in your personal Generali customer portal data about yourself, your contracts and any claims settlements and related correspondence, as well as health data for the purpose of contract management, depending on the insurance you have taken out. The data will be stored in your personal Generali customer portal for as long as the customer portal (i.e. your account) exists. If you or we terminate your Generali customer portal, the data stored in it will also be deleted. If you install the Generali apps on your end device (e.g. smartphone, tablet), certain data relating to your contracts

will be stored on your end device, depending on the Generali app.

When using the customer portal, you as a customer create an account and we process your data such as name, address, e-mail and telephone number. Login data, accesses, transactions, mutations and movements that you make in the customer portal are stored.

The data and documents displayed to you as a customer are obtained from the relevant areas and systems of Generali and remain visible as long as you are logged in as a customer. Within the scope of using the customer portal, all personal data that is necessary for handling the respective processes and services can thus be processed. However, the data can also be transmitted to you by e-mail (in accordance with your wishes) or by post. Insofar as data is transmitted by e-mail, the transmission is unencrypted and at your risk.

With account creation and delivery or uploading of your data, you give us the appropriate consent to use this data. We use the data to ensure the applications and their improvement and for general contractual purposes, as well as for marketing and the maintenance of existing and future customer relationships.

For more information: generali.ch/portal/nutzungsbedingungen

The legal basis is the contractual initiation or administration or the execution of a contract, your consent (e.g., in the case of explicitly granted powers of attorney), and our legitimate interest in analyzing and optimizing the services and marketing.

f) Online forms:

We offer various products and services online. Premium calculators, quotation/offer forms and service forms (e.g. notification of claims, application for contract adjustment, order of proof of insurance, request for advice, notification of change of address, feedback, contact form) are used for this purpose. For information on how we process your personal data in general can be found in the first part of the data protection declaration.

The data you entered online will be used in particular to process contracts and claims, to handle your inquiries and, if applicable, for Generali's marketing purposes. If you are not yet a customer of Generali, we record your data in our address management system. After we have prepared an offer, we will normally contact you. Confidential, personal data that you send to us via the forms on the website are transmitted in encrypted form in accordance with the latest technical standards of technology and cannot be viewed by third parties.

When using our online forms, your accesses and use may be recorded, stored and evaluated. This serves primarily to improve our online offer and for marketing purposes. Your information may be combined with data about your use of our websites (e.g. login data, accesses, transactions, mutations and movements), your insurance contract data and data about the use of third-party websites.

We also use cookies for our online forms and use Google Analytics.

We collect data via offer and service forms that we require for the execution of an online service. In particular, this includes personal information and contact data (e.g. first and last name, gender, date of birth, age, marital status, language, nationality, e-mail address, telephone number, profession). Depending on the type of online service, other data such as application data (e.g. information provided by the applicant on the insured risk, answers to questions) may also be collected. If required for the execution of an online service, payment data (e.g. mortgage information, creditworthiness information for the decision on whether to conclude a contract) or any claims/benefits/claims data (e.g. data relating to injured third parties) may also be collected. Furthermore, it may also be the case that personal data requiring particular protection (e.g. reply to questions regarding the withdrawal of identification for motor vehicle insurance application) is collected.

Insofar as indicated as "mandatory", the information requested within the framework of the premium calculator and offer or service forms is necessary in order to continue the respective request and, in particular, to obtain information on rates and the premium amount, to use a service and, if applicable, to conclude an insurance contract or to be able to submit an application for the conclusion of an insurance contract. Full use of the premium calculator, offer and service forms is not possible if you do not provide us with the correct personal data.

If required for the execution of an online service, the information you provide may be disclosed to the recipients responsible for the execution of the respective service (e.g., risk assessment when concluding a contract). If necessary, you will be notified of this separately or we will obtain your consent. These recipients may be in Switzerland, within or outside the EEA area.

The legal basis is usually the contractual initiation or administration or execution of a contract. Furthermore, the possible processing of special categories of personal data is based on your consent.

g) Newsletters / brochures from Generali:

On our website you can subscribe to our newsletter

by providing us with your contact information (first and last name, email address). For verification purposes, we will send you a confirmation email immediately after completing the registration process. The data collected as part of your registration will be used to send our newsletter and may be merged and used with other data from you that we process. This personal data may be passed on to our marketing department, which processes the data only on our behalf.

Newsletters are sent on the basis of your consent using the data you provided when registering for the newsletter, or because you are a customer of ours. You can revoke your consent to receive newsletters or object to receiving further mailings at any time, e.g. by using the unsubscribe link directly in the newsletter.

In addition, all customers receive a brochure highlighting specific Generali insurance services (e.g., life or non-life).

h) **Customer surveys, market research and satisfaction analysis:**
Feedback from our customers is very important to us. This is the only way we can improve ourselves and our products, and further develop our services and web presence. Please do not hesitate to give us your honest feedback. We have a general feedback form. In addition, we use order-related providers for our customer surveys. We use cookies and web analytics services on the survey platforms. We use your survey and evaluation data to improve services.

The legal basis is your consent as well as our legitimate interest to know how satisfied you are and to receive suggestions for service improvement.

In some cases, we work together with market research institutes or conduct interviews/tests ourselves. Surveys conducted on our behalf with external partners are subject to confidentiality and the assurance that your data will not be passed on to third parties. We do not evaluate the data collected by external partners on a personal basis and delete it after 2 years at the latest.

i) **Trigger Campaign Management:**
A successful customer relationship is important to us. Therefore, we process your data for such campaigns or customer selections where we would like to record your needs precisely so that we can submit an offer to you.

Data subject rights

a) **Initial situation - identity verification:**
In order to avoid abuse, the exercise of your rights requires that you clearly prove your identity (e.g. by a copy of your identity card or passport), unless we can clearly identify you otherwise.

b) **Basic information about your rights:**
If your data is processed by us, you may, within the framework of the applicable data protection law and the purpose of processing, unless otherwise stated, at any time and in principle free of charge, assert the following rights as follows.

c) **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).

d) **Right of rectification:**
You have the right to have us correct data if it is incorrect. If we have stored incorrect personal data about you, we will be happy to correct it based on your notification.

e) **Right of 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 Generali or a legal basis (e.g. retention obligations). If deletion proves to be technically impossible or involves a disproportionate effort, we may reject your request for deletion.

f) **Right to restrict processing:**
In certain cases, you have the right to restrict processing, e.g. if the accuracy of the data is disputed or unlawful processing is asserted.

g) **Right to object:**
You have the right to object to the processing of your data with immediate effect for the future, in particular if the processing is carried out to protect our legitimate interest, such as in the case of direct marketing.

h) **Right to withdraw consent (opt-out):**
You have the right - insofar as the processing of your data is based on your consent - to revoke your consent with immediate effect for future processing. However, this is only possible if the data processing is not required in connection with contractual obligations.

Important: If you have given us consent for the processing of data, you can withdraw this consent at any time with effect for the future.

i) **Right to information in the case of an automated individual decision:**
If we have made an automated individual decision within the meaning of the applicable law, we will inform you of this. You then have the right to state your position, to challenge the decision and to request that the decision be reviewed by a natural person. We will inform you of the contact point in the context of the decision made.

j) **Data portability:**
You have the right to request that we provide certain personal data in a commonly used electronic format or transfer it to another controller.

k) **Exercise your rights:**
In the event of a violation of your rights, you have the option of filing a complaint with the responsible data protection advisor.

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.

If you believe that Generali is not complying with applicable data protection regulations with respect to you, please first contact the responsible data protection advisor named above.

However, you can also file a complaint directly with the competent data protection supervisory authority:

Switzerland
Federal Data Protection and Information Commissioner
Feldeggweg 1
CH-3003 Bern

Principality of Liechtenstein
Data Protection Office (DSS)
Städtle 38
P.O. Box 684
FL-9490 Vaduz

Legal basis for the processing of your data:
Generali processes your personal data on the basis of the following legal grounds / with the following justifications:

Contract performance:
- Fulfillment of a legal obligation;
- Consent of the customer.

Legitimate (Overriding) Interests:
- Comprehensive customer service;
- Efficient and effective protection of customers, employees and others;
- Protection of data, secrets and assets;
- Security of systems and buildings;
- Compliance with legal and regulatory requirements and internal rules;
- Efficient and effective customer service, liaison and other communications with customers outside of contract execution;
- Maintaining and secure, efficient and effective organization of business operations and successful further development of the website and other IT systems;
- Sale and supply of products and services, including with respect to persons who are not direct contracting parties (such as beneficiaries);
- Meaningful business management and development;
- Tracking customer behavior, activities, preferences and needs, market studies;
- Efficient and effective improvement of existing products and services and development of new products and services;
- Implementation of advertising and marketing;
- Interested in the prevention of fraud, misdemeanors, and felonies, as well as investigations related to such offenses and other inappropriate conduct, handling legal complaints, and proceeding;
- Participation in legal proceedings and cooperation with authorities;
- the assertion, exercise or defense of legal claims.

Consent:
- By entering into a contract, sending an e-mail or otherwise actively doing so, consent for the related data processing may be implied (explicitly or implicitly);
- By using the respective website, you consent to the processing of the data collected about you in the manner and for the purposes described.

You can object to the data collection and storage at any time with effect for the future.

Update

Generali may revise this General Privacy Statement periodically. Any changes to this Privacy Policy will be communicated immediately on this and related websites.

Generali reserves the right to adapt this data protection declaration at any time without prior notice, in particular to current legal provisions and changed business processes.

The last update of this privacy policy was on 21.05.2025.

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