

# **Privacy Statement for Third Parties**

Version: 01.03.2021

**wefox**

This Privacy Statement is addressed to those insured under an insurance policy with our client, beneficiaries specified by our client, injured witnesses, heirs, additional data subjects in the event of a claim and other contact partners to an insurance policy.

## 1. Who is the controller under data protection law and whom can you contact?

The controller for the processing of personal data (referred to below in short as “data”) is:

wefox Insurance AG  
Aeulestrasse 56  
9490 Vaduz  
Liechtenstein

## 2. How can you contact the data protection officer of wefox Insurance AG?

You can contact our data protection officer at the following address:

wefox Group Services (GER) GmbH  
Data Protection Officer  
Urbanstr. 71  
10967 Berlin  
Germany  
Email: [dataprotection@wefox.com](mailto:dataprotection@wefox.com)

## 3. For what purpose and on what legal basis do we process your personal data?

We process your data in compliance with the relevant data protection regulations, in particular the European General Data Protection Regulation (below “GDPR”), national data protection laws and all other relevant laws.

We require your data (full name and contact details) if you a beneficiary and/or affected as a part of a claim handled by us, to check our duty of intervention and the establish the amount of the claim. It is not possible to handle the claim without processing your data.

The legal basis for the processing of your data for purposes of loss adjustment is Art. 6(1)(c) GDPR. If specific categories of data (e.g. your health data for checking a personal injury claim) are required, we obtain your consent under Art. 9(2)(a) in conjunction with Art. 7 GDPR. If we produce statistics with these data categories or if we use them in exceptional cases for research purposes, we do so on the basis of Art. 9(2)(j) GDPR in conjunction with § 27 of the Federal Data Protection Act (BDSG). We also process your data to safeguard our legitimate interests or those of third parties (Art. 6(1)(f) GDPR).

In addition, we process your personal data in order to comply with legal obligations, such as regulatory requirements for example, retention obligations under commercial and tax law or our advisory duties. In this case the legal basis for processing are the relevant statutory regulations in conjunction with Art. 6(1)(c) GDPR.

If we wish to process your data for a purpose other than those stated above, we shall inform you of this beforehand in accordance with the statutory regulations.

## 4. With whom do we share your personal data?

Depending on the type of data processed within wefox Insurance AG, only specific organisational units have access to your data. These are the specialist departments involved in the performance of our services. A roles and authorisation concept restricts access within our company to those roles and to the scope required for the specific purpose of processing.

We also transfer your data to third parties to fulfil the purposes specified under section 3. The categories of these recipients are broken down as follows:

### 4.1. Data processing within the corporate group:

Your data is transferred to affiliated companies, in particular to the authorised specialist departments of wefox Group Service (GER) GmbH and to FinanceFox Services BCN S.L.

### 4.2. External service providers:

We sometimes use external service providers to fulfil our contractual and legal duties. These service providers may therefore also receive data for these purposes, providing they maintain confidentiality and comply with our instructions under data protection law.

### 4.3. External service providers established in a third country (outside the EU and Switzerland):

Some of our service providers are completely or partially established in so-called third countries, i.e. outside the EU and Switzerland. For some of these third countries there is no adequacy decision under Art. 45(3) GDPR in place. The same applies in relation to appropriate safeguards as defined in 46 GDPR. The transfer of your data to these service providers is carried out on the basis of Art. 49(1)(a) and (b) GDPR.

### 4.4. Other recipients:

We may also transfer your data to other official or non-official bodies, such as to authorities to comply with statutory (disclosure) duties (e.g. law enforcement authorities).

## 5. Origin of your data

If you did not supply your data yourself, this was transferred to us for processing by other parties to the claim specified in the reference concerned (email subject line, subject of the letter and/or reference number or suchlike). This data concerns information required to contact you (your name, address, and your telephone number or email where necessary).

## 6. Duration of data retention

We erase your personal data as soon as it is no longer required for the purposes stated above. However, it may also be the case that personal data is stored for the period during which claims may be made against our company (statutory limitation period of three or up to thirty years). We also store your personal data where we are obliged to do so. The relevant proof and retention obligations derive, inter alia, from the Commercial Code, the Fiscal Code and the Money Laundering Act. The storage periods under these amount to up to ten years.

## 7. What are your rights?

You have the right to information about your data at all times, and under certain conditions to the rectification and erasure of your personal data. You may also have a right to restrict the processing of your data and a right to the return of the data provided by you in a structured, commonly used and machine-readable format.

If we process your data to safeguard legitimate interests, you can object to such processing if there are reasons arising from your specific situation against the data processing.

If processing of your data is carried out on the basis of your consent, you have the right to withdraw your consent without affecting the lawfulness of the processing carried out based on your consent up to the time of its withdrawal.

## 8. Right to lodge a complaint

You have the option of lodging a complaint with the data protection officer specified above or with a supervisory authority for data protection.

The competent supervisory authority for data protection for us is:

Data Protection Office of the Principality of Liechtenstein  
Städtle 38  
PO Box 684  
9490 Vaduz  
Liechtenstein  
T +423 236 60 90  
Email: [info.dss@llv.li](mailto:info.dss@llv.li)