

# Privacy Notice

## wefox Switzerland AG

November, 2023  
Zürich, Switzerland

wefox

Data protection has a particularly high priority within wefox Switzerland AG. Wefox Switzerland AG (“wefox”, “we”, “us”, “our”) is part of the wefox Group and is an independent insurance intermediary that is committed to protecting your personal data. In this privacy policy, we provide you with comprehensive information about how we handle your personal data when you decide to visit the website wefox.com or www.wefox.ch, use the wefox application, or when identifying and assigning a suitable intermediary/advisor for you and your insurance product requirements.

Your personal data will only be collected, processed, and used in accordance with the statutory provisions and in good faith.

This Privacy Notice regulates the handling of personal data in accordance with the Federal Act on Data Protection (**FADP**), and if applicable the rules set forth by the EU Data Protection Regulation (**GDPR**).

This data protection declaration does not extend to any external links that lead to third-party offers. The data protection provisions of the respective provider apply to these offers.

## **CONTACT DETAILS:**

wefox is responsible for the processing of personal data for the purposes listed below. If you have any questions, we are available to answer your data protection concerns at the following address:

### **wefox Switzerland AG**

Landstrasse 53

4914 Roggwil BE

E-Mail: [dataprotection@wefox.com](mailto:dataprotection@wefox.com)

## **A. General information**

### **1. Scope of processing**

We collect your personal data for the following purposes;

- fulfilling our legal obligations;
- fulfilling our contractual and pre-contractual obligations towards you (incl. advisory services)(see also section C);
- conducting business with you;
- assessing your job application (see section E);
- newsletter and marketing (see section F).

In principles, in case you decide to enter into an agreement with us, we may process your contact details: your first and last name, e-mail address, address, telephone numbers, position, associated company/office, payment information.

We process your data to fulfill legal and contractual obligations such as regulatory requirements, commercial and tax retention obligations or our duty to provide advice.

The conclusion and execution of an insurance contract would not be possible without the processing of your data. If you apply for insurance cover, we need the information you provide to conclude the contract and to assess the risk to be assumed by us.

This may be necessary in particular: to ensure IT security and IT operations or to prevent and investigate criminal offenses, for example through so-called scoring. In particular, we use data analyses to detect indications that may indicate insurance fraud.

In addition, we advise you in choosing the desired insurance. For this purpose, we may also send your personal data to our sales and cooperation partners in Switzerland and if the situation requires it, abroad.

If the insurance contract is concluded, we will process this data to implement the contractual relationship, e.g., to issue policies or invoices. In the event of a claim or complaints, we might require further information from you, e.g., to check our liability to pay and the amount of the claim. It is not possible to process the claim without processing your data.

## 2. Personal data collected from third parties

The personal data we process originates primarily from you personally (e.g., claims notification, your claims for compensation, conclusion of the insurance contract). However, personal data may be also processed from publicly accessible sources (e.g., the Internet), from public authorities, financial institutions, credit agencies or private-, health- and social- insurers. For certain purposes (e.g., for claims settlement), personal data and other information may also be collected from other parties and their insurance companies. Furthermore, personal data may also be collected by Group companies in compliance with the applicable legal requirements also from companies of the wefox Group (insurance and non-insurance companies), cooperation partners and affiliated companies and compared with existing data.

We might also process personal data you provided to third party brokerage companies explicitly requesting to be contacted by us.

## 3. Transfer of personal data to third parties

We will only disclose your personal data to third parties if you expressly consent to this, if there is a legal obligation or permission to do so or if the disclosure is necessary to assert, exercise or defend legal claims, or if the disclosure of data is necessary for the management of contractual relationships with you.

Service providers that we engage with are mentioned below in this Privacy Policy. In order to provide our services, it may be necessary for us to disclose personal data to third parties:

### A. Within wefox Group

Your personal data might be transferred to affiliated companies, in particular to the authorized specialist departments of wefox Group Service (GER) GmbH, Urbanstrasse 71, 10976, Berlin, Germany and to FinanceFox Services BCN S.L.. Gran Via de les Corts Catalanes, 08014 Barcelona, Spain. For more information about the privacy policy of the wefox Group Services GmbH, visit the following link: <https://www.wefox.com/de-de/datenschutz>.

### B. External service providers

We sometimes use external service providers to fulfill our contractual and legal obligations towards you. We make sure that these service providers comply with confidentiality and applicable data protection laws.

**IT Service providers.** Service providers (e.g., for IT solutions) may, under certain personal data on behalf of wefox under certain process. They are contractually obliged to comply with the applicable data protection legislation as well as to secrecy and confidentiality. They may only use the data only for predetermined purposes, i.e., not for their own for their own purposes.

**Greenhouse.** Greenhouse is the recruitment system for our company. Information on data protection at Greenhouse can be found here: <https://www.greenhouse.com/de/privacy-policy>.

**OneTrust.** We use the OneTrust data protection management tool to efficiently process and document customer, applicants, subcontractors or other third parties requests and processes.. You can find more information about OneTrust data protection here: <https://www.onetrust.com/privacy/>.

**Insurers, insurance intermediaries, consultants, broker pools.** wefox outsources certain processes and tasks to service providers to ensure the handling of complex topics that require special knowledge or cannot be internally adopted or to be able to fulfil the contract with you.

**eKomi.** We use the evaluation portal eKomi Ltd., Berlin, Markgrafenstr. 11, 10969 Berlin. To improve our service continuously, we provide our customers with the opportunity to evaluate us through independent portals without any influence on this. An invitation to submit a review is generated for each insurance intermediary that takes place via our website. For this purpose, your surname, first name, email address and a reference number are transmitted to the evaluation platform. These data are neither used by the evaluation platform itself nor passed on to third parties. This is accompanied by consent to the data protection regulations and general terms and conditions of the evaluation platform. These are available on the website of the operator under the link: <https://www.ekomi.de/de/datenschutz/>.

#### 4. Cross-border data transfer

The transfer of personal data to countries outside of Switzerland may be based on the respective adequacy decisions of the Swiss Federal Council or on standard contractual clauses.

We have taken appropriate measures to ensure that the relevant personal data is available in Switzerland at all times.

#### 5. Storage periods

We will retain your personal data for as long as we deem necessary or appropriate to comply with applicable laws or as required for the purposes for which it was collected. We will delete your personal data as soon as it is no longer required, but in any case after the maximum statutory retention period of five respectively ten years. Personal data that is no longer required and for which there is no statutory retention obligation will be destroyed as soon as the purpose and justification for retention no longer apply.

Your personal data is stored on Amazon Cloud servers, Google servers. It is also stored at our main location in Zürich and the operational service center in Roggwil BE on our own servers and/or on servers of our providers in Europe.

#### 6. Security measures

We take reasonable measures to ensure that your personal data cannot be accessed or stolen by unauthorized third parties. We use SSL encryption for security reasons and to protect the transmission of confidential content, such as requests that you send to us as the site operator. Access is restricted to authorized employees only.

#### 7. Your rights

Upon request, we can provide you at any time with information about which personal data about you is being processed. Subsequently, in certain cases, you have a right to data portability and thus to the release of your personal data in a structured, common, and machine-readable format. Under certain conditions, you may object to the data processing and request its restriction as well as the correction and/or deletion of your personal data. In addition, you have a right to lodge a complaint in relation to the processing of your personal data to the Swiss data protection authority: **Federal Data Protection and Information Commissioner**, Feldeggweg 1, CH - 3003 Bern, Tel. +41 58 462 43 95, Website: <https://www.edoeb.admin.ch/edoeb/de/home/der-edoeb/kontakt/kontaktformular.html>.

#### 8. Automated decision making and Profiling

After entering your insurance-relevant data, the application is accepted automatically on the basis of your details. Incorrect or incomplete information may result in the insurance contract not being accepted or being terminated if the information in question is relevant to the insurance company for the conclusion of a contract or a specific claim.

Your insurance-relevant data forms your insurance profile, which is continuously monitored by us in order to maintain your insurance cover or to inform you about product innovations.

## B. When you decide to visit wefox.com, wefox.ch or use the wefox app

When you decide to visit wefox.com, wefox.ch or use our app, please keep in mind that the operator and the responsible person of the website www.wefox.com (hereinafter “**Website**”) and of the wefox application (hereinafter “**App**”) is

### **wefox Insurance AG**

Aeuleustrasse 56,

9490 Vaduz

E-Mail: [dataprotection@wefox.com](mailto:dataprotection@wefox.com)

Generally, it is possible to use the Website without providing your personal data. However, if you want to use certain services from, your personal data will usually have to be processed. For more information about the personal data processed throughout the Website and App, visit: <https://www.wefox.com/de-de/datenschutz>.

## C. When you conclude an insurance contract

If you conclude an insurance contract through us, we will only use the data that you have disclosed to us or that third parties have disclosed to us with your consent. The conclusion and execution of an insurance contract would not be possible without the processing of your data. If you apply for insurance cover, we need the information you provide to conclude the contract and to assess the risk to be assumed. If the insurance contract is concluded, this data will be used to implement the contractual relationship, e.g., for policy issuance or invoicing. In particular, these are first and last name and full address details, phone number, e-mail address, date of birth (date, place, name at birth).

All data provided by you will be used exclusively for the for the conclusion and fulfillment of an insurance contract with the insurance carrier as well as contract administration as described in the insurance terms and conditions,

In the course of your insurance contract relationship, all types of insurance-relevant information may also be used. If the use of special types of personal data is necessary, this data will only be collected and used if or insofar as you have consented to this.

During our contractual relationship, we might receive data of third parties from the customer such as damage reports, which are stored and passed on by us to the extent necessary to process damage reports from customers. In principle, we ask you to provide us with only those data that are necessary or legally required for the respective purpose (e.g. service or damage processing).

## D. In case of brokerage services

We broker insurance contracts (hereinafter referred to as “brokerage”) and/or support and manage existing contractual relationships with you. For this purpose, the data you provide in the context of data collection, implementation of pre-contractual measures, consultation documentation, contract application or conclusion, communication with product providers and contract management is required. Your data will be collected, processed and used for contract-related advice and processing and transmitted by us for this purpose to providers requested by us (e.g., insurance companies, comparison platforms) and stored and used by them to check your application. The associated collection and use of your data is necessary for the fulfillment of the contract with you.

## E. In case of job applications

In case you decide to apply for an open position at wefox, we will process your personal data such as first and last name, e-mail address, address, telephone numbers, position, associated company/office, bank account details, religion, curriculum vitae, criminal record, reference letters or other similarly necessary information for us to be able to hire you. Once the hiring process is successful, you will receive a privacy policy for employees, which shall apply thereon.

The personal data of applicants is processed exclusively by the responsible HR manager and the persons involved in the application process. This includes, for example, the relevant members of management. The disclosure of applicant data to these persons or categories of persons takes place exclusively for the purpose of processing and evaluating applications via Greenhouse.

We store the above-mentioned personal data for as long as necessary to fulfill the purposes for which we collected it, as necessary to fulfill legal, accounting or reporting obligations or as necessary to resolve disputes.

We will delete the personal data you have provided to us as part of your application 3 months after you have received a rejection.

When assessing your job application, we do not use the personal data for exclusively automated decision-making or profiling.

## F. Newsletter and Marketing

We use your contact information for direct marketing purposes. An advertising use of your email address can take place if you have either submitted a corresponding declaration of consent for this or on the basis of our legitimate interest in being able to inform you about comparable insurance products and our associated services. You can revoke your consent by clicking the link provided in each information email and in each newsletter or by sending an email to [dataprotection@wefox.com](mailto:dataprotection@wefox.com). You can submit your advertising objection regarding information emails at any time by email to [dataprotection@wefox.com](mailto:dataprotection@wefox.com).

To subscribe to our newsletter, we use the “double opt-in” procedure. This means that after you have registered, we send you an email to the email address provided, in which we will ask you to confirm that you wish to receive the newsletter. If you do not confirm your registration within 24 hours, your information is blocked and automatically deleted after six months. We also store your IP address and the time of registration and confirmation. The purpose of this process is to verify your registration and, if necessary, resolve any possible misuse of your data.

The only information we require to send the newsletter is your email address. The provision of further, separately marked data is voluntary and is used to address you personally. After your confirmation, we save your email address for the purpose of sending you the newsletter.

To better understand your needs we might conduct different types of marketing activities. As such, with your consent, we may also use your personal data for testing new and further developments of our processing software as well as to advertise our insurance products and for market and opinion surveys.

Furthermore, we also use your data for sales statistics for evaluation purposes. On the one hand, these statistics are used for internal evaluations, and, on the other hand, we also make the statistics available to sales managers. In case you decide not to give or to withdraw your consent, it will have no effect on the contractual relationship with us.

## G. Contacting Us

If you have any questions about the Website, our App or this Privacy Policy, please contact us by email at [dataprotection@wefox.com](mailto:dataprotection@wefox.com).

## H. Changes To Our Privacy Notice

We reserve the right to change this Privacy Notice from time to time. Any changes will be immediately posted on the Website, and you will be deemed to have accepted the terms of the Privacy Notice on your first use of the Website following the alterations. We recommend that you check this page regularly to keep up to date.