

# SWICA Data Protection Policy

## 1. Field of activity of SWICA Healthcare Organisation

SWICA is one of the leading insurance groups in Switzerland in the fields of health, daily sickness benefits and accident insurance for private individuals and companies. It offers mandatory health insurance under the KVG (SWICA Healthcare Insurance Ltd; PROVITA Gesundheitsversicherung AG) as well as mandatory accident insurance under the UVG (SWICA Insurance Ltd) and private-law insurance solutions in accordance with the Insurance Contract Act (VVG). While carrying out its activities and living up to its legal obligations, SWICA processes and manages information about its data subjects (e.g. customers, employees, suppliers) by collecting it and sharing it with third parties (e.g. contractors, doctors, hospitals, authorities, research institutes including universities and other involved insurers) to the extent necessary and permissible.

## 2. Protecting the privacy of insured persons

SWICA attaches strong importance to protecting the privacy of its customers and other data subjects while carrying out its activities. Accordingly, SWICA's Data Protection Policy aims to fully comply with data protection rules and to continuously improve its ability to protect data and secure information.

## 3. Application of the Data Protection Policy

As a group of companies, SWICA Healthcare Organisation delivers its services through SWICA Healthcare Insurance Ltd, SWICA Insurance Ltd, PROVITA Gesundheitsversicherung AG, and SWICA Management AG.

## 4. Values concerning data protection

- 4.1 SWICA believes that protecting the privacy of its data subjects and being reliable and trustworthy to its business partners are natural priorities and that managing its data with due care is therefore of central concern. It therefore holds its managers accountable for rigorously implementing data protection and information security standards and for enforcing compliance with such.
- 4.2 SWICA ensures that employees are aware of all matters relating to data protection and trains them regularly with a view to providing its customers and business partners with high-quality and professional services that comply with data protection rules at all times.
- 4.3 SWICA informs its data subjects about the steps it takes during data processing and ensures consistent transparency when answering inquiries regarding their rights.
- 4.4 SWICA ensures that the organisational, personnel-related and technological prerequisites for protecting data and securing information always meet statutory requirements.
- 4.5 SWICA monitors compliance with data protection regulations continually and acts appropriately if it becomes aware of any violations. Data protection is therefore the subject of reviews by the internal control system (ICS) and an additional part of the range of tasks of the internal audit unit.

4.6 SWICA maintains a data protection management system in the remit of a dedicated operational data protection officer, who also monitors compliance with data protection rules and advises SWICA on enhancing data protection and training employees. Furthermore, this officer is the contact person for all questions on data protection and participates in all projects concerning data protection to ensure that implementation meets statutory requirements.

4.7 SWICA involves its business partners in its data protection management, for example when drafting contracts and designing processes spanning across units, provided that doing so does not violate the integrity of their remit.

## 5. Terms of use

This Data Protection Policy applies to all business and pre-contractual relationships between SWICA and its data subjects. Furthermore, SWICA's Data Protection Declaration is in effect, which explains data processing at SWICA in detail.

The principles of the SWICA Data Protection Policy and the Data Protection Declaration are available on the SWICA website.

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