

# Data Privacy Information

For our Insurance Clients in the Group Insurance

## EU general data protection regulation (GDPR)

The EU general data protection regulation (GDPR) is valid as of 25 May 2018 in all member states of the European Union. The GDPR standardises the rules for the processing of personal data. This secures the protection of personal data in total and a free data traffic within the European Union is guaranteed. The new rules of the GDPR above all provide for a high degree of transparency with the processing of data and extensive rights of the persons concerned.

You will also find information of the protection of data on our homepage on [www.hallesche.de/datenschutz](http://www.hallesche.de/datenschutz).

These remarks will inform you about the processing of personal data by Hallesche and your rights as per the data protection law.

## Person in Charge for the Processing of Data

Hallesche Krankenversicherung a.G.  
Reinsburgstr. 10  
70178 Stuttgart  
Phone: 0711/66 03-0  
Fax: 0711/66 03-3 33  
e-mail: [service@hallesche.de](mailto:service@hallesche.de)

You will reach the company's data protection officer via mail at the above address or via e-mail on: [datenschutz@hallesche.de](mailto:datenschutz@hallesche.de). With our officer you may also assert your rights as far as the information about the data stored of your person, the correction of your data, if these are not correct or incomplete, the right of revocation as well as the deletion or blockage of your data are concerned, if the levying, processing or usage is not admissible or is not required any more.

## Purpose and Legal Bases of Data Protection

We process your data with regard to the EU general data protection regulation, to the Federal Data Protection Act, the relevant data protection regulations of the Insurance Contract Law as well as all further relevant laws. Above that our company is obliged to stick to the rules of the processing of personal data according to the German insurance industry which specifies the above mentioned laws for the insurance industry. You may call up these in the internet on [www.hallesche.de/datenschutz](http://www.hallesche.de/datenschutz).

If you apply for insurance coverage with Hallesche, we shall require details of you which are necessary for the processing of your insurance contract, such as the policy or the invoicing. We require the details of an event insured against to verify if an event insured against has occurred and how high your claim for reimbursement is.

The GDPR, the German Federal Data Protection Act (BDSG) as well as the Code of Conduct rule the processing of data (such as above all the raising, the registering, the linking, the adapting or changing,

the deletion and the blocking, the transmitting and disclosing, the usage, the destroying) of personal data in connection with the offer, the conclusion and the termination of insurance contracts. These measures of the data protection guarantee for the persons insured that we handle customers' data extremely sensitively and that the basic rights and basic freedom of natural persons are observed and especially their rights of protection of personal data. The conclusion or the implementation of the insurance contract is not possible without the processing of your personal data.

### **The conclusion or implementation of the insurance contract is not possible without the processing of your personal data**

To establish, implement or terminate an insurance contract it is necessary that we process personal data of the person insured which we have been informed of either by you or by an assigned person (e.g. treating doctor) or by the accredited group insurance partner and possibly by the mentoring agent. Among Hallesche, the group insurance partner and the mentoring agent it might turn out to be necessary for the purpose of the execution of the contract and for the customer service to exchange data such as the contract number, general personal and address data as well as the commencement, the extent and end of your insurance contract. A further transfer of your data or use beyond the very purpose of the insurance agreement does not occur. Your health data will not be handed out to the group insurance partner.

Should questions with treating hospitals and doctors become necessary or should the expert's opinion become necessary, we shall inform you beforehand in each individual case and shall ask you for your permission in practice.

The legal basis for this processing of personal data for pre-contract or contractual purposes is art. 6 para. 1 b) GDPR. As far as special categories of personal data (e.g. your health) are required, we shall ask for your consent as per art. 9 para. 2 a) in connection with art. 7 GDPR. If we set up statistics with these data categories, this is carried through on the basis of art. 9 para. 2j) GDPR in connection with § 27 of the German BDSG.

Above that we require your personal data in order to be in a position to set up insurance specific statistics, such as to develop new tariffs or to fulfil the supervisory requirements. We shall also process your data in order to protect justified interests of us or of third parties (art. 6 para. 1f GDPR). This may be necessary in particular to guarantee the IT security and the IT operations, to advertise our own insurance products and the products of ALH-group as well as for market and opinion polls, to prevent and to resolve offences, above all we use data analyses for the recognition of hints which may indicate insurance fraud.

Your data will be processed, stored and filed as per the rules of a due management and electronic filing of books, records and documents as well as the processing for the access of data (GoBD) as well as the fulfilment of statutory obligations, such as supervisory authorities, obligation of filing as per the law of commerce and tax or our obligation of consultation. The legal basis for the processing are the respective legal regulations in connection with art. 6 para. 1 c) GDPR.

If you like to use your personal data for a purpose not mentioned above, we shall inform you in the frame of the legal provisions before.

## **Data Transfer to Re-Insurers**

In order to secure the implementation of the claims it might possibly be necessary that Hallesche involves re-insurers which take over the risk totally or partially. In some cases the re-insurers involve further re-insurers to which they pass on data as well. To enable the re-insurer to get an idea of the risk or the event insured against occurred, it is possible that HALLESCHÉ presents the application or the reimbursement claim to the re-insurer.

If re-insurers have taken over the coverage of the risk, they may control, if Hallesche has assessed the risk or the claim correctly. Furthermore, data of existing coverages / insurance contracts and applications are given to re-insurers so that they may verify, if and to which amount they may take over the risk. Data of existing coverages / insurance contracts may be passed on to re-insurers for the clearance of premium payments and reimbursement claims.

For the purposes mentioned, anonymous or pseudonymised data will be used. As far as personal details are necessary, we shall inform you about the transmission. The re-insurers are obliged to discretion and may only use the data for the very purpose.

If details of the health status become necessary for the verification of the event insured against, your explicit consent is required for the data transmission.

## **Data Transmission to Self-Employed Agents**

If an agent advises you as far as your insurance contracts are concerned, the agent will process the necessary data of application, contract and claims.

As far as it is necessary for consultant reasons regarding the contract the agent servicing the policy holder may receive information about the conditions under which the respective group insurance policy may be accepted. The agent who renders service for this group insurance policy will be informed that the contract has been concluded and which content this insurance agreement has. A possible change of the agent will be agreed upon with the group insurance partner.

Your data may also be used for consultation purposes of possible continuation of insurance coverage in the individual insurance. Either Hallesche directly or the agent of the policy holder will inform you thereof.

A transmission of health data is not affected, unless an explicit consent of the insurance customers in question is given.

## **Data Processing in the Company Group**

Specialized departments of the ALH-group perform certain data processes within the group centrally by one department. As far as an insurance contract between you and one or several companies of the group exists your data may be processed for the administration of your address data, for the customer service by phone, for the processing of your contractual and claim matters, for collection or disbursement or for a common processing of mail by one company of the group only. You will find the companies which participate in a centralized data processing on our list of service providers.

## External Service Providers

We use external service providers for the fulfilment of our contractual and legal obligations. This includes in particular the support of corporate policyholders abroad and the provision of an online platform for corporate clients to manage contracts and portfolios.

Hallesche contractually obliges these external service providers to comply with the regulations on data protection and data security. The technical and organizational requirements and safety measures prescribed in this context have to be guaranteed and controlled by suitable measures. A list of all contractors and service providers to whom we do not have only temporary business relationships can be seen in the attached survey as well as in the current version on our homepage [www.hallesche.de/dienstleisterliste](http://www.hallesche.de/dienstleisterliste). The service providers engaged in the frame of this group insurance contract are mentioned below.

If the handing out of health data may be necessary, we shall not pass on these data without your prior explicit consent or the consent of the commissioned group insurance partner.

## Further Recipients

In addition, we may also transfer your personal data to further recipients, such as public authorities to fulfil our legal obligations of information (e. g. social insurance agency, finance authorities or prosecution authorities).

## Company Portal

The Hallesche company portal is an online platform for corporate clients to manage contracts and portfolios. The platform is provided by the external service provider eVorsorge. The processing of personal data is always based on data protection regulations. It is not transmitted to any other third party.

## Period of Data Storage

We delete your personal data as soon as they are no longer required for the above purposes. With this it may happen that personal data are stored for the period during which claims may be laid towards our company (legal period of limitation of three or up to thirty years). Furthermore, we store your personal data as far as we are legally obliged to do so. Please see the commercial code, the tax code and money laundering act for the respective obligations of proof and storage. The periods of storage last up to ten years after the end of the contract.

## Rights of the Persons affected

You may demand information about the stored data of your person on the above address. Furthermore, you may demand the correction or the deletion of your data under certain circumstances. You will also have the right to limit the processing of your data as well as to issue the data in a structured, usual and machine-readable format.

## Right of Revocation

If we process your data to secure justified interests, you may revoke this processing, if your special situation has arguments against this processing of data.

## Right of Revocation for the Use of Data for Purposes of Advertisement as well as Market and Opinion Research

You have the right of revocation to a processing of your personal data for purposes of direct advertisement. You may revoke this process or use at any time. The revocation is possible at any time and is not subject to a certain form. It is to be sent via mail, fax, e-mail or you may phone Hallesche Krankenversicherung auf Gegenseitigkeit.

## Right of Complaint

You have the possibility to contact the above mentioned data protection officer or a data protection authority. The data protection authority responsible for us is:

Der Landesbeauftragte  
für den Datenschutz und die Informationsfreiheit  
Königstraße 10a  
70173 Stuttgart

## Data Transfer in a Third Country

If we transfer personal data to service providers outside the European Economic Area, the transfer is only effected, if the third country is certified by the EU commission to have a reasonable data protection level or other reasonable data protection guarantees (e. g. binding, in-house data protection regulations or EU standard contract terms).

If the long-term health group insurance contract for coverage abroad includes comprehensively covered expatriates who are liable to tax in the USA, Hallesche is obliged to transfer general personal data to the American Tax Authority (IRS) in order to fulfill the reporting obligations of the "Patient Protection and Affordable Care Act" (PPACA), also known as "Obamacare". For this purpose the use of an upstream service company which cooperate with the tax authority is required. If you do not wish this data transfer, this means a revocation of the approval to the data transfer. However, this leads to the fact that the insurance coverage within the frame of the group contract does not fulfil the mandatory Minimum Essential Coverage (MEC) because of the missing data transfer to the American tax authority and that penalty payments are likely for the person insured. In order to ensure a data protection level similar to European standards, we have reached extensive confidentiality and data protection agreements with the service providers in the USA.

# Data Protection: List of Service Providers

As per: June 2021

## Service Providers (Categories) of Hallesche Krankenversicherung\*

Tasks for which personal data (such as name, address) may be passed on to third parties	
Transferred tasks	Agent/Service Categories
<ul style="list-style-type: none"><li>• Verification of address</li></ul>	<ul style="list-style-type: none"><li>• Address investigator, registration office</li></ul>
<ul style="list-style-type: none"><li>• Catching information at the time of application and procedure</li></ul>	<ul style="list-style-type: none"><li>• Credit reference agencies:<ul style="list-style-type: none"><li>• Schufa Holding AG, Wiesbaden</li><li>• Creditreform e. V., Neuss</li><li>• Arvato Infoscore GmbH, Baden-Baden</li></ul></li></ul>
<ul style="list-style-type: none"><li>• Data carrier/file recovery</li></ul>	<ul style="list-style-type: none"><li>• Waste companies</li><li>• documentus GmbH, Stuttgart</li></ul>
<ul style="list-style-type: none"><li>• Digital communications</li></ul>	<ul style="list-style-type: none"><li>• Serviceware SE, Bad Camberg</li><li>• mailingwork GmbH, Oederan</li></ul>
<ul style="list-style-type: none"><li>• Printing, enveloping and dispatch</li></ul>	<ul style="list-style-type: none"><li>• Printing companies and mailing companies</li></ul>
<ul style="list-style-type: none"><li>• Holding online conferences and providing a conference platform</li></ul>	<ul style="list-style-type: none"><li>• CSN Communication Service Network GmbH, Düsseldorf</li></ul>
<ul style="list-style-type: none"><li>• "fin4u" end customer platform</li></ul>	<ul style="list-style-type: none"><li>• fundsaccess AG, BANKSapi GmbH, München</li></ul>
<ul style="list-style-type: none"><li>• "hallesche4u" end customer platform</li></ul>	<ul style="list-style-type: none"><li>• SDA SE Open Industry Solutions, Hamburg</li></ul>
<ul style="list-style-type: none"><li>• Corporate customer portal for company health insurance</li></ul>	<ul style="list-style-type: none"><li>• eVorsorge Systems GmbH, München</li></ul>
<ul style="list-style-type: none"><li>• Claims management (out of court and court files)</li></ul>	<ul style="list-style-type: none"><li>• Fülleborn Rechtsanwaltsgesellschaft mbH, Hamburg</li><li>• KSP Kanzlei Dr. Seegers, Dr. Frankenheim Rechtsanwaltsgesellschaft mbH, Hamburg</li></ul>
<ul style="list-style-type: none"><li>• Real estate</li></ul>	<ul style="list-style-type: none"><li>• Management companies, caretaking services, tradespeople, settlement companies, architects, specialist lawyers, real estate agents, IT service providers, project developers</li></ul>
<ul style="list-style-type: none"><li>• IT service providers (writing software programmes, user-help-desk, implementation and support of hard- and software, archiving of data which is subject to record retention obligations, system advice and support)</li></ul>	<ul style="list-style-type: none"><li>• External IT service providers</li></ul>
<ul style="list-style-type: none"><li>• Market research (market analysis, service studies, customer surveys, including as part of ratings)</li></ul>	<ul style="list-style-type: none"><li>• Marketing-/market research companies, rating agencies</li><li>• ASSEKURATA (rating agency), Köln</li></ul>
<ul style="list-style-type: none"><li>• Service card producers ("Card for persons privately insured")</li></ul>	<ul style="list-style-type: none"><li>• Giesecke &amp; Devrient GmbH, München</li></ul>
<ul style="list-style-type: none"><li>• Fiduciary activities</li></ul>	<ul style="list-style-type: none"><li>• Trust companies</li></ul>
<ul style="list-style-type: none"><li>• Video consultation (provision of infrastructure for web-based video chats)</li></ul>	<ul style="list-style-type: none"><li>• Flexperto, Frankfurt a. M.</li></ul>

\* List of service providers as per your "Declaration of Data Protection/Declaration of Consent and Release from the Professional Oath of Secrecy"

## Tasks for which health data may also be passed on to third parties

Transferred tasks	Agent/Service Categories
<ul style="list-style-type: none"> <li>Assistance providers (repatriation, visits with doctors and hospitals abroad, medical consultation, health care services/settlements, check of the medical invoices, medical devices)</li> </ul>	<ul style="list-style-type: none"> <li>MD Medicus Assistance Service GmbH, Ludwigshafen</li> <li>Malteser Hilfsdienst gemeinnützige GmbH, Köln</li> <li>Global Medical Management Inc. (GMMI), Pembroke Pines, Florida (USA)</li> <li>Providers of medical devices</li> </ul>
<ul style="list-style-type: none"> <li>Supervision of expatriates abroad (claiming and contractual affairs)</li> </ul>	<ul style="list-style-type: none"> <li>MD Medicus Assistance Service GmbH, Ludwigshafen</li> <li>Henner Group, Paris</li> </ul>
<ul style="list-style-type: none"> <li>Drawing up of medical reports, contracting of medical check-ups</li> </ul>	<ul style="list-style-type: none"> <li>Hallesche medical service</li> <li>Medical experts</li> </ul>
<ul style="list-style-type: none"> <li>Legal advice</li> </ul>	<ul style="list-style-type: none"> <li>Lawyers</li> </ul>
<ul style="list-style-type: none"> <li>Telephone customer service</li> </ul>	<ul style="list-style-type: none"> <li>Webhelp Holding Germany GmbH, Nürnberg</li> </ul>
<ul style="list-style-type: none"> <li>Translating of foreign-language invoices</li> </ul>	<ul style="list-style-type: none"> <li>Translation agencies</li> </ul>
<ul style="list-style-type: none"> <li>Tracking of incoming mail relating to business transactions (electronic and manual)</li> </ul>	<ul style="list-style-type: none"> <li>IBM Deutschland, Ehningen</li> <li>Digi-Texx, München</li> </ul>

## Data processing of the Alte Leipziger – Hallesche Group (ALH Group)

### The ALH Group comprises the following companies

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| <ul style="list-style-type: none"> <li>Alte Leipziger Lebensversicherung a. G.</li> <li>Hallesche Krankenversicherung a. G.</li> <li>Alte Leipziger Versicherung AG</li> <li>Alte Leipziger Holding AG</li> <li>Alte Leipziger Bauspar AG</li> </ul> | <ul style="list-style-type: none"> <li>Alte Leipziger Trust Investment-Gesellschaft mbH</li> <li>Alte Leipziger Treuhand GmbH</li> <li>Alte Leipziger Pensionskasse AG</li> <li>Alte Leipziger Pensionsfonds AG</li> <li>Alte Leipziger Pensionsmanagement GmbH</li> </ul> |
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### Joint processing of master data

- Pursuant to the "Code of Conduct" (behavior rules for the handling of personal data by the German insurance sector), this master data includes name, address, date and place of birth, customer number and insurance policy number, occupation, marital status, legal representatives, information on the kinds of existing contracts, the capacity of the persons involved (e.g. insurance holder, main person insured, contributor, payee), bank details, telecommunication data, blocking notes (regarding advertising and market/opinion research) and other objections, power of attorney and care arrangements, responsible agents.

In order to be able to process matters concerning the execution of applications, registrations, offers, contracts and services quickly, effectively and economically (e.g. the appropriation of mail and incoming phone calls), the master data of the policy holder and main person insured and the insured persons of the ALH Group may be kept in a shared database.

- The data of the various ALH Group companies is otherwise stored and used separately in accordance with the principle of business segregation as required by the supervisory authorities.

### Processing of personal data within the ALH Group

- Certain tasks within the ALH Group are performed Group-wide. These may require the processing of personal data. The processing is then legitimated by Article 6, paragraph 1, point (f), of the GDPR (legitimate interests) or Article 26 of the GDPR (Joint controllers) or Article 28 of the GDPR (Processor) or governed by the responsibilities agreed in the employment contract.

This applies to the following activities:

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|--|--|---|
| <ul style="list-style-type: none"> <li>Company data protection</li> <li>Business organisation</li> <li>Compliance</li> <li>Real estate management</li> <li>Information security officer</li> </ul> | <ul style="list-style-type: none"> <li>Internal auditing</li> <li>IT technology</li> <li>Marketing</li> <li>Human resources</li> <li>Accounting</li> </ul> | <ul style="list-style-type: none"> <li>Legal department</li> <li>Risk management</li> <li>Sales administration</li> <li>Management Board</li> </ul> |
|--|--|---|

**Please note:** in the event that we forward data on to service providers outside of the European Economic Area (EEA), we do so only when the EU Commission has confirmed that the third country offers an adequate level of data protection or when adequate data-protection guarantees (e.g. binding internal corporate data-protection regulations or EU standard contract clauses) are in place. You can request the relevant information from us.