

Privacy policy for the use of the PrismaLife customer portal myPrismaLife

The PrismaLife customer portal myPrismaLife always offers you the highest level of security. To guarantee this, technical security mechanisms and processes have been established. Emphasis was placed on the encryption of communication. As technical security mechanisms are only one part of a successful security strategy, PrismaLife AG considers and integrates information security in all development, project and operational processes.

Transparency is the basis of our self-image. Therefore, in accordance with the relevant legal requirements, in particular the EU General Data Protection Regulation (GDPR), we would like to inform you below about the processing of your personal data in connection with the use of the PrismaLife customer portal and your rights.

The following information refers to the data protection information known to you for your insurance contract and supplements it regarding the use of the PrismaLife customer portal myPrismaLife.

1. Who is responsible for data processing and who can I contact?

PrismaLife AG is responsible for data processing in connection with the use of the myPrismaLife customer portal.

Our contact details are as follow:

PrismaLife AG
Industriering 40
9491 Ruggell
Liechtenstein
Phone: +423 220 01 00
Email address: info@prismalife.com

For data protection matters, please contact our data protection officer at the above postal address or by email: dataprotection@prismalife.com

2. How, for what purpose and on what legal basis is your data processed during and in connection the use of the myPrismaLife customer portal?

2.1. General features of the myPrismaLife customer portal

2.1.1 Description & purposes of the processing of personal data

On the PrismaLife AG website (www.prismalife.com/en/) we offer you our access-protected customer portal myPrismaLife, with which you can view online your offers for PrismaLife AG insurance and we can also have proof of access to your offer.

You cannot submit or send service requests and enquiries when using the myPrismaLife customer portal at the quotation stage. These functions are only activated when an insurance contract is concluded. If you have any questions regarding your offer, please contact your personal intermediary.

2.1.2 Obligation to provide the data / consequences of non-provision

To activate the myPrismaLife customer portal, we process your e-mail address to provide you with your personal login details. Without your e-mail address, we will not be able to provide you with your access data. As part of the activation of your customer portal access, we require your consent to the processing of your health data which are contained in the offer. If you do not give us your consent, we will not be able to provide you with an offer. If you withdraw your consent to the processing of your health data in the myPrismaLife customer portal at the offer stage, your offer data will be deleted and your access to the myPrismaLife customer portal will be blocked.

2.1.3 Legal basis for the processing

The legal basis for the processing of your personal data in the form of the use of the myPrismaLife customer portal at the offer stage is Art. 6 (1) (a), (b) and Art. 9 (2) (a) in conjunction with Art. 7 GDPR (consent to the use of the myPrismaLife customer portal and your consent to the storage and use of your health data).

You can withdraw your consent to the processing of your health data within the myPrismaLife customer portal at any time by contacting us (Art. 7 para. 3 GDPR). Please note the consequences of non-provision described under point 2.1.2.

Where necessary, we also process your data beyond the actual use of the myPrismaLife customer portal in order to protect our legitimate interests or those of third parties in accordance with Art. 6 (1) (f) GDPR, unless outweigh your interests or fundamental rights and freedoms that require the protection of personal data.

These are among others:

- > Examination and optimisation of procedures for needs analysis;
- > Assertion of legal claims and defence in legal disputes;
- > Ensuring the IT security and IT operations of the insurance company, carrying out stress tests, developing new and adapting existing products and systems, migrating data to ensure the sustainability and integrity of the systems and thus, in a broader sense, the processed data;
- > Prevention and investigation of criminal offences, we use data analyses to identify indications that may point to insurance fraud;
- > Measures for business management and further development of processes, services and products;
- > "Compliance" purpose: Compliance with legal and other requirements, such as record-keeping and consulting obligations, audits, compliance with government/agency reviews, responding to legal processes, pursuing legal rights/remedies, managing internal complaints/claims, investigations and compliant behaviour with policies/procedures;
- > Planning, implementation and documentation of internal auditing measures to ensure continuous improvement of our business processes and fulfilment of regulatory obligations.

2.1.4 Storage period

We store your personal data as long as it is required for the above-mentioned purposes. Access to the myPrismaLife customer portal at the offer stage lasts for a maximum of six months. If an offer is accepted, a contract is concluded and you will be subject to the terms described in section 2.2.4 'Storage period'. If an offer is not accepted, your access, the data stored in the offer and your e-mail address will be automatically deleted after six months.

2.2 General features of the myPrismaLife customer portal as part of a contractual relationship

2.2.1 Description & purposes of the processing of personal data

On the PrismaLife AG website (www.prismalife.com), we offer you our access-protected customer portal myPrismaLife, which you can use to view and manage online your contracts. The myPrismaLife customer portal guarantees you secure and encrypted communication and safe transmission of your personal data to us.

The myPrismaLife customer portal is designed for you and us to manage your contracts and use services. After logging into the myPrismaLife customer portal, you will be able to, for example:

- > View the data you stored with us
- > View your contracts
- > make specific changes, such as reporting a move or changing your address or account
- > send us other messages and notifications
- > receive messages from us

If you submit service requests and enquiries when using the myPrismaLife customer portal, these will be forwarded to our internal departments and, if necessary, to your intermediary for processing and answering. If an error occurs, the necessary data will be forwarded to our IT specialists for troubleshooting and rectification.

If you provide an electronic signature when concluding the contract and, if applicable, during our contractual relationship, we collect biometric data (writing speed, writing direction, writing pauses and, if applicable, the amount of pressure) and store or use this data for the creation, implementation or termination of this insurance contract and for the implementation of the PrismaLife customer portal myPrismaLife. For evidence purposes, in the event of a dispute about the authenticity of your signature, we will deposit this data with a notary public who is bound by law to maintain confidentiality for the purpose of asserting, exercising and defending legal claims.

2.2.2 Obligation to provide the data / consequences of non-provision

With your consent to electronic communication and your consent to the processing of your health data via the myPrismaLife customer portal, you provide us, and we provide you with all data in the myPrismaLife customer portal. If you withdraw your consent to electronic communication or revoke your consent to the processing of your health data during the contractual relationship, you will no longer be able to use the myPrismaLife customer portal, and access to it will be blocked. Please note that in this case, with the exception of statutory provisions, fees will be charged for sending on paper informations, declarations and documents relating to your insurance contract. Please refer to your insurance documents for more information on the amount of these fees.

2.2.3 Legal basis for the processing

The legal basis for the processing of your personal data in the form of the use of the myPrismaLife customer portal is Art. 6 (1) (a), (b) and Art. 9 (2) (a) in conjunction with Art. 7 GDPR (consent to the use of the myPrismaLife customer portal and your consent to the storage and use of your health data).

You can withdraw your consent to the processing of your health data within the myPrismaLife customer portal at any time by contacting us (Art. 7 (3) GDPR). Please note that the revocation is only effective for the future. Processing that took place before the cancellation is not affected. Please also consider the consequences of non-provision described under point 2.2.2.

If necessary, we will also process your data beyond the actual use of the myPrismaLife customer portal in order to protect our legitimate interests or those of third parties in accordance with Art. 6 (1) (f) GDPR, unless your interests or fundamental rights and freedoms that require the protection of personal data prevail.

These are among others:

- > Examination and optimisation of procedures for needs analysis and digital communication;
- > Providing existing customers with information on the insurance products they have concluded as well as our own market and opinion surveys, unless they have objected to the use of their data and all other legal requirements are met;
- > Assertion of legal claims and defence in legal disputes;
- > Ensuring the IT security and IT operations of the insurance company, carrying out stress tests, developing new and adapting existing products and systems, migrating data to ensure the sustainability and integrity of the systems and thus, by extension, of the processed data;
- > Prevention and investigation of criminal offences: we use data analyses in particular to identify indications that may point to insurance fraud
- > Measures for business management and further development of processes, services and products;
- > Risk assessment, balancing the risks assumed by PrismaLife AG and ensuring the fulfilment of your claims;
- > "Compliance" purpose: Conformity with legal and other requirements, such as record-keeping and consulting obligations, audits, conformity with government/public reviews, response to legal processes, pursuit of legal rights/remedies, management of internal complaints/claims, investigations and compliant behaviour with policies/procedures;
- > Planning, implementation and documentation of internal auditing measures to ensure continuous improvement of our business processes and fulfilment of regulatory obligations.

2.2.4 Storage period

We store your personal data as long as it is required for the above-mentioned purposes. Personal data may be stored for the period during which claims can be asserted against our company (statutory limitation period of three or up to thirty years). We also store your personal data to the extent that we are legally obliged to do so. Corresponding proof and retention obligations arise, among other things, from the Insurance Supervision Act, the Due Diligence Act and the Money Laundering Act. The retention periods are generally ten years.

Personal data relating to your contracts and the services used are not stored in your browser. This does not include, in particular, photos and documents that you may have saved temporarily on your computer or smartphone before submitting them, or messages that you have downloaded to your end device. The deletion or storage period of this data is your own responsibility.

If the contractual relationship is terminated, you have 60 days to view your data in the myPrismaLife customer portal for this contract. If you do not have another active insurance contract, we will block the access to the myPrismaLife customer portal after this period has expired. We will inform you about the suppression or blocking of your data in the myPrismaLife customer portal as part of the termination of the contractual relationship.

Note: All information, declarations and documents that you and us have exchanged up to that point via the myPrismaLife customer portal will continue to be stored in our policy management system as described above until the expiry of our retention obligations. You can find more details on this in the current data protection information for your insurance contract.

2.2.5 Note on the handling of your access data/personal data

You will receive your corresponding access data for the myPrismaLife customer portal at the start of the contractual relationship. The access data must be kept secret and kept safe from access by other persons.

For documents containing special categories of personal data, we ask you in your own interest to use only the myPrismaLife customer portal and no other contact options (customer contact form or e-mail).

Special categories of personal data are, for example

- > medical data (health data)
- > biometric data
- > genetic data

You are guaranteed encrypted communication and transmission of your personal data via the myPrismaLife customer portal!

2.2.6 Further information

Further information on data processing within the scope of the respective insurance relationship can be found in your insurance documents at www.primalife.com/en/data-protection.

2.3 Recording of page views

When using the myPrismaLife customer portal, the browser used on your device automatically sends information to our website server. This information is temporarily stored in a log file.

The following informations are collected without your intervention and stored until they are automatically deleted:

- > IP address of the requesting computer
- > Date and time of access
- > Name and URL of the file accessed
- > Browser used and, if applicable, the operating system of your computer and the name of your access provider

We process the aforementioned data for the following purposes:

- > Ensuring a smooth connection to the website
- > Ensuring convenient use of our website
- > Evaluating system security and stability
- > Other administrative purposes

2.3.1 Legal basis for the processing of connection data

The legal basis for data processing is Art. 6 (1) (f) GDPR. Our legitimate interest follows from the purposes listed above for data collection. Under no circumstances we will use the collected data for the purpose of drawing conclusions about your person.

2.3.2 Storage period

The connection data for the use of the myPrismaLife customer portal will be deleted after ten years.

2.4. Using the Beeme app

You also have the option of accessing the myPrismaLife customer portal via an app, the so-called Beeme app from Lifeware S.A. in Switzerland, which you can obtain free of charge from many app stores and via a link provided in our myPrismaLife customer portal. With the Beeme app, you always have your login details to hand and no longer have to remember them. After starting the Beeme app on your device for the first time, it generates a random ID and transmits it to the Beeme app provider's server. After successful activation of the Beeme functionality in the myPrismaLife customer portal, PrismaLife AG receives the previously generated ID and another randomly generated ID from the Beeme app provider to be able to establish an assignment. At no time is personal data exchanged between the provider of the Beeme app and PrismaLife. The provider of the app is a company that is independent of us and with which you enter a separate contractual relationship for the use of the app, independent of your contractual relationship with PrismaLife AG. In this respect, please note the terms of use and data protection information of the app provider Lifeware S.A.

3. Use of cookies in the customer portal

Cookies" are generally used to optimise user behaviour and for evaluation purposes. Cookies are small text files that are stored locally in the visitor's Internet browser and are used to recognise user's IP address. They help to determine the frequency of use, the number of users and the language settings of our PrismaLife customer portal. PrismaLife AG currently uses such cookies. You can find further information at: www.primalife.com/en/cookies/

4. Data transfer to a third country

If we transfer personal data to service providers outside the European Economic Area (EEA), the transfer will only take place if the third country has been confirmed by the EU Commission as having an adequate level of data protection or if other appropriate data protection (e.g. binding internal data protection regulations or EU standard contractual clauses) are in place. We transfer, for example, personal data to our IT provider based in Switzerland. The EU Commission has confirmed an adequate level of data protection in Switzerland. You can find detailed information on this in the Commission's decision here: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32000D0518>

In addition, we have concluded an order processing contract with our IT provider, including the standard contractual clauses of the EU Commission.

You can request detailed information on this and on the level of data protection using the contact details above.

5. Your data protection rights

Under the General Data Protection Regulation, you as the data subject have the right of access under Art. 15 GDPR, the right to rectification under Art. 16 GDPR, the right to erasure under Art. 17 GDPR, the right to restriction processing under Art. 18 GDPR and the right to data portability under Art. 20 GDPR. There is also a right of cancellation in accordance with Art. 7 para. 3 GDPR and a right of objection in accordance with Art. 21 GDPR. If you make use of your above-mentioned rights, we will check whether the legal requirements for this are met. In addition, you have the right to file a complaint with a data protection supervisory authority (Art. 77 GDPR).

The data protection supervisory authority responsible for us is:

Datenschutzstelle Liechtenstein
Kirchstrasse 8
P.O. Box 684
9490 Vaduz
Liechtenstein

You can exercise all your rights by sending an email to dataprotection@prismalife.com by post via the contact form on our website or via the myPrismaLife customer portal.

In order for our response to actually be addressed to you as the data subject, you must identify yourself or contribute to the identification of your person.

6. To what extent is there automated decision-making in individual cases?

In principle, we do not use fully automated decision-making pursuant to Art. 22 GDPR to establish and operate the myPrismaLife customer portal. Should we use these procedures in individual cases in the future, we will inform you of this separately if this is required by law.

Information about your right to object in accordance with Art. 21 of the General Data Protection Regulation (GDPR)

1. Individual right of objection

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on Article 6(1)(e) GDPR (data processing in the public interest) and Article 6(1)(f) GDPR (data processing on the basis of a balancing of interests).

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or the processing serves the establishment, exercise or defence of legal claims.

2. Right to object to the processing of data for direct marketing purposes

In individual cases, we process your personal data for the purpose of direct marketing. You have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising.

If you object to processing for direct marketing purposes, we will no longer process your personal data for these purposes.

The objection can be made without any conditions as to content or format and should be addressed to:

PrismaLife AG
Industriering 40
9491 Ruggell
Liechtenstein
Email address: info@prismalife.com

If you have any questions about this privacy policy, please contact PrismaLife AG using the contact details above.

Note:

This "Data protection information on the use of the PrismaLife customer portal "myPrismaLife" may be updated at a later date due to changes, e.g. in legal provisions. You can obtain the latest version of this privacy policy and the service provider list on the PrismaLife AG landing page at www.prismalife.com/en/data-protection/.