

Zurich ZIPSE

At Zurich your data also have unbeatable protection

Protecting our customers also means maintaining our commitment to transparency in our use of their personal data. So we would like you to know all about everything in the new General Data Protection Regulation applicable from 25 May 2018.

The new General Data Protection Regulation introduces changes to previous data protection legislation in order to enhance protection mechanisms and give people more control over their personal data.

At Zurich we would like to tell you about all the measures we are going to put in place to ensure your personal data are perfectly protected.

Who is the controller?

Zurich Insurance plc, Sucursal en España is the controller.

You can contact us about this issue whenever you want by writing to Agustín de Foxá 27, 28036 Madrid, or emailing protecciondedatos@zurich.com.

You can also contact Zurich's Data Protection Officer by emailing esz_dpd@zurich.com.

What does Zurich use personal data for?

If you are a Company

Zurich uses personal data for:

- Managing the contract. This is also applicable to the personal data of the representative of the Company (an individual) executing the contract and to any other personal data of third parties that the policy holder provides to the insurer with. This may include the insured, beneficiary or any other person.
In this last situation, the policyholder warrants that prior to such provision they have informed the data subject about the processing of their data in the terms set out in this site.

When the policy is executed by the policyholder for the benefit of a third party, the lawful basis for processing the data of the insured/beneficiaries including any health data is the existence of a contractual relationship as they are required to execute the contract.

In this case the policyholder/insured contractually assumes the obligation to inform such third parties about the processing of their personal data by the insurer.

-Lawful basis: The performance of the contract and insurance regulations, mainly the Royal Decree 1060/2015 on the organisation, supervision and solvency of insurers and reinsurers in relation to prior insurance information.

If you are an individual

Zurich mostly uses personal data for the following purposes:

- Managing the contract.
- Preventing fraud.
- Adjusting prices.
- Sending marketing messages.
- Profiling or segmenting profiles.

The information we ask you for is essential to:

- Manage the products and services you ask for and take out with Zurich Insurance plc, Sucursal en España. The data are needed to perform the insurance contract, implement, supervise and maintain the contractual relationship and carry out and handle any transactions derived from it.

- Lawful basis: The performance of the contract and insurance regulations, mainly the Insurance Contract Act, the Organisation, Supervision and Solvency of Insurers and Reinsurers Act and prevention of money laundering and terrorist financing regulations.

- Prevent fraud based on the legitimate interest.
- Adjust the price also based on the legitimate interest derived from credit information system regulations.

Likewise and unless you object, we may also use your data to:

- Send you Zurich Insurance plc, Sucursal en España marketing messages by any electronic medium.
- Send Zurich Vida, Compañía de Seguros y Reaseguros, S.A. –Sociedad Unipersonal–, marketing messages on paper or by phone.
- Enable the insurer to manage the contract by profiling the personal data directly supplied by the data subject (“basic profiling”) or data resulting from using and managing the products taken out.

All these grounds are based on a legitimate interest.

Remember that in all these cases based on a legitimate interest, you can always exercise your right to object if you aren’t happy with our processing by emailing protecciondedatos@zurich.com.

In addition, if you have opted in we may:

- Send you marketing messages by any electronic medium Zurich Vida, Compañía de Seguros y Reaseguros, S.A. –Sociedad Unipersonal–, or other companies legally related to it.
- Profile or segment profiles for marketing purposes using own and third party data (including insurers in the Group).
- Release your data and any profiles obtained to Zurich Group companies in the insurance and pension industry so they can send you marketing messages by any medium (electronic and non-electronic) about their products and services.

What does Zurich use customer profiling for? (Only applicable in individuals)

Zurich Insurance plc, Sucursal en España uses personal data to evaluate particular aspects about you, mainly to calculate the price of the insurance and adjust the renewal price based on your claims history in line with its underwriting policy. We also use this information for fraud prevention.

When we send or show personalised messages or content, we may use techniques called “profiling”, that is to say any form of automated processing of personal data which consists of using that data to evaluate certain personal aspects of an individual. In particular we may use them:

- To send personalised messages that best suit your needs, situation and interests.
- If you have opted in, to propose sending you special offers for the group’s insurance products which may be of interest to you.
- To analyse product and service quality in relation to your level of satisfaction.
- For internal purposes to manage these messages more efficiently and at the same time offer you a differential value proposition.

All of the above is defined as “profiling”. Remember that you have the right to object to your personal data being processed based on profiling in certain circumstances.

Zurich does not use automated individual decision-making, in other words performing this type of profiling but in an automated way (without intervention by a human who might decide otherwise) and based on individualised information about the customer that might lead to adverse legal consequences for the person without their consent.

How long does Zurich retain personal data for? (Applicable for companies and individuals)

Once the contractual relationship and any actions derived from the contract (such as a claim) have been completed, your personal data will be kept for the time needed for Zurich to comply with its legal or statutory obligations during the limitation periods specified in prevention of money laundering legislation whether civil or criminal. For example: in certain cases after the termination of the policy we may retain your personal data for 15 years for civil actions.

In the case of offers which have not led to a subsequent contract, we retain your data for two months which is the period during which we agree to maintain the price we offered.

If you exercise your right to cancel, we will delete your data as soon as possible and as applicable.

Who can access the data? (Applicable for companies and individuals)

We may share your personal data with:

1. Authorities or official bodies which we are legally obliged to notify, such as the Directorate General of Insurance and Pension Funds, the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences, SINCO, etc.
2. Files relating to compliance with or breach of monetary obligations in order to learn the data subject’s creditworthiness.
3. Courts and law enforcement agencies if we are required to transfer personal data.
4. The Group’s organisations in the insurance and pensions industry and third-party organisations in the insurance and pensions industry with which we have distribution or marketing network transfer agreements as set out above, and only in cases where the data subject has agreed to such data transfer or based on a legitimate interest.

Likewise, in the performance of the contract your personal data may be disclosed to reinsurers, co-insurers and other participants in the contract's operations such as repairers, loss adjusters, etc.

Your personal data may also be processed on our behalf by our service providers. Zurich selects its providers based on European quality standards and only gives them the information they need to perform the service. We also require them not to use your personal data for any other purpose. We always do our best to ensure that all third parties with which we work maintain the security of your personal data. Zurich does not sell your personal data.

In the following table you can see the main categories of third-party service providers which require access to your personal data broken down by the company's in-house unit which may require the service provision:

- Providers that support platforms and information systems which may consist of computer consulting services, licensing, infrastructure support, maintenance services or telecommunications services.
- Claims: providers that support claims handling such as legal and advisory services, medical services, etc.
- Marketing and communications: providers that support sending group messages, whether digital or physical, graphic and audiovisual design, communication agencies, event organisation services, etc.
- General services: support for the custody of documentation, digitisation or trusted third parties, printing, etc.

What rights do you have for protecting your data? *(Applicable for companies and individuals)*

The data subject may exercise their right to access, rectify and erase data and other rights as shown in the table below:

Rights	Content	Service channels
Access	You can view your personal data stored in files owned by Zurich Insurance plc, Sucursal en España	
Rectification	You can modify your personal data when they are inaccurate.	protecciondedatos@zurich.com or at: C/Agustín de Foxá 27, 28036 Madrid
Erasure	You can ask us to delete your personal data	
Objection	You can ask us to delete your personal data.	
Restriction of processing ⁽¹⁾	You can ask to restrict our processing of your personal data in the following cases: <ul style="list-style-type: none"> • While verifying the accuracy of your data when you contest it. • When the treatment is unlawful, but you object to the erasure of your data. • When Zurich Insurance plc, Sucursal en España no longer needs to process your data but you need them to exercise or defend legal claims. • When you have objected to the processing of your data for the performance of a task in the public interest or to meet a legitimate interest pending verification whether our legitimate grounds for the processing override yours. 	
Portability ⁽¹⁾	You may receive in an electronic format the personal data you have supplied to us and any gathered in your contractual relationship with Zurich Insurance plc, Sucursal en España and also transmit them to another organisation.	

(1) Available from 25 May 2018

If you believe that we have not processed your personal data in accordance with the regulation, you can contact our Data Protection Officer at esz_dpd@zurich.com

You may also make a complaint to the Spanish Data Protection Agency (www.agpd.es).

To exercise your rights, enclose or attach as applicable a copy of your ID or equivalent document in proof of your identity to your request.

You can exercise these rights free of charge.

In addition you can withdraw your consent at any time without this affecting the processing request by emailing: protecciondedatos@zurich.com or writing to Agustín de Foxá 27, 28036 Madrid.

Remember to enclose or attach as applicable a copy of your ID or equivalent document in proof of your identity to your request.