Data protection provisions

Version 11.2026

A responsible approach to dealing with your personal data or person-related data is important to us, and protecting your privacy is our top priority. We take utmost care with the data we use to carry out our activities. We strive to ensure the greatest possible degree of data security in the information technology we use and only collect the data that is absolutely necessary. We take appropriate technical and organizational security measures (e.g. encryption and/or pseudonymization of your personal data, internal directives, confidentiality statements, and checks) to protect your personal data against manipulation, loss, destruction, or access by unauthorized parties. These measures are based on international standards; they are therefore subject to regular review and adjusted if necessary. Our employees receive regular training in data protection matters and must comply with specific confidentiality obligations. In addition, we monitor compliance with the data protection provisions on a continuous basis. This also applies to the data processors we have commissioned.

In this Privacy Policy, we explain how we collect and process personal data, the purpose for which we do this, who has access to your personal data, for how long we process your data, what rights you have in this connection, and how you can contact us.

This Privacy Policy contains important statements about data protection as well as your right to decide when and within what limits your personal data is used (“informational self-determination”). These data protection provisions are not a component of your contract. They may be amended over time, in particular should we implement changes in our data processing or if new legal requirements come into effect. Acts of data processing are generally governed by the version of the Privacy Policy in place when the data processing act began. The German version is the legally authoritative version and serves as the basis for all language versions of our data protection provisions.

This Privacy Policy does not contain an exhaustive description of our data processing activities, and individual matters may be regulated in whole or in part by specific privacy policies or other specific information.

We explain how we and other companies in the AXA Group process personal data in the area of occupational benefits insurance in a separate privacy policy under Data protection provisions for occupational benefits insurance.

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1.
Information on data protection

Personal data or person-related data (hereinafter also “data”) as referred to below is any information relating to an identified or identifiable person (e.g. name, date of birth, email address, IP address). Information that has been anonymized or aggregated and cannot (or can no longer) be used to identify a specific person is not deemed to be personal data in this sense.

“Data processing” refers to all handling of personal data including the collection, storage, use, disclosure, altering, archiving, and deletion of data.

The legal basis and purpose of processing your data is primarily the initiation and/or performance of the insurance contract. Furthermore, we base the processing of data on the existence of a legal obligation and/or consent (from you or from a person you have authorized) as well as on overriding legitimate interests on the part of AXA (i.e. specifically in order to pursue the purposes described and associated objectives as well as implement corresponding measures).

The processing of your personal data is based on the principles of accuracy, lawfulness, transparency, data minimization, proportionality, responsibility, and data security.

Our Privacy Policy is based on the requirements of the Federal Act on Data Protection (FADP), the implementing ordinance (OFADP) and, where applicable, other applicable data protection legislation on a case-by-case basis (e.g. EU General Data Protection Regulation (GDPR)). These data protection provisions do not contain an exhaustive description of our data processing activities; individual matters may be governed in full or in part by specific information (with or without reference to these data protection provisions). There are exemptions from the duty to provide information under data protection law: The latter does not apply if the information is not possible or if disproportionate effort is required, if you have already been notified about the data processing, if processing is provided for by law, or if we are legally bound to maintain confidentiality.

If you wish to take out a contract with us, you need to provide us with all the information required for acceptance and implementation of the business relationship as well as for performing the associated contractual obligations. Without this data, we will not be able to conclude a contract with you, or to perform the contract and/or pay benefits. In specific cases, we collect your data from third parties or receive your data from third parties (see section 1.4.3 Indirect data collection).

If you wish to take out an insurance policy on behalf of another person (e.g. family members) or provide us with data on other people (third parties, e.g. beneficiaries), we assume that you are authorized to do so and that this data is correct. Please notify such third parties of the processing of their data by us and ensure that such persons are familiar with our data protection provisions or relevant product information.

1.1. Data controller

The following AXA companies (also referred to in this Privacy Policy as “AXA” or “we”/“us”) are responsible for data processing:

1.1.1. Business activity in Switzerland

- In connection with all insurance lines with the exception of individual and group life insurance policies and legal protection insurance:
  AXA Insurance Ltd, General-Guisan-Strasse 40,
  CH-8400 Winterthur
- In connection with individual and group life insurance policies:
  AXA Life Ltd, General-Guisan-Strasse 40,
  CH-8400 Winterthur
- In connection with legal protection insurance:
  AXA-ARAG Legal Protection Ltd, Ernst-Nobs-Platz 7,
  CH-8004 Zurich

1.1.2. Business activity in the Principality of Liechtenstein

- In connection with all insurance lines with the exception of individual and group life insurance policies and legal protection insurance:
  AXA Insurance Ltd, Zollstrasse 20, FL-9494 Schaan
- In connection with individual and group life insurance policies:
  AXA Life Ltd, Zollstrasse 20, FL-9494 Schaan
- In connection with legal protection insurance:
  AXA-ARAG Legal Protection Ltd, Ernst-Nobs-Platz 7,
  CH-8004 Zurich

1.2. Data categories

1.2.1. Personal information and contact data

We define personal information and contact details as the basic data that we require in addition to the contract data (see section 1.2.2) for the purpose of processing our contractual and other business relationships. This data includes, for example, first and last name, gender, date of birth, age, marital status, language, nationality, telephone number, email address, job title, place of citizenship, ID, passport, or foreigner’s ID number, social security number, and digital/electronic signature.

1.2.2. Customer and contract data

This is information that arises in connection with a potential or actual insurance contract or its termination.

This data includes, for example, the type and date of the contract conclusion, as well as information related to its processing and administration (e.g. information related to invoicing, consulting, and customer service). Contract data also includes information relating to complaints and contract adjustments, as well as information on customer satisfaction, which we may collect through surveys, for example.

1.2.3. Data on behavior and preferences
This includes information about personal behavior, for example how the AXA website, AXA.ch, and associated services (hereinafter "website") are used, as well as data on personal preferences and interests, as well as the location, time you enter or leave a building, protocol data, and log data, for instance.

1.2.4. Financial and payment data
This is data relating to financial circumstances, payments, and the enforcement of claims. This includes credit ratings, payment details, tax identification numbers, mortgage details, premium payments and outstanding payments, reminders, and credit balances.

1.2.5. Data pertaining to any claims/benefits/legal cases
This includes information relating to the receipt of data and the processing of insurance cases and in connection with other benefits. Such information may comprise claim notices, medical reports, diagnoses, investigation reports, invoices, data relating to injured third parties, pension dates, photos, etc.

1.2.6. Health data
This includes particularly sensitive personal data relating to the physical or mental health of an individual, based on which information about their state of health is obtained. Such data can be gathered within the scope of processing insured events, for example. It includes diagnoses, medical reports, sick notes, illnesses, and/or other physical or mental impairments.

1.2.7. Other particularly sensitive personal data
Other particularly sensitive personal data includes, for example, data on views or activities relating to religion, values, opinions, politics, or labor unions, data on an individual's health, personal sphere, race or ethnicity, genetic information, biometric data clearly identifying an individual, as well as data relating to administrative or criminal proceedings or sanctions.

1.2.8. Communication and technical data
This is data relating to our online and telephone communications with you. If you contact us via a contact form, by email, telephone, chat, letter, or other means of communication, we collect the data exchanged between you and us, including your personal information and contact details. If we record telephone calls, we will inform you in advance. Communication data includes the manner, location, and time of communication and, as a rule, its content. Examples include information in emails and letters from you.

Technical data includes, for example, IP addresses, metadata, logs recording the use of our systems, IP packets, and other technical identification data.

1.3. Pupose of data processing

1.3.1. General principles
Personal data that you have provided to us or that we have lawfully received from companies in the AXA Group, or from partners, brokers, intermediaries, and other parties, is initially processed by us for the purposes set out below and/or purposes associated with them and underlying objectives. Where a legal relationship subject to the EU General Data Protection Regulation (GDPR) exists, the specified legal basis applies (for more information see also section 1.3.10 Legal basis pursuant to GDPR). Further information can be found in Part 2 et seq. – Part 2. Using the website

1.3.2. Advice, quotation, and insurance contract
We process your data in the context of your request for advice, pre-contractual measures, provision of the quotation, and finally for the processing, administration, and any termination of the insurance contract. The contract cannot be concluded without your data.

For example, we use your contact details – including the details of any co-insureds – to carry out pre-contractual investigations and be able to contact you. We use your application data (including health data, if applicable) in order to assess the risk we will be accepting as well as calculate the premium. We require your customer data for contract management purposes and your payment information in order to collect your premium on time.

We process data from external providers in order to calculate your premium as well as check your creditworthiness. The processing of this data is permitted on the basis of the insurance contract.

Please also be aware that our premiums may relate to automated calculations that analyze various criteria concerning insured persons or property. This enables us to determine the insurance risk in more precise terms. We place a strong emphasis on fair insurance terms, however, in that the analysis always relates to customer segments and not to the individual insured person.

In some circumstances, your consent may be necessary when querying sensitive data requiring particular protection, such as health information. In this case, we process the data solely on the basis of the consent granted by you for the purpose of performing the contract.

If required for contract processing purposes, we disclose data – though only that which is strictly necessary – to cooperation partners, co-insurers, reinsurers, other insurers involved, previous or subsequent insurers, insurance intermediaries/brokers, service providers, pledge holders, debt collection companies, authorities, and/or external experts that constitute the insurance chain. Furthermore, we notify third parties to which cover was confirmed (e.g. relevant authorities) about the suspension, amendment, or termination of the insurance relationship.

Processing is permitted on the basis of the insurance contract, including in the event that it is not taken out. If we collect sensitive personal data that requires particular protection, such as health data, we may ask for your express consent in order to process it.

The data must be retained for at least 10 years after termination of the contract. Your data will be erased once the relevant retention period has elapsed.

1.3.3. Claims, benefits, and legal cases
We process your information for the purpose of assessing, reviewing, and processing claims, benefits, and legal cases. It is not possible for us to review your claim, benefits, or legal case unless we have your data.

For example, we use your personal information and contact details – including the details of any co-insureds – in order to contact you. We require your customer information in order to manage claims, legal cases, and benefits; we require any information on claims or legal cases (including health data, if applicable) – such as notices of loss or legal cases, investigation reports, and invoices – to process your claim, benefits, or legal case; we also need your financial and payment data to pay out benefits, for example.

For claims processing and accident analysis purposes in the case of traffic accidents, data recorded directly by the insured vehicle can be read for the purpose of determining the events that led to the damage or to identify the consequences of the loss when a loss event occurs. AXA decides based on the notification of the claim whether the data needs to be read. Depending on the manufacturer, this includes information such as speed, acceleration, delay, date, and time.

In connection with a claim or insured event, we may obtain any relevant information from, and inspect the relevant files of, other insurance companies, authorities (police or investigating authorities, department of motor vehicles offices, or similar public offices), as well as from motor vehicle manufacturers and other third parties. If necessary, you must authorize the above-mentioned offices to disclose the relevant information or release the doctor from their obligation to maintain patient confidentiality; see also Art. 39 of the Insurance Contract Act (ICA) and Art. 62 FADP.

In some circumstances, your consent may be necessary when querying sensitive data that requires particular protection, such as health information. In this case, we process the data solely based on the consent granted by you for the purpose of processing the claim, legal case, or benefit.

If required for processing the claim, legal case, or benefit, we disclose data – though only that which is strictly necessary – to third parties. Such third parties – cooperation partners, co-insurers, reinsurers, subsequent or other insurers involved, or previous insurers, insurance intermediaries/brokers, service providers, pledge holders, debt collection companies, authorities, lawyers, external experts, doctors, authorized parties, and/or claims handlers – constitute the insurance chain. In addition, for the purpose of enforcing the right of recourse and contractual recourse claims, information may be supplied to liable third parties and their liability insurer – including abroad. AXA-ARAG does not provide AXA with any information about legal cases if this could prejudice the insured.

Processing is permitted on the basis of the underlying insurance contract. If the processing of your personal information is based on consent, we process the data in the context of such consent (e.g. when disclosing particularly sensitive personal data to third parties).

The data must be retained for at least 10 years after the claim is settled. Your data will be erased once the relevant retention period has elapsed.

1.3.4. Insurance fraud

We process your data for the purpose of automated or non-automated detection, prevention, and combating of insurance fraud.

For example, we use your contract, claims, and benefits data, as well as recorded phone calls, and analyze them in order to identify any suspicious patterns. For this purpose and for your and our protection against criminal or fraudulent activities, we may also carry out profiling. (see section 1.5.1. Profiling).

In connection with the identification of misuse – and the filtering out of suspicious cases – we exchange data with external cooperation partners and other insurance companies and investigators. If consent has been provided by the person concerned, we respond to inquiries from other insurance companies regarding their customers if there is a suspicion of insurance fraud. For example, we provide information about existing policies and previous claims. Information is only provided to authorities if there is a legal obligation to do so.

In the case of policyholders whose registered office or place of residence is in Switzerland, we can also make inquiries to the reference and information system (HIS) and, in the case of motor vehicle claims, to Car Claims Info.

- **HIS:** To prevent and detect insurance fraud, we have additionally affiliated ourselves with the reference and information system (HIS) provided by SVV Solution AG. Participating insurance companies report specific circumstances indicating the need for in-depth examination of a loss event and may request relevant reports from other participating insurance companies. Information from the HIS is only used in connection with investigating the claim.Angaben aus dem HIS werden nur im Zusammenhang mit der Schadenprüfung verwendet. Additional information about the HIS system and your corresponding rights can be found in the privacy policy for HIS | SVV Solution AG (in German). All reports are deleted automatically 7 years after the date of the loss event.

- **Car Claims Info:** For the purpose of combating fraud in relation to motor vehicle insurance, we send vehicle-related claims data to SVV Solution AG for recording in the electronic database «Car Claims Info». This makes it possible to check whether a registered vehicle claim has already been paid out by another insurance company. If fraud is suspected, then the companies may exchange relevant data. Additional information about Car Claims Info and your corresponding rights can be found in the privacy policy for “Car Claims Info” | SVV Solution AG (in German).

The processing is necessary due to AXA’s legitimate interests in maintaining the technical and financial equilibrium of the product, the industry, or the insurance company itself, in particular the prevention of fraud and the protection of AXA’s assets.

1.3.5. Legal services and compliance

We process your data in order to meet regulatory and legal obligations, and to guarantee that laws, guidelines, standards, and internal directives are complied with.

In particular, we process your data for the purpose of combating money laundering, terrorist financing, as well as bribery and corruption. In addition, we process your data for legally required disclosure duties with the aim of preventing, detecting, and investigating criminal offenses and other violations. This also includes disclosure, information, and reporting obligations under supervisory and tax law. For these purposes, we process, in particular, personal information and contact, customer, contract, financial, payment, communication, and technical data, and, in some circumstances, also behavioral data from employers and their contact persons, from self-employed persons, and possibly from insureds.

Furthermore, your data is regularly checked for negative reporting as well as against the data contained in the sanctions lists of the United Nations, European Union, Switzerland's State Secretariat for Economic Affairs, the UK finance and economics department, as well as the US Office of Foreign Assets Control (OFAC).

In the case of individual checks where specialist technical expertise or in-depth knowledge is required, we may enlist cooperation partners or other third parties to assess and/or process the case. In addition, as a member of the AXA Group we are required to report specific serious compliance and security incidents to the Group and share them with the relevant departments.

Processing for this purpose is primarily based on the fulfillment of legal obligations in the areas mentioned above. The legal obligations may relate to Swiss and Liechtenstein law, on the one hand, but also to foreign regulations to which we are subject, on the other. In addition, we include here sector standards, rules with regard to self-regulation, rules on in-house corporate governance, as well as instructions and requests from authorities. We also have a legitimate interest in complying with and enforcing such requirements, which may also serve as a legal basis for our processing.

The data must be retained for at least 10 years. Your data will be erased once the relevant retention period has elapsed.

1.3.6. Customer surveys and marketing

We process your data for customer survey and marketing purposes, so that we can inform you about our products and services. "Marketing purposes" are any AXA activities aimed at the acquisition of new customers or deepening of existing customer relationships.

As part of our market research activities, we collect, process, and use your data exclusively for scientific and market research purposes, in compliance with the requirements of Swiss data protection law. Your data will be handled confidentially and only evaluated anonymously. When conducting surveys for our internal clients, we only provide them with aggregated results of the surveys, without sharing your personal data. Your data will only be collected, processed, and used to the extent necessary for conducting the market research permitted by law and which you have requested. The data collected will not be passed on to third parties.

For example, we use data about your behavior, preferences, and contract for analysis purposes with the aim of upgrading existing products, offering them to you, as well as developing new AXA Group products and services, including non insurance-related.

In order to contact existing and potential customers through marketing measures which could be of interest to them, we process not only personal information and contact data but also other data to help us determine or personalize the target audience, content, and sending of marketing messages. This also includes data from interactions with us, e.g. regarding usage behavior on our website as well as data from other public sources.

For individualized and targeted advertising purposes, as well as to provide you with offers and cater to your needs more effectively, we may also create personality profiles for you and assign you to a specific advertising group.

We do **not** use any sensitive data requiring particular protection, such as health data, for your personality profile. Specific marketing measures may be implemented by data processors and cooperation partners we have commissioned, and by common controllers or other third parties, or in cooperation with them.

You can object to direct marketing measures and personalized advertising at any time in accordance with section 1.8.7. To that end, you can contact the Data Protection Consultant directly (see section 1.9.1. Data protection consultant / data protection supervisory authority). You also have the following options:

- General contact / AXA (AXA.ch/en/private-customers/contact-services/contact/general-contact.html)
- AXA 24-hour helpline 0800 809 809

Processing for this purpose is primarily based on our legitimate interests, in particular those relating to understanding customer behavior and preferences, improving our products and services, and conducting market studies. If we obtain your consent for processing for this purpose, this consent (also) constitutes the legal basis.

1.3.7. Statistics and science

We process your data for general and insurance-specific statistical analysis, and for risk management as well as market research purposes.

For example, we use your personal information and customer data as well as financial, claims, and benefits data to develop our conditions and premium rates and, in general terms, for the further development of our insurance business, in particular in relation to artificial intelligence (AI). Furthermore, we use your claims data for analysis on the topics of road safety, to prevent accidents in the home, and to identify the effectiveness of fire protection measures.

We use market and opinion polling opportunities in order to develop our existing products and services (including our website) as well as identify needs and aspirations, thus enabling us to create an optimized offering. To that end, we use your contact, contract, and customer data as well as analyze how you navigate our website and what products are used by which groups of people and in what way.

This gives us an indication of the market acceptance of existing products and services as well as the market potential for new products and services. In addition, we use information from customer polls, surveys, and studies as well as other information, e.g. from the media, social media, internet, and other public sources. Within this context we may also obtain data from third parties or cooperation partners.

If possible, we use anonymized data for our analysis and also anonymize or pseudonymize the data over the course of the statistical process.

In specific instances of statistical or scientific analysis or research work, we obtain data from third parties and merge it with our own data. In addition, data may be disclosed to data processors, co-operation partners, common controllers, or other third parties for the purpose described. For example, market research institutions may be appointed to carry out a telephone survey of customers. The data disclosed are processed by the relevant company for a specific purpose.

Processing for this purpose is based on our legitimate interests, in particular those relating to appropriate corporate governance and development as well as improving our products and services.

1.3.8. Job applications

If you apply for a job with us, we will process your data in order to proceed with the application. Without this data we will be unable to assess your application and decide whether you are suitable for the position concerned.

For example, we will use your contact details in order to schedule appointments with you. We will collect personal information, such as the information contained in your resume, and process data from references and educational qualifications. Alongside this essential information, you will have the opportunity to provide us with additional information for the application process. We will use the data provided to us in order to assess your application and reach a decision.

As a job applicant, you can use the AXA application platform to find out about vacant positions at various AXA companies in Switzerland and apply electronically. This covers the following companies, including their respective sales force:

- AXA Insurance Ltd
- AXA Life Ltd
- AXA-ARAG Legal Protection Ltd
- AXA Group Operations Switzerland AG
- AXA Liabilities Managers Switzerland AG
- AXA GIE, Paris, Winterthur branch, Switzerland

Your application data will only be shared with persons who are involved in the application process, such as recruitment managers and line managers. In addition, your data may be disclosed to authorities in the event of a statutory duty of notification.

When applying for a job, you will be asked whether your data should be used solely for the purpose of the current application process (“job-based consent”) or whether it may be retained to inform you of future job opportunities that match your profile (“time-based consent”).

With “job-based consent,” your application data will be archived 30 days after the end of the application process. With “time-based consent,” your data is added to the AXA community and archived six months after your last login to the application portal (a notification is sent to the data subject 30 days before archiving).

We store the data you submit during the application process only for as long as necessary. If you select “time-based consent,” your application data will be deleted 18 months after the application process is completed. With “job-based consent,” the data will be deleted 13 months after the end of the application process.

If your application leads to the conclusion of an employment contract, the data will be stored and used as part of the normal organizational and administration process as well as for the management of the employment relationship. Further details are set out in the information accompanying your employment contract.

1.3.9. Other purposes

Furthermore, we process your information for other purposes including in the context of our internal procedures and for administration, for training, and quality assurance purposes, to carry out events, for the protection of our customers, employees, and other persons, and to protect AXA’s data, secrets, and assets, as well as any data, secrets, and assets that have been entrusted to AXA.

Data processing is permitted on the basis of our overriding legitimate interest in expedient corporate management and development.

As part of our business development, we may also sell or acquire businesses, parts of businesses, or companies to or from others, or enter into partnerships, which may also lead to the exchange and processing of data.

Insofar as there is no legal obligation to process this data, we do so in pursuit of our legitimate interests.

When you visit our premises, we will make video recordings in correspondingly designated areas for security and evidence purposes. The recordings are accessible to selected AXA employees within the framework of their responsibilities. We only analyze the recordings if necessary (in cases subject to criminal law) and delete them between 7 and 30 days later.

Data processing is permitted on the basis of our overriding legitimate interest in ensuring the security of our buildings and systems. Where the GDPR is applicable, the legal basis is our legitimate interest (Art. 6 para. 1 (f) GDPR) in ensuring the security of our buildings and systems.

1.3.10. Legal basis pursuant to GDPR

Where the GDPR (General Data Protection Regulation) applies, we proceed in application of the following legal bases:

a) Initiation or performance of a contract
b) Existence of a legal obligation
c) Consent from you or a person authorized by you
d) Our legitimate interests.
These include, for example:

- Efficient and effective protection of customers, employees, and other persons as well as protection of AXA's data, secrets, and assets as well as data, secrets, and assets that have been entrusted to AXA
- Maintenance and secure, efficient, and effective organization of business operations, including secure, efficient, and effective operations and successful development of the website and other IT systems
- Efficient and effective customer support, contact maintenance, and other communications with customers including outside of contract processing
- Corporate governance and development, in particular with regard to the AXA Group
- Documentation of customer behavior, activities, preferences, and needs, implementation of market studies
- Efficient and effective improvement of existing products and services as well as development of new products and services
- Management of advertising and marketing measures
- Sale or purchase of business areas, companies, or parts of companies and other transactions under company law
- Prevention of fraud, misdemeanors, and felonies as well as investigations in connection with such offenses and other inappropriate behavior, dealing with lawsuits and actions against AXA
- Participation in legal proceedings and cooperation with authorities as well as otherwise asserting, exercising, and defending legal entitlements
- Use of new technologies such as artificial intelligence

1.4. Collection of data

1.4.1. Direct data collection

Personal data is primarily collected from you directly (e.g. personal consultation, and through online, application, and claims forms as well as phone recordings after the corresponding recorded message).

1.4.2. Reported data on third parties

If you wish to take out an insurance policy on behalf of another person (e.g. family members) or provide us with personal data on other persons (third parties), we assume that you are authorized to do so and that this data is correct. Please ensure that these persons are aware of our Privacy Policy. Please also ensure that all information provided to us is correct and that you are authorized to provide us with the data or relevant product information.

1.4.3. Indirect data collection

In specific cases, we collect your data from third parties or receive your data from third parties or public offices. For example, we process data that we receive from government agencies or authorities, financing companies, banks or other insurance companies, sales partners, employers, medical service providers, and experts such as lawyers or doctors, or from Car Claims Info, the HIS warning and information system, or within the framework of credit reports in order to have the necessary data for concluding or processing the contract. When you send an insurance application or report a claim or benefit case, you release the corresponding bodies from any duty to protect secrets. In addition, we process data obtained from data suppliers and address brokers or third-party website operators and online networks so that we can provide you with the best possible service and optimal advice as well as ensure data accuracy.

Where permitted, we obtain specific data from publicly accessible sources (e.g. debt collection register, land register, commercial register, media, internet) or receive such data from other companies within the AXA Group, as well as authorities, cooperation partners, and other third parties.

1.5. Profiling, automated individual decision-making, and the use of artificial intelligence

1.5.1. Profiling

We may process and evaluate your data on an automated (i.e. computer-supported) basis for the purposes specified in section 1.3 Purpose of data processing.

"Profiling" involves the automated processing of data in order to analyze or predict – and therefore assess – certain personal characteristics or a person's behavior. This is done by combining, linking, and analyzing the personal data available to us. The result – that is, the profile created – gives us information about personal characteristics such as personal preferences, interests, place of residence, and changes of location. This enables to support and advise you on a more personalized basis and more successfully tailor our offerings to individual customer requirements. This enables us to support and advise you on a more personalized basis and more successfully tailor our offerings to individual customer requirements (see also section 1.3.6).

In addition, we use profiling to identify security risks and any risks of misuse, to conduct statistical analyses, and for operational planning purposes. We may also use these procedures to combat money laundering and misuse, as well as perform credit checks. Finally, these personalized risk assessment and evaluation procedures can be used as an essential calculation basis for the insurance contract.

Profiling is performed within AXA in order to process insurance business or in connection with our associated, overriding legitimate interests. Information on creditworthiness and past payment behavior can also be used for this purpose. We ensure that the results are proportionate and reliable at all times, and take action against any misuse of profiles or profiling.

1.5.2. Automatic case-by-case decision-making

To ensure the efficiency and uniformity of our decision-making processes, we may also take specific decisions on a fully automated basis (computerized basis in accordance with specific rules and without any human involvement/checking by employees). These decisions can also be taken on the basis of profiling.

In the event of such automated case-by-case decision-making, you will be specifically notified of its usage in the individual case should the decision have negative legal consequences for you or cause comparatively significant impairment. In such cases, you can ask for such a decision to be reviewed by an AXA employee (see section 1.8.9 Automated case-by-case decision-making).

1.5.3. Use of artificial intelligence (AI)

For the purposes described in section 1.3, your data may be processed and analyzed using artificial intelligence (AI). The use of AI serves to improve and increase the efficiency of existing business processes, for example in the creation and translation of texts, the summarization of documents or analysis of data, the identification of patterns and trends, or the provision of recommendations.

AI-generated outputs are generally interpreted and reviewed manually by humans. If an AI system we use interacts directly with you, we will inform you of this.

If data processing using AI is based on the GDPR, it is carried out on the basis of our legitimate interest (Art. 6 para. 1 letter f GDPR, see section 1.3.10.).

1.6. Disclosure of data

1.6.1. General principles

We protect your data and do not sell it to third parties.

In some circumstances, your data may be disclosed to data processors and third parties (e.g. if required for contract conclusion or processing, or for other purposes specified in this Privacy Policy). These recipients are contractually required to comply with current data protection laws as well as confidentiality and secrecy requirements, if applicable. In addition, your data may be disclosed to other controllers or cooperation partners.

We reserve the right to disclose information even if it is confidential. In many cases, the disclosure of confidential data is necessary in order to process contracts or provide other benefits. Nondisclosure agreements do not generally exclude such information disclosures – including disclosure to service providers. Given the sensitivity of the data and other factors, however, we always ensure that such third parties deal with the data in an appropriate manner.

1.6.2. Disclosure of data to electronic clearing office

To facilitate automated data exchange between AXA, the federal government, as well as cantonal driver and vehicle licensing offices or shipping authorities, AXA is affiliated with the electronic clearing office (CLS). The latter collates electronic certificates of insurance (data on vehicles and vehicle keepers, as well as ship and shipowner data) for administration and archiving purposes and forwards them to the road traffic licensing information system (IVZ) of the Federal Roads Office (FEDRO) or to the cantonal shipping authorities.

1.6.3. Data disclosure within the AXA Group

We are part of the AXA group of companies and therefore carry out some business processes in centralized service units and data processing systems belonging to the AXA Group. This data processing, which also involves the processing of data outside of the European Economic Area (EEA) and Switzerland, is permitted on the basis of our Binding Corporate Rules (BCR) – available online at AXA.ch/en/information/data-protection.html). Our company policies cover all AXA companies and entities that conduct joint economic activity with AXA companies, including the transfer of data to processors belonging to the AXA Group. Details of individual companies in the AXA Group can be found here: List of AXA companies worldwide – available online at https://www.axa.ch/en/information/data-protection.html.

1.6.4. Disclosure of data to data processors

We work with contractors such as suppliers, IT service providers, and other service providers. These services include, for example, IT services, the sending of information, marketing, sales, and communication services. They are contractually obliged to process the data only for the purposes predetermined by AXA. If the data processors themselves involve third parties, we may approve this.

1.6.5. Disclosure of data to cooperation partners / third parties

We work with third parties that process your data based on their own responsibility, or based on shared responsibility with ourselves. Such third parties include any natural person or legal entity, authority, institution, or other public office that is not part of the AXA Group or its data processors. In particular, we include the following categories and cooperation partners:

- Insurance intermediaries, distributors, and other contracting parties
- Experts such as doctors and attorneys
- Previous insurers, co-insurers, and reinsurers
- Social and health insurance companies as well as other private insurance companies
- Other participants in an incident (e.g. in the event of an insured event)
- Authorities, courts, and public offices
- Auditors
- Other parties in potential or actual legal proceedings
- Repair shops/garages/mechanics/breakdown service providers/transporters/taxi and car rental companies

In addition, we may disclose data to research institutions or researchers for scientific research or statistical purposes. In this case we ensure that the data is disclosed on an anonymized or pseudonymized basis.

1.6.6. Data abroad

In connection with our business activities, data may be disclosed in Switzerland, EU/EFTA/EEA countries and, under certain circumstances, to recipients worldwide, but primarily to countries in which other companies of the AXA Group operate (List of AXA companies worldwide: available online at https://www.axa.ch/en/information/data-protection.html). Prior to transmitting data abroad – including to a country outside of the EU/EFTA/EEA – we ensure that the country has an appropriate degree of data protection. In the event of data transfer to the US, we generally work with certified companies. If the country does not have appropriate data protection (which often applies to countries outside of the EU/EFTA/EEA), we ensure an appropriate degree of protection by means of contractual provisions (e.g. based on standard contractual clauses of the European Commission – a copy of these clauses can be found at https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32021D0914 or in our Binding Corporate Rules [BCR] – available online at https://www.axa.ch/en/information/data-protection.html – along with effective technical security measures. Please note that such contractual safeguards provide

adequate protection; however, not all risks can be entirely ruled out (e.g. risk of government intervention abroad).

1.6.7. Swiss Earthquake Claims Organization (SOE)
The Swiss Earthquake Claims Organization (Schadenorganisation Erdbeben, SOE) actively supports the cantonal building insurers and private insurers with assessing damage to buildings and estimating the cost of reconstruction following an earthquake.

We send the required information on our policyholders' damaged buildings (e.g. information about the owner of the building and administration of the building where available, sum insured, type of building, class and use of building, volume where available) to the SOE for the purpose of enriching the data from the Federal Register of Buildings and Dwellings (RBD) and for estimating the cost of repairing buildings following earthquake damage.

1.7. Duration of storage

1.7.1. Retention period
We process the data collected for as long as necessary and in compliance with the statutory retention period (bookkeeping, limitation period, company law, tax and social insurance legislation), contractual retention periods, the requirements imposed by the authorities, and for performing our specified processing tasks, as well as on the basis of our overriding legitimate interests (e.g. documentation and evidence purposes) (in particular to provide evidence or to defend against claims and to demonstrate good data governance).

The statutory retention period is generally at least 10 years. The statutory limitation period is generally between 5 and 20 years.

Protecting our interests includes enforcing or defending against claims, archiving purposes, and ensuring IT security. Documentation and evidence purposes include our interest in documenting processes, interactions, and other facts in the event of legal claims, discrepancies, IT and infrastructure security purposes, and proof of good corporate governance and compliance. For technical reasons, storage may be necessary if certain data cannot be separated from other data and we therefore have to store it together with this data (e.g. in the case of backups or document management systems).

1.7.2. Purpose-oriented retention period
Within the meaning of a purpose-oriented retention period, we ensure that your data is only stored for as long as is absolutely necessary for the specific processing purpose. Due to actuarial circumstances (occurrence of a claim/suspected misuse/recourse claims/dispute) and changing legal parameters that can simultaneously involve different retention periods, the retention period may range from a few days to a few years or more. Once these purposes have been achieved or no longer apply and there is no longer any obligation to retain the data, we delete or anonymize your data as part of our usual procedures.

Further information can be found under the respective processing tasks in section 1.3. Purpose of data processing or in Part 2 onward (Part 2. Using the website).

1.8. Your rights

1.8.1. General principles
If your data is processed by AXA you may – in accordance with applicable data protection legislation and the processing purpose – assert the rights specified in sections 1.8.2 to 1.8.7 generally free of charge and at any time. Please note that these rights are subject to legal requirements and that exemptions and restrictions apply. Specifically, we may need to process and store your data in order to perform a contract with you, safeguard your legitimate interests (e.g. asserting, exercising, and defending legal entitlements), or to comply with legal obligations. It is therefore possible that we may reject a data subject's request in whole or in part (e.g. by redacting certain content that concerns third parties or trade secrets).

These rights will be asserted pursuant to section 1.8.2 – 1.8.7 by sending an email or letter (postal address) to the unit specified in section 1.9.1.

For the purpose of avoiding misuse, the exercising of your rights generally requires that you prove your identity conclusively (e.g. by means of a copy of your identity card or passport), unless we are unable to identify you clearly in another way.

Data subject requests addressed to the units specified may be processed by other units such as AXA Complaint Management.

If you believe the processing of your personal data violates the data protection legislation or that your rights under the legal provisions are breached in any other way, you have the option of submitting a complaint to the responsible data protection authority (see section 1.9.2 Data protection supervisory authority).

1.8.2. Right to information
You have the right to request information from us as to whether we process your data and, if so, what data.

1.8.3. Right to data portability
You have the right to request the release of specific personal data in a common electronic format or for it to be transferred to another controller.

1.8.4. Right to rectification
You have the right to insist that we rectify any incorrect data or that we supplement any incomplete data if it is incorrect or incomplete. If we have stored incorrect personal data about you, we will be pleased to rectify this based on the information you provide, unless you can correct or supplement it yourself via a portal.

1.8.5. Right to erasure
You have the right to request the erasure or anonymization of data that is not essential to the performance of the contract, or that is not being processed on the basis of legal obligations (e.g. mandatory retention) or on account of AXA's overriding legitimate interests. If erasure is technically impossible or involves disproportionate effort, we will be unable to meet your request for erasure.

1.8.6. Processing restriction
In certain cases you will have the right to the restriction of processing (e.g. if the accuracy of the data is disputed or unlawful processing is asserted).

1.8.7. Right to object
You have the right to object to the future processing of your data with immediate effect, in particular if processing is in order to maintain our legitimate interests, e.g. in the case of direct marketing and for the profiling undertaken for the purpose of direct advertising.

1.8.8. Revoking your consent
Provided the processing of your data is based on consent that you have granted, you have the right to revoke your consent to future processing at any time and with immediate effect. However, this is only possible if the data processing is not required in connection with contractual obligations. You can assert this right at any time as follows:

- General contact / AXA (AXA.ch/en/private-customers/contact-services/contact/general-contact.html)
- AXA 24-hour helpline 0800 809 809

1.8.9. Automated case-by-case decision-making
If we have made an automated case-by-case decision within the meaning of the applicable law, we will inform you of this with the decision. You will then have the right to present your point of view and demand that the decision is reviewed by an employee. When informing you of the decision taken, we will let you know whom to contact. You should then get in touch with the contact person specified in the decision notification.

1.9. Data Protection Consultant / Data Protection Supervisory Authority

1.9.1. Switzerland and the Principality of Liechtenstein
Please send applications and inquiries in connection with the processing of your data by AXA in writing, enclosing a copy of your identity card or passport, to the data protection consultant:

- **AXA data protection consultant for business activity in Switzerland and the Principality of Liechtenstein (excluding occupational benefits insurance)**
  AXA Insurance Ltd
  General-Guisan-Strasse 40
  CH-8400 Winterthur
  E-Mail: datenschutzanliegen@axa.ch (unencrypted)

- **AXA-ARAG data protection consultant for legal protection insurance for business activity in Switzerland and in the Principality of Liechtenstein**
  AXA-ARAG Legal Protection Ltd
  Ernst-Nobs-Platz 7
  P.O. Box 1026
  CH-8021 Zurich
  Email: datenschutzanliegen@axa-arag.ch
  (unencrypted)

1.9.2. Data protection supervisory authority
If you believe AXA has failed to comply with the data protection regulations applicable to you, we would advise you to contact the relevant, above-mentioned AXA Data Protection Consultant in the first instance.
You can, however, also file a complaint directly with the relevant data protection supervisory authority:

- **Switzerland**
  Federal Data Protection and
  Information Commissioner
  Feldeggweg 1
  CH-3003 Bern

- **Principality of Liechtenstein**
  Data Protection Authority (DSS)
  Städtle 38
  Postfach 684
  FL-9490 Vaduz

1.10. Information on data protection for accident insurance (AIA)

1.10.1. Legal basis and principles of data processing
In determining its obligation to provide benefits under the AIA (Federal Act on Accident Insurance), AXA acts in a sovereign capacity as a social insurance provider. The provisions of the AIA and the GPSL (Federal Act on the General Part of the Social Security Law) as well as the relevant ordinances AIO (Ordinance on Accident Insurance) and ATSV (General Aspects of the Social Security Ordinance) apply, which also include provisions on data exchange, coordination, and procedural matters.

With regard to the processing and collection of personal data, the AIA contains specific requirements that generally take precedence over the Data Protection Act (FADP).

In the case of AIA group contracts with policyholders having their registered office or branch in Switzerland, EU Regulation 2016/679 (GDPR) is generally not applicable. The regulation of (mandatory) accident insurance also does not fall within the material scope of application of EU law within the meaning of Art. 2 para. 2 letter a GDPR.

1.10.2. Responsibility for data processing
AXA Insurance Ltd, General-Guisan-Strasse 40, CH-8400 Winterthur, is responsible for data processing under the AIA.

1.10.3. Data categories
The following data and categories of data are processed:

- Customer and contract data
- Payment data
- Claims data, including health and wage data

1.10.4. Purpose of data collection and processing
The aim of data gathering and processing is to ensure that claims are processed correctly. This also includes the prevention and avoidance of accidents and occupational illnesses, as well as the assertion of any right of recourse against a liable third party.

1.10.5. Retention period

The retention period of claims data is at least ten years after the claim has been settled.

1.10.6. Disclosure of data

AXA is authorized to collect, process, and/or have third parties "process" the data specified in section 10.1.3 for the purposes of

- claims and contract settlement,
- the prevention and avoidance of accidents and occupational illnesses, and
- the assertion of the right of recourse against a liable third party

(Art. 96 AIA).

If data is processed by third parties (e.g. in the context of an external expert opinion), AXA remains responsible for compliance with legal requirements and for handling any requests for access to files (Art. 47 GPSL). Within the scope of the duty to cooperate (Art. 28 GPSL) the insured or the person claiming benefits may be required to release their treating medical personnel from their duty of confidentiality vis-à-vis AXA.

Data is also disclosed to third parties (e.g. other involved insurance companies or social insurance and external experts) if AXA was authorized to disclose data or if there is a legal obligation or overriding interest to do so.

The health data gathered about the insured are not disclosed to the policyholder or employer. However, AXA does inform the latter about its decisions and give them the information they need to coordinate their service obligation, assess suitability in the employment relationship or perform the employment contract. To the extent that the employer is a party to the proceedings and is to be granted the corresponding procedural rights and the right to inspect the case file, the insured's overriding private interests must be safeguarded (Art. 47 GPSL).