

## Data Protection Policy Helsana Group

Effective 11 December 2018

### Table of Contents

1. Role of the Helsana Group .....	2
2. Basic Conditions .....	2
3. Helsana's Data Protection Policy: Scope of Applicability .....	2
4. Helsana Group's Data Protection Policy: Principles.....	2
5. Entry into force.....	3

## 1. Role of the Helsana Group

The Helsana Group (hereinafter: Helsana) is a leading Swiss insurance group providing mandatory and voluntary health, daily sickness allowance and accident insurance for private individuals and companies; in addition, as a forward-looking, innovative, professionally managed insurer it plays a key role in improving the healthcare sector.

The data handled by Helsana in the course of its operations as an insurance provider are often highly sensitive – health data in particular. Helsana therefore guarantees high levels of data protection and information security (data security) at all times when processing such data. By upholding individuals' rights to protection of their personal sphere, Helsana guarantees that business relationships are based on trust.

## 2. Basic Conditions

The purpose of data protection is to protect the personal sphere of the individuals regarding whom data are being processed, and to uphold their basic rights. Persons who process personal data must not unlawfully infringe the personal sphere of the individual involved. In addition to specific data protection legislation (Data Protection Act [DSG], Ordinance to the Federal Act on Data Protection [VDSG]), other special regulations in the area of health and accident insurance (e.g. Federal Act on the General Part of Social Insurance Law [ATSG], Federal Health Insurance Act [KVG], Federal Accident Insurance Act [UVG], Federal Act on Insurance Contracts [VVG]) and regulatory requirements (regarding circular letters, bulletins etc.) also apply.

Data security aims to protect information across its entire life cycle. The goal is to ensure confidentiality, integrity, and availability of information security, and also to guarantee transparency and provide an audit trail (record-keeping).

## 3. Helsana's Data Protection Policy: Scope of Applicability

Helsana, its employees, decision-making bodies and agents are obligated to comply strictly with relevant legislation and contractual provisions, and with internal rules regarding data protection and information security. They are also obliged to continually optimise data protection and information security. Helsana's Data Protection Policy also applies to its business associates, for example when joint ventures, agreements and overall processes are set up, provided this does not involve unreasonable incursions upon their areas of responsibility.

## 4. Helsana Group's Data Protection Policy: Principles

The individual insurance providers within the Helsana Group are subject to particularly strict data protection regulations. As a matter of principle, no personal information may be disclosed to third parties outside Helsana. Exceptions only apply in cases where the relevant legislation explicitly stipulates or permits disclosure of data.

- 4.1 Helsana must ensure that the appropriate organisational, HR and technical prerequisites for ensuring legally compliant data protection and information security are fulfilled at all times.
- 4.2 Helsana must guarantee that its customers and insured parties are able to make a broad assessment of data processing relating to them, and are able to see that their statutory rights are being upheld.
- 4.3 Compliance with data protection undergoes ongoing monitoring, and in the event of non-compliance appropriate action will be taken. Data protection compliance is part of Helsana's internal control system [ICS].
- 4.4 The Helsana Group regularly provides its employees and decision-making bodies with appropriate training and consciousness-raising regarding data protection.

- 4.5 All employees are obligated to maintain professional secrecy as defined in Art. 33, Federal Act on the General Part of Social Insurance Law and Art. 35, Data Protection Act. In the event of infringement, they will be subject to the penal provisions in Art. 54, Health Insurance Oversight Act [KVAG] and Art. 35, Data Protection Act. Employees receive information regarding sanctions. In conjunction with their employment contract they are obligated to maintain confidentiality and professional secrecy.
- 4.6 Helsana respects and protects the personal sphere of its employees. It processes data regarding its employees only insofar as it relates to their suitability for employment or in order to implement the employment contract.
- 4.7 Helsana has an in-house data protection officer. He/she provides advice to all employees regarding data protection issues, projects and plans. The data protection officer performs ongoing work aimed at improving and maintaining data protection within Helsana. He/she regularly provides information in a suitable form to Helsana's management and the Board of Directors regarding the status of data protection.
- 4.8 Since Helsana is (partially) subject to the EU GDPR, in the absence of a subsidiary in the European Union, it has appointed an EU representative. Helsana has also appointed an external data protection officer for data processing that falls under the EU GDPR. The tasks and responsibilities of this officer are in line with Art. 38 f. of the EU GDPR.
- 4.9 The persons involved may consult the data protection officer regarding data protection issues and may offer suggestions, make enquiries, seek information or submit complaints. Enquiries and complaints will be kept confidential if desired. The Helsana data protection officer can be reached at the following address:

Helsana Insurance Company Ltd  
Data Protection Officer  
PO Box  
8081 Zürich

## 5. Entry into force

This Data Protection Policy replaces the version dated 12 December 2017 and enters into force on 11 December 2018.

Dübendorf, 11 December 2018

Helsana Group

Prof. MD Thomas D. Szucs  
Chairman of the Board of Directors

Daniel H. Schmutz  
CEO

Publication: [www.helsana.ch](http://www.helsana.ch)  
Intranet, Company Standards and Guidelines [USR]