

## Privacy Policy for Helsana websites

Version 1.1 dated 18 October 2018

In this Privacy Policy we explain the principles governing how the Helsana Group (including Helsana Supplementary Insurances Ltd, Helsana Insurance Company Ltd, Progrès Insurance Company Ltd, Helsana Accidents Ltd, hereinafter collectively referred to as **Helsana, we or us**) collects and processes personal data through this website and other websites operated by Helsana (hereinafter referred to as **website**). Personal data refers to any information that personally identifies you or makes your identification possible.

If you wish to find out more about how data are processed when you use our website, please read our [detailed Privacy Policy](#).

### 1. Data controller

Helsana Ltd is responsible for all data processing performed within the scope of this Privacy Policy. Helsana's data protection officer can be contacted at:

Helsana Ltd  
Data Protection Officer  
Zürichstrasse 130  
CH-8600 Dübendorf.

To the extent that Helsana falls within the scope of the GDPR, Active-Assets A<sup>2</sup> GmbH serves both as its data protection officer within the meaning of Art. 37 GDPR and its representative pursuant to Art. 27 GDPR. The contact details are:

Active-Assets A<sup>2</sup> GmbH  
Gottlieb-Daimler-Str. 5  
78467 Constance  
Germany  
privacy@helsana.ch

### 2. Type of data collected

When you visit our website, for technical reasons your Internet browser automatically sends us certain data regarding your usage (specifically the date and time you visited the website, the IP address of your computer or mobile device, etc.) which are stored in log files. You can only use our website if you provide us with this data.

Furthermore, certain uses of our website require that you voluntarily provide us with additional personal data, such as your name, date of birth, place of residence and (e-mail) address. If you do not wish to provide us with this personal data, you may not be able to use certain offers on the website or only do so to a limited extent.

If you visit our websites or interact with certain services, we or our authorised service providers may use cookies and other similar technologies.

Read our [detailed Privacy Policy](#) and [Cookie Policy](#) for in-depth information about the personal data collected through the website as well as our use of cookies and other technologies.

### **3. Purpose of data processing and legal basis**

We use the personal data collected through the website in particular for the purpose of providing and further developing both the website and the services offered on it. Furthermore, you enable us to offer you a personalised user experience on our websites, to contact you in connection with our services and to provide you with the full range of customer services and to comply with our legal and regulatory requirements.

If you are already a customer of Helsana or wish to become one, we may link the personal data collected via the website and provided by you to existing personal data. In this case, the legal basis for processing your personal data is in order to fulfil contractual commitments. Other legal bases for processing your personal data include your consent, which you may withdraw at any time, and the legitimate interests of Helsana.

If you wish to find out more about the purpose of data processing and the legal bases for such processing, please read our [detailed Privacy Policy](#).

### **4. Transfer of data and disclosure of data abroad**

Regardless of how we collect your personal data in connection with the website, all Helsana Group companies have access to the personal data. This means that your personal data can also be processed for various purposes and linked together with personal data that is collected by another company of the Helsana Group.

Furthermore and to the extent permitted by applicable (data protection) law, Helsana may also transfer personal data to contracted service providers or, where necessary, other third parties such as authorities or courts (both inside and outside Switzerland). The service providers consulted in connection with data collected on the Website specifically consist of IT service providers working in the area of data storage and data analysis (for details on third-party providers, please refer to our [detailed Privacy Policy](#) and [Cookie Policy](#)).

### **5. Data protection and retention period**

We take appropriate technical and organisational measures to protect your personal data collected via websites against unauthorised processing, loss and destruction. We are also concerned about the confidentiality, availability and integrity of your personal data.

We will retain your personal data for as long as necessary to provide the services available on the website or for other processing purposes. If we have a legal obligation to retain your personal data, we will delete it after expiry of the respective retention period.

## **6. Users' rights**

Where data processing is done based on your consent, you have the right to withdraw this consent at any time. Withdrawal of consent shall only apply to future data processing. This shall not affect processing that took place before the withdrawal.

You have a right of access to your personal data. You also have the right to request that we rectify, delete or restrict the processing of your personal data and to object to such processing of your personal data. Where applicable, you also have a right to data portability.

In addition, you can assert your rights in court and have the right to file a complaint with the competent data protection authority. If the data controller is in Switzerland, this is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

Our [detailed Privacy Policy](#) informs you in greater detail about your rights and our Cookie Policy tells you all you need to know about data collected through the use of cookies by third parties as well as any restrictions.

## **7. Changes to the Privacy Policy**

Helsana may modify this Privacy Policy at any time without advance notice and without notification. The version currently published on the website shall apply.

## Detailed Privacy Policy for Helsana websites

### 1. Scope

This Privacy Policy explains the acquisition and further processing of personal data collected via Helsana's website. This Privacy Policy does not conclusively govern all aspects of data processing performed by Helsana. Data processing may be covered by other privacy policies or data protection statements and processing regulations, or may arise through specific circumstances or be governed by law.

### 2. Data controller | Data protection officer

Helsana Ltd is responsible for all data processing performed within the scope of this Privacy Policy. Helsana's data protection officer can be contacted at:

Helsana Ltd  
Data Protection Officer  
Zürichstrasse 130  
CH-8600 Dübendorf

To the extent that Helsana falls within the scope of the GDPR, Active-Assets A<sup>2</sup> GmbH serves both as its data protection officer within the meaning of Art. 37 GDPR and its representative pursuant to Art. 27 GDPR. The contact details are:

Active-Assets A<sup>2</sup> GmbH  
Gottlieb-Daimler-Str. 5  
78467 Constance  
Germany  
privacy@helsana.ch

### 3. Collection and processing of personal data when using the website

#### 3.1 Type of data collection

When you visit our website, your Internet browser sends us certain data regarding your usage and stores this in log files. This concerns the following data in particular: date and time when the Website was accessed, name of the website accessed, IP address of your computer or mobile device, address of the referring website, transferred data volume as well as the name and version of the Internet browser used.

These data form the basis for statistical, anonymous evaluations, help to optimise and continuously further develop the websites and can also be evaluated for marketing purposes. If you wish to prevent this, you can change your settings in the cookie preference centre ([Cookie Policy](#)) at any time.

As described below, certain uses of the website also require Helsana to collect personal data. When using the website, you either provide these manually (see Section 4 below) or their provision is dependent on your Internet browser's technical settings and these are either automatically collected or made available by third parties in accordance with those settings (see Section 5). If you do not wish to provide us with this personal data, you may not be able to take advantage of certain offers on the website (such as the premium calculator) or their functionality may be impaired.

### 3.2 Personal data collected in connection with the use of the website

In connection with the use of the website, Helsana collects the following categories of personal data in particular:

- **Data provided manually:** this includes, but is not limited to, first name, surname, gender, date of birth, age, marital status, (e-mail) address, insurance number, telephone number, family members, preferred communication channel, personal data contained in uploaded files, etc.
- **Personal data collected automatically:** this includes cookies, date, time and number of visits to the website, pages and content accessed, referring websites, downloaded files, etc.

### 3.3 Use of personal data collected on the website and legal basis

If you are already a customer of Helsana or wish to become one, we collect and process personal data during the conclusion and execution of contracts with our customers. We may link the personal data you provide via the website to other existing personal data. Data are processed for purposes that are primarily geared toward specific products (e.g. basic insurance, BeneFit PLUS, SANA, COMPLETA, PRIMEO), and may include requirements analyses and insurance consultations. For information regarding further purposes of data processing conducted as part of the contractual relationship, please refer to the corresponding [privacy policies](#).

Other than for the fulfilment of the contract or outside an existing contractual relationship, we use data collected via the website to protect our legitimate interests or those of third parties. Examples:

- to provide and develop the website and improve and ensure the website's customer friendliness;
- to perform statistical analyses of website use;
- to examine and optimise requirements analysis methods for the purpose of approaching customers directly;
- to advertise and market our products and services;

- to conduct market research, customer satisfaction and opinion surveys, as long as you have not objected to the use of your data;
- to enforce legal claims and as defence in legal disputes;
- to safeguard the IT security and IT operations of the insurance company;
- to prevent and investigate criminal offences;
- to adopt measures for the further development of services and products, also in connection with corporate transactions where appropriate.

We may also use the data to comply with our legal and regulatory obligations.

If, in individual cases, you have consented to the processing of your personal data for a specific purpose, we will base the processing on this consent. You may withdraw your consent at any time, whereby such withdrawal only applies to the future and does not affect the legality of data processing already carried out. Data processing carried out on the basis of on your consent includes, in particular, delivery of the newsletter or submission of a contract offer based on the information you entered into the premium calculator.

## **4. Personal data provided manually by the user**

### **4.1 Newsletter**

On this website you can subscribe to our newsletter by providing us with personal data (first name, surname and e-mail address). For verification purposes, we will send you a confirmation e-mail immediately after completion of the registration process. The personal data collected during your registration will be used for sending our newsletter. This personal data may be passed on to our marketing department, which processes the data only on our behalf. To the extent permitted by applicable data protection law, we may include codes in our newsletters with which we can recognise whether the recipient has opened the e-mail and downloaded the images contained therein. The recipient can block this in his/her e-mail programme.

You can unsubscribe from our newsletter at any time by clicking [HERE](#) or on the link at the end of each newsletter.

### **4.2 E-mail**

Normal e-mails that you send to Helsana are not encrypted and may potentially be viewed by third parties. Since we are unable to safeguard the data security of unencrypted e-mail traffic sent to Helsana, Helsana excludes any warranty and liability for such traffic. For this reason, we recommend that you get in touch with us directly by using the available contact forms ([Contact forms](#)).

#### **4.3 Contact forms**

Confidential, personal data that you send to Helsana using the forms provided on the websites are transmitted in encrypted form according to the current state of the art and cannot be viewed by third parties. The data you enter via the website will be used in particular to process contracts, process your requests and, if necessary, for marketing purposes within the Helsana Group.

By entering your data in the premium calculator, you agree in particular to be contacted by the companies of the Helsana Group by telephone or another channel for the purpose of making you an offer.

#### **5. Personal user data collected automatically**

For further information on our use of cookies and other technologies, please read our [Cookie Policy](#).

#### **6. Data security**

We take appropriate technical and organisational measures to protect your personal data collected via websites against unauthorised processing, loss and destruction. We are also concerned about the confidentiality, availability and integrity of your personal data.

#### **7. Data retention**

We will retain your personal data for as long as necessary to provide the services available on the website or for other processing purposes, such as fulfilling legal obligations, resolving disputes and enforcing our policies. If we have a legal obligation to retain your personal data, we will delete it after expiry of the respective retention period.

#### **8. Disclosure of data and transfer of personal data abroad**

Regardless of how we collect your personal data in connection with the website, all Helsana Group companies have access to the personal data. This means that your personal data can also be processed for various purposes and linked together with personal data that is collected by another company of the Helsana Group.

Furthermore and to the extent permitted by applicable (data protection) law, Helsana may also disclose personal data to contracted service providers (both inside and outside Switzerland). In connection with data collected on the website, these specifically consist of IT service providers working in the area of data storage and data analysis.

Personal data obtained in connection with the use of the website may also be disclosed to third parties (inside or outside Switzerland) if we are obliged to do so by law, by court order or by

official order or if this is necessary to support internal or external investigations, other legal investigations or proceedings in Switzerland or abroad or any corporate transactions.

The service providers and third parties to whom Helsana transmits data may be located in any country in the world (specifically the US and Ireland). If data is transferred to a country without adequate data protection, Helsana guarantees adequate protection through the use of sufficient contractual guarantees, specifically on the basis of EU standard contractual clauses, binding corporate rules or based on exceptions with respect to consent, contract execution, the determination, exercise or enforcement of legal claims, overriding public interest, the data published by you or because it is necessary to protect your individual integrity. You may request a copy of the contractual guarantees by sending a written request along with a copy of an official form of identification to the contact address specified above (see Section 2) or this contact will inform you where you can obtain such a copy. Helsana reserves the right to black out such copies for reasons of data protection or secrecy or to deliver only excerpts.

## **9. Profiling and automated individual decision-making**

We or service providers acting on our behalf do not process data with the aim of evaluating specific personal characteristics (profiling).

As a matter of principle, we do not use fully automated decision-making pursuant to Art. 22 GDPR to establish and engage in the business relationship. Should we use these methods in individual cases, we will inform you separately if this is required by law.

## **10. Obligation to provide data**

Access to the website and the related collection of connection data (such as IP addresses) must be logged; this happens automatically during use and cannot be disabled for individual users. With the exception of the data required for technical reasons (see Section 3.1 above), you are not obliged to provide us with any personal data in connection with your use of the website. However, certain services cannot be used without the provision of personal data, or their functionality is impaired.

## **11. Users' rights**

Within the scope of the data protection law applicable to you, you have the right to access your data, to have it rectified or deleted, the right to restrict data processing and otherwise to object to our data processing and to the disclosure of certain personal data for the purpose of transferring such personal data to another location (so-called data portability). If the processing of personal data is based on your consent, you may withdraw this consent at any time. Exercising these rights usually requires that you can clearly prove your identity. Please note, however, that we reserve the right to enforce the statutory restrictions, for example if we are obliged to retain or process certain data, have an overriding interest in it (insofar as we may invoke it) or need it for enforcing claims.



If Helsana automatically takes a decision concerning an individual person, which has a legal impact or significantly affects the person concerned in a similar way, the person concerned may speak to a competent person at Helsana and request a reconsideration of the decision, or demand from the very start that this be assessed by a competent person, to the extent provided for by law. In this case, the person concerned might no longer be able to use certain automated services. The person will be informed of such decisions subsequently or separately in advance.

Every person concerned has the right to file a complaint with the competent data protection authority. In Switzerland, this is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

You can also prevent or restrict the installation of cookies by changing your browser settings accordingly. However, we would like to point out that, in this case, you may not be able to use all the functions of this website to their full extent.

Furthermore, the automated data processing carried out on this website can be technically prevented as follows:

- Google Analytics: install the browser add-on by clicking the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.
- If you do not want the provider of social media plug-ins to collect data on you via our website, you have to log out of your account on the provider's website before visiting our website. Even if you have logged out of your account, providers still collect data in anonymised form via the social plug-ins and place a cookie on your computer. If you log in to your account on the provider's website at a later date, this data can be linked to your profile.

## 12. Changes to the Privacy Policy

Helsana may modify this Privacy Policy at any time without advance notice and without notification. The version currently published on the Website shall apply.

\* \* \* \* \*