

# DKV Hälsa privacy policy

DKV Hälsa is committed to protecting your privacy. The trust of our customers is our greatest asset, so we attach great importance to protecting your privacy. All of your personal data must be safe with us. This privacy policy explains and clarifies how we as a data controller process the personal data of our customers and visitors.

DKV Hälsa refers to ERGO Forsikring AS Norway Branch, C.I.N. 516402-6998, registered in the branch register Filialregistret. Here you can read about what personal data is processed and about how we collect and use your personal data. You will also find information regarding your rights.

## Who is the data controller?

The data controller is the person who determines the purpose and means of the personal data processing. It is the CEO of DKV Hälsa who is responsible for the processing of personal data by DKV Hälsa.

## How does DKV Hälsa process your personal data?

DKV Hälsa processes your personal data in order to provide you with the products and services that we offer in the best possible way. Your personal data is used for the following purposes:

- Entering into, managing and fulfilling contractual obligations
- Development of new and existing services
- Marketing
- Statistics, analysis and business development
- Compliance with DKV Hälsa's legal obligations
- Preventing and investigating punishable offences against the company
- IT security and physical security
- Complaint proceedings, recourse claims and legal processes

An overview is provided below.

### Entering into, managing and fulfilling contractual obligations

We collect, verify and process personal data in order to offer you the services you wish to use in the app. When you use the app, we process your personal data in order to document, manage and complete tasks, and thereby deliver the agreed services.

The legal basis for this processing is the agreement we have entered into with you and our legitimate interests in managing your customer relationship. If it is necessary to process special categories of personal data, we will ask for your consent.

### Development of new and existing services

We process personal data in order to identify demand for new products and services and also to improve existing products and services. For example, we may wish to use the personal data to improve our customer service, offer new packaged solutions, analyse promotions or customise our website and app according to your wishes and those of other customers. We always seek to anonymise or pseudonymise your personal data when fulfilling this purpose.

The legal basis for this is our legitimate interests in developing the company's products and services.

## **Marketing**

We use your personal data in order to market, categorise and conduct product and customer analyses. We do this in order to offer you relevant and customised services and offers. We use personal data to provide you with information and advice and to market our products and services. We use profiling and segmentation, so that our information is relevant for you.

The legal basis for this is our legitimate interests. If you have an existing customer relationship, we process your personal data based on our legitimate interest in providing you with information and offers.

If you do not have an existing customer relationship, we ask for your consent to electronic or other marketing.

## **Statistics, analysis, modelling and risk assessment**

We analyse and use personal data to perform analyses and produce statistics that are used, among other things, to assess risk, set the right prices and tariffs and decide on the need to develop new or existing products and services.

The legal basis for this may be both legal obligations based on business legislation and DKV Hälsa's legitimate interests in using personal data to gain insight which is necessary to run the business in order to improve, replace or develop new products, services or offers.

## **Compliance with DKV Hälsa's legal obligations**

We process your personal data in order to comply with our obligations under law, other regulations or decisions of the authorities.

The legal basis for this is compliance with the legal obligations that we have under law, other regulations and decisions of the authorities.

## **Preventing and investigating punishable offences against the company**

We process personal data where this is necessary to prevent, detect and investigate fraud and other punishable offences against DKV Hälsa, such as in order to prevent misuse of a product or service or to prevent, impede and investigate criminal activity. The main areas covered by this, in addition to fraud, are money laundering, terrorist financing and international tax reporting.

The legal basis for this can be both compliance with legal obligations and DKV Hälsa's legitimate interests in preventing, detecting and investigating fraud and other punishable actions against the company.

## **IT security and physical security**

It is necessary for DKV Hälsa to use your personal data to ensure IT security and physical security, in order to safeguard your interests and ours. We do this, for example, through access management, log-ins for servers and systems and the operation of the IT infrastructure and through surveillance cameras at our premises.

The legal basis for this may be contractual obligations, compliance with legal obligations and DKV Hälsa's legitimate interests in being able to monitor who is on the premises and to maintain a reasonable level of security.

## **Complaint proceedings, recourse claims and legal processes**

We process personal data in order to establish, assert and exercise legal claims, for example to deal with complaints and recourse claims and in connection with a legal process.

The legal basis for this is our legitimate interests in establishing, asserting and exercising legal claims. To fulfil this purpose, we may also process special categories of personal data without consent.

## **Consent to the processing of health data, sharing of personal data within the Group and electronic marketing**

Sometimes we ask for your consent, among other things in order to:

- process special categories of personal data, such as health data
- share several details about your customer relationship between the companies in Storebrand
- send you electronic marketing about products and services you don't already have

## **Depending on which services you use, we collect different categories of data**

We have grouped the personal data we process into the following categories:

- **Identity data**, such as personal ID numbers, other identification numbers issued by a public authority and copies of documents.
- **Contact details and other general information**, such as names, telephone numbers, e-mail addresses, postal address, family status, date of birth, educational background, etc.
- **Financial information and information about the insurance object** such as the type of agreement, income information, card number, transaction data, credit history, assets, insurance history, etc.
- **Information collected through the use of the DKV Hälsa app**, such as technical information about your telephone and internet connection, as well as which services you have used in the app.
- **Special categories of data**, such as health data and information about trade union membership.

DKV Hälsa usually collects the data directly from you. Sometimes we receive data from other sources, such as your employer, public information registers and business partners.

We will inform you when we collect data, unless this is the result of a legal requirement or if communication is impossible or disproportionately difficult or if we know that you are already aware that we are collecting this data.

## **Duty of confidentiality**

All employees of DKV Hälsa have a duty of confidentiality regarding the information we receive in connection with your customer relationship.

## **Sharing of personal data and use of data processors**

DKV Hälsa is a company within the Storebrand Group. Companies within the Storebrand Group share a central customer register that contains the following information:

- your contact details
- your personal ID number
- what products you have
- which companies within the Group you are a customer of

The purpose of this customer register is to provide our customers with the best possible service and with information and offers relating to the products and services we offer. Your consent is required for the registration of other personal data in the Group's shared customer register and for the disclosure of this data to the various parts of the Group.

DKV Hälsa may also be required to disclose information at the request of public authorities or to other parties on the basis of legal requirements, other regulations and decisions of the authorities and also within the context of court proceedings or similar. We also register claims in the insurance industry's common claims filing register (GSR) in order to prevent compensation being paid on the basis of inaccurate information. In order to deliver our products and services, we may also share your personal data with the following, for example:

- insurance intermediaries
- employers

- other insurance companies (such as reinsurance companies, other insurers and companies that provide pooling solutions)
- auditors

Where the law allows, and where confidentiality does not preclude, the personal data may also be disclosed to other financial companies and business partners for the purposes specified for the processing. Personal data may also be disclosed in connection with payment transactions, where this is necessary in order to carry out the transaction in a secure manner.

If your health insurance is paid for by your employer, DKV Hälsa informs your employer about the price and your agreement number and provides general information about the agreement. We do not disclose any personal data or health-related information to your employer.

DKV Hälsa makes use of suppliers who process personal data on our behalf, including for the provision of IT services. Separate data processing agreements govern how personal data is processed. The suppliers cannot use the data for purposes other than that for which it was obtained. Some suppliers have operations in countries outside the EU, such as India or the USA. We will then enter into the EU's standard agreement (EU Model Clauses) with the supplier in order to safeguard your privacy and your rights.

In order to access some of the services that the DKV Hälsa app offers, you can choose to connect to other apps or websites where responsibility for personal data is governed by a separate third-party privacy policy. Examples of these include health apps from healthcare providers and training apps for training services. We would like to make clear that these apps or websites have their own terms and conditions relating to responsibility for personal data and that you will need to accept a separate third-party privacy policy in order to have access to these services. This privacy policy for the DKV Hälsa app therefore does not apply to third-party services (apps or websites) where you have accepted a separate third-party privacy policy.

## What rights do you have?

### Access

You have the right to obtain details of which personal data we process and how we process it. This means you have the right to request an extract from our records detailing our use of your personal data. If you have any questions about how we process personal data, you can contact us at [dataskyddsbud@dkvhalsa.se](mailto:dataskyddsbud@dkvhalsa.se). We will respond to you as quickly as possible and no later than within 30 days.

### Rectification

It is important that the data we store about you is accurate and necessary. You can require us to rectify or erase data relating to you if it is inaccurate or unnecessary.

### Erasure

We store your data as long as you are a customer of ours. The data is erased when we no longer have obligations under the agreement you have entered into with us or under any other regulation.

We anonymise data used for statistics and analysis when this is possible. If the statistics or the analysis cannot be implemented using anonymised data, we carry out different measures to mask the data we use in order to protect your privacy.

### Objection, your right to object to use

For certain purposes, DKV Hälsa processes personal data on the legal basis of legitimate interests, where our interests are balanced against your interests as a customer. This applies, among other things, to use for developing new products and services, testing IT systems and marketing.

If there are special circumstances which mean that DKV Hälsa should not process your personal data for such purposes, you can tell us about them. In such cases, we perform a specific balancing of interests. DKV Hälsa may continue the processing where this is necessary in order to establish, assert or defend a legal claim.

## Restriction of processing

You can require DKV Hälsa to restrict the processing of your personal data in specific situations. This means that we will still have the data in question stored, but that we temporarily restrict the use of your personal data.

You have the right to request a restriction where:

- you believe that your personal data is inaccurate
- DKV Hälsa no longer needs the personal data for our purposes but you need it because of a legal claim
- you have objected to processing and it is based on a balance of interests

DKV Hälsa can continue processing:

- where this is necessary in order to establish, assert or defend a legal claim
- to protect the rights of others
- in important public interests

## Data portability – take your personal data with you

If our right to process your personal data is based either on your consent or on the performance of a contract with you, you have the right to request to have the data relating to you transferred. We can transfer your information to a company you specify if the information security is satisfactory and it is technically possible.

## Automated processing

At DKV Hälsa we digitise and automate our processes in order to provide more efficient services for you. In some cases, we use automated decisions in order to enter into or implement an agreement with you, such as when you purchase products at [www.dkvhalsa.se](http://www.dkvhalsa.se).

If an automated process has a significant impact on you, you can ask to have the automated decision reviewed by a case officer.

## Personal data collected and cookies

DKV Hälsa uses cookies on our website and in our app, as well as in our services, in order to improve your experience with us. We use cookies to simplify and customise our web services, among other things. Cookies enable us to recognise your browser or mobile phone and can store information about how you use a website or app. You will find information about how to delete or clear cookies at the [Swedish Post and Telecom Authority \(Post- och telestyrelsen\)](http://www.postochtelestyrelsen.se).

We use cookies and the analysis tool Google Analytics in the app in order to:

- be able to deliver the necessary functionality in the app
- learn from your usage so we can improve the functionality, user experience and content of the app
- customise the content so that it is as relevant as possible for you

## Card payments

We ask you to provide your card details so that our payment service provider is able to process payment for products and services. This data is stored solely at the provider and is therefore subject to the provider's privacy policy. We store payment data only to the extent necessary to ensure effective handling of any problems with the charge, adjustment of reserved amounts and crediting.

## Customer surveys

After you have been in contact with us, we will ask you what your experience was like. This helps us to learn more about how we can offer our customers even better products and services. Using this feedback, we can also measure the impact of improvement measures and examine the link between customer satisfaction and customer behaviour over time.

If you do not wish to share this kind of information with us, please do not respond to the survey we send you.

We use Questback as our data processor for customer and market research.

### **We protect your personal data**

We have established procedures and measures at various levels to ensure that there is no unauthorised access to your personal data. Among other things, these measures include regular risk assessments and reviews of technical systems and physical procedures to protect information security.

### **Contact us**

DKV Hälsa's data protection officer will be able to assist you as a customer. If you have any questions about how we process your personal data, or if you want to complain about our processing of your data, you can contact the data protection officer at [dataskyddsbud@dkvhalsa.se](mailto:dataskyddsbud@dkvhalsa.se).

If you have any other questions about DKV Hälsa's healthcare insurance, please contact us by telephone on 08-619 62 00 and select option 1, or by e-mail at [admin@dkvhalsa.se](mailto:admin@dkvhalsa.se).

You can read more about our privacy policy at [www.dkvhalsa.se](http://www.dkvhalsa.se).

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