

DKV Hälsa- Personal Data Controller In Capacity As Insurer

Insurance Customers

DKV Hälsa (DKV Hälsa refers to Storebrand Helseforsikring AS Norway Branch) is, **in its capacity as filial to an insurer, a data controller** in relation to the processing of personal data relating to employees (insured) and employer contact persons (policyholders). As a result of conducting licensed activities, DKV Hälsa is considered to be the party that determines the purposes and means of the processing of personal data, which is the criterion for being a personal data controller. DKV Hälsa is therefore taking responsibility for complying with the requirements for data controllers contained in the new data protection regulation ("GDPR") in respect of, among other things, compliance with the basic principles and ensuring that there is a legal basis for all processing of personal data that takes place.

You are, in your capacity as an employer, responsible for the processing of your employees' personal data in the context of their employment. Since DKV Hälsa is the controller of personal data in relation to your employees processed by DKV Hälsa in its capacity as insurer, no personal data processing agreement shall be established. A personal data processing agreement should only be established in the event that one of the parties is a personal data processor and is acting solely on the instructions of the other party in relation to the processing of personal data. Since both parties are personal data controllers for the processing of personal data carried out by each party, there is no processing situation. Even though no processing situation exists, we need to jointly review and document how we technically transfer personal data between each other in a secure manner to ensure data security, such as confidentiality, accuracy and availability, is maintained.

In order for you, as the controller of your employees' personal data, to be sure that the personal data is being processed lawfully when you send them to us, we have briefly described below how we process personal data.

DKV Hälsa primarily processes personal data for the administration of insurance policies, e.g. when carrying out risk assessments, regulating injuries and paying out compensation to insured persons, as well as for analytical and statistical purposes. Processing of personal data in order to comply with legal requirements also takes place, e.g. reporting to the Swedish Tax Agency and money laundering controls.

In the context of the personal data processing carried out by DKV Hälsa, personal data is handled by the personal data processor with whom DKV Hälsa has entered into the necessary personal data processor agreement. DKV Hälsa stores all data in the EEA. DKV Hälsa discloses personal data to third parties as required by law to, for example, the Swedish Tax Agency and the Swedish Social Insurance Agency, and with the support of a mandate to insurance intermediaries and other representatives of the individual. Certain other disclosures are also made. All disclosures made to third

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parties are assessed by DKV Hälsa and rely on a legal basis in accordance with the requirements of the GDPR.

DKV Hälsa has, in accordance with the requirements of the GDPR, taken the technical and organisational security measures considered appropriate to ensure the security and confidentiality of the data. DKV Hälsa's framework for information security is based on the ISO 27000 series and the security measures taken are in accordance with the legislative requirements.

DKV Hälsa has also appointed a data protection officer whose task is to ensure that personal data are handled in accordance with the GDPR.

In conclusion, note that DKV Hälsa holds a concession for its insurance business and is subject to the supervision of the Financial Supervisory Authority (Sweden) in Sweden. As a result of this, DKV Hälsa is also obliged to fulfil certain specific requirements relating to outsourcing, crisis management, risk analyses and ensuring a high level of security of data and information.

Kind regards,

A handwritten signature in black ink that reads 'Bjarke Thorøe'.

Bjarke Thorøe

CEO

DKV Hälsa/ Storebrand Helseforsikring AS