

Privacy notice of non-life insurance and claims data file

This privacy notice describes what data are saved in LocalTapiola Group's non-life insurance and claims data file, the purposes for which the data are used, how the data are protected, and where the data subjects can get more information with regard to their personal data.

1. Controller

LocalTapiola Group
Revontulenkujä 1
02010 LÄHITAPIOLA

The controllers are the following companies part of LocalTapiola Group:

1. LocalTapiola General Mutual Insurance Company
2. LocalTapiola regional companies (19 companies)*

For more information on LocalTapiola Group, visit LocalTapiola's website www.lahitapiola.fi.

2. Data Protection Officer's contact details

For more information on personal data and the processing of personal data, contact LocalTapiola Group's Data Protection Officer. In addition, LocalTapiola's website www.lahitapiola.fi provides information on the principles governing the processing of personal data at LocalTapiola Group as a whole.

By email: tietosuoja@lahitapiola.fi

By mail: LocalTapiola Group
Legal & Compliance / Data Protection Officer
Revontulenkujä 1
02010 LÄHITAPIOLA

3. Purposes of and legal grounds for the processing of personal data

Data subjects' personal data are processed in accordance with the EU's General Data Protection Regulation (hereinafter 'the Data Protection Regulation'), Finnish data protection legislation, insurance legislation and all other applicable provisions.

Purposes of the processing

Personal data are used for claims handling on the basis of LocalTapiola Group's non-life insurance business and non-life insurance contracts. The data are needed for the management of insurances and claims, for customer service and customer communications, and to fulfil the necessary regulatory requirements. Additionally, the data are also used for the marketing, use monitoring and analysis of, and to compile statistics on the use of, LocalTapiola Group's services and products, as well as for the development of products and services, for ensuring the security of the services, and for the investigation of abuses.

Automated decision-making, and profiling

The processing of personal data may involve automated decision-making. Automated decision-making is employed, for example, when purchasing insurance policies online as well as in the examination of claims, where one of its purposes is to promote the provision of services. Users are specifically made aware of automated decision-making in the context of every service that utilises it, and consent to utilise it is requested where necessary. The data subjects enjoy the right to appeal any decision made on an automated basis and to request that an employee re-process the matter.

The processing of personal data may also involve profiling. Profiling is employed in tasks such as claims handling, to create a risk assessment, and in the targeting of marketing efforts in order for the products and services marketed to meet customers' needs.

For general information on automated decision-making and profiling, visit LocalTapiola's website www.lahitapiola.fi/henkilotietojenkasittely.

Customer due diligence, and prevention of money laundering and countering of terrorist financing

The customer due diligence data and the data subjects' other personal data may be used to prevent, counter, expose and investigate money laundering and terrorist financing, and to initiate

investigations of money laundering and terrorist financing and of criminal offences committed to obtain any property or proceeds of crime that are subject to money laundering or terrorist financing.

A data subject's personal data may be used to investigate whether any of the international sanctions with which the controller complies apply to the data subject.

Legal grounds for the processing

In the main, LocalTapiola processes the data subjects' personal data on the basis of the relevant contractual relationship and the measures that precede the conclusion of a contract.

Personal data may also be processed on the basis of:

- a data subject's consent, such as consent to obtain records of treatment from a hospital or a clinic, or consent to execute electronic direct marketing;
- the controller's statutory obligations, such as the obligations laid down in tax legislation and in the Insurance Companies Act;
- the controller's legitimate interests, such as use of data for direct marketing, provided that the data subject is aware of this and has not prohibited this, and to combat abuse and fraud committed against insurers. Usually, the controller's legitimate interest is founded on a customer relationship between the controller and a data subject, or a comparable relationship, such as the payment of compensation to a victim who is external to the customer relationship.

The processing of a data subject's health information is based on the law or the data subject's consent.

4. Registered groups of persons

The insurance customers and claims customers, including:

- policyholders
- insureds
- other parties relating to insurances and the insurance process, such as beneficiaries, managers and payers
- other parties relating to claims and the claim process, such as injured parties, and bodies liable to repay compensation.

5. Personal data stored in the data file

The insurance data, including:

- The basic insurance contract data, including:
 - offer
 - contract number

- data subjects' personal data
- type of insurance (for example, home insurance, statutory workers' compensation insurance)
- contract start and end dates, and reason for termination
- insurance history data
- reinsurance data
- other data and documentation provided by customers concerning the insurance needs mapping or the contractual relationship, such as health declarations, professional data, and data on hobbies
- policy documents and other insurance contract documents
- The content of insurance, including
 - data on the insured and the subject matter insured
 - insurance cover
 - terms and conditions, and exclusions
 - beneficiary data
- Data on the premiums, including:
 - premium period
 - premiums, mode of premium payment, and debt collection data
 - data on returned premiums, such as the payee's name and account number
 - discounts/increases/bonus data.

The claim-related data, including:

- The data on the insured event customer (for more detailed information, see the customer data file privacy notice), including the data used to withhold tax
- The data on incidents/loss events, such as
 - data submitted by customers on incidents/loss events
 - data on the injured person or the subject matter or property damaged
 - data submitted by third parties needed to examine loss events, such as data provided on incidents by the police or doctors
 - insured event number and the date on which the claim was opened
 - period of incapacity for work, and disability category
- The claim settlement data, including:
 - data on claim acceptance or denial
 - date on which the claim was decided
 - duration of compensation
 - data on preliminary ruling and denial
- The materials required to prepare a claim settlement decision, including:
 - accident-occupational disease notification

- insurance certificate
- claim applications, loss reports and supporting documents
- health-related medical statements
- official documents from authorities, such as police pre-trial investigation files and rulings by the courts
- invoices relating to claims
- examination and treatment orders
- tax calculations and payslips
- decisions
- expenditure records
- damage inspection data concerning the damaged subject matter or property
- vehicle-register data
- specialist statements, such as technical statements
- assessments by specialists, such as doctor's assessments
- other claims handling documents
- The compensation payment data, including:
 - amounts of compensation payments
 - amounts of pensions
 - amounts of savings payments
 - amounts of tax withheld
 - payment dates
 - deductible and other deductions
 - payee's data, such as account number
- The subrogation data, including:
 - data on the recovery of payments made
 - repayer's data.

The complaint and appeal data, including:

- unique complaint identification data
- unique identification data of decisions by appeal bodies
- documents and other materials relating to complaints or appeals.

The customer communications data, including:

- customer letters and newsletters
- chat conversations
- telephone recordings
- online messages.

6. Regular sources of data, and disclosure of personal data

In the main, all data are obtained directly from the data subjects, parties authorised by the data subjects, registers maintained by the authorities (such as Traficom and the Digital and Population Data Services Agency), and LocalTapiola's contractual partners.

Personal data may be disclosed within LocalTapiola Group and to a firm belonging to the same economic interest grouping insofar as permitted under the law.

Personal data are disclosed to parties external to LocalTapiola Group only with the data subject's consent or whenever there is a specific legal ground for the disclosure of data.

Data on the claims filed with LocalTapiola Group are saved into the claims register maintained jointly by insurers, in which connection a check is made as to what claims have been submitted to the other insurers. Based on the data in the claims register, insurers may also exchange more detailed claim data with each other. The data in the claims register are used in claims handling to combat abuse committed against insurers.

Data on the criminal offences and suspected criminal offences committed against LocalTapiola Group's insurance business are registered in the fraudulent claims register maintained jointly by insurers, and a check is made of the data subject's data that are saved in the register. Data in the fraudulent claims register are used in claims handling and in the insurance process to combat crime committed against insurers.

7. Transfer of personal data outside the European Union or the European Economic Area

Personal data may be transferred outside the EU or the EEA insofar as data protection legislation permits.

Some external service providers or other recipients of personal data may be located, or they may process personal data, outside the EU or the EEA. LocalTapiola Group employs the necessary transfer mechanisms available in legislation to ensure that the level of the protection of personal data is not compromised in cases where they are transferred outside the EU or the EEA. Such transfer mechanisms include the European Commission's equivalence decisions and the conclusion of standard clauses with any recipient of data located outside the EU or the EEA.

8. Retention period of personal data

LocalTapiola Group determines the retention periods of personal data with due consideration of the requirements set in the applicable legislation and the smooth operation of business, including claims handling and the insurance process. The insurance business is long-term by nature, which is why the retention periods of personal data are extensive. Often the personal

data of a data subject must be kept stored even after the customer relationship has ended. The purpose of the retention periods is to safeguard the data subjects' and LocalTapiola's rights

The retention periods of data subjects' personal data vary according to the type of transactions they conduct or have conducted. For instance, with statutory motor liability insurance and workers' compensation insurance, insurance and claims data must, as a general rule, be kept for a period of 100 years from the date of termination of insurance or from the last day on which a claim is examined. With voluntary insurance lines, insurance and claims data are kept for at least 10 years from the date of termination of insurance or from the last day on which a claim is examined. Offer data are stored for a minimum period of 18 months from the day of submission of the offer.

9. Principles for the protection of personal data

In the protection of personal data, we use the necessary technical and organisational means that are aligned with best practices, including:

- Limitation and management of access rights
- Registration of personal data processing operations
- Training of and provision of instructions to personnel
- Various encryption and protection techniques
- Monitoring of cyber security
- Firewalls, and differentiation of environments
- Ensuring the security of facilities
- Access control

LocalTapiola Group also requires that the subcontractors it uses ensure the appropriate protection of the personal data processed, and the activity of subcontractors is inspected and audited where necessary.

10. Data subject's rights

Withdrawal of consent

Where the processing of personal data is based on a data subject's consent, the data subject has the right to withdraw their consent to process their data. Such withdrawal has no impact on any processing that has taken place before the withdrawal.

Right of access

A data subject has the right to obtain confirmation as to whether or not their personal data are being processed, as well as enjoying the right to be given a copy of their data.

Right to rectification

A data subject has the right to demand rectification of all inaccurate or incomplete data.

Right of erasure

A data subject has the right to request erasure of their personal data.

Other rights

A data subject has the right to object to the processing of their data for the purposes of direct marketing and direct marketing-related profiling. Under some circumstances, a data subject has the right to request restriction of the processing of their personal data, or to otherwise object to the processing of their personal data. In addition, the data subjects may request the transfer, in a machine-readable format, of the data they themselves have submitted, if technically feasible.

The data subjects may exercise their rights using the contact details provided under Section 2 or some other contact details communicated for this purpose.

Where a data subject finds that the processing of their personal data is not lawful, they may lodge a complaint with the relevant supervisory authority.

*The regional companies:

LocalTapiola Etelä Mutual Insurance Company

LocalTapiola Etelä-Pohjanmaa Mutual Insurance Company

LocalTapiola Etelärannikko Mutual Insurance Company - LokalTapiola Sydskusten Ömsesidigt Försäkringsbolag

LocalTapiola Itä Mutual Insurance Company

LocalTapiola Kaakkois-Suomi Mutual Insurance Company

LocalTapiola Kainuu-Koillismaa Mutual Insurance Company

LocalTapiola Keski-Suomi Mutual Insurance Company

LocalTapiola Lappi Mutual Insurance Company

LocalTapiola Loimi-Häme Mutual Insurance Company

LocalTapiola Länsi-Suomi Mutual Insurance Company

LocalTapiola Pirkanmaa Mutual Insurance Company

LocalTapiola Pohjanmaa Mutual Insurance Company - LokalTapiola Österbotten Ömsesidigt Försäkringsbolag

LocalTapiola Pohjoinen Mutual Insurance Company

LocalTapiola Pääkaupunkiseutu Mutual Insurance Company - LokalTapiola Huvudstadsregionen Ömsesidigt Försäkringsbolag

LocalTapiola Savo Mutual Insurance Company

LocalTapiola Savo-Karjala Mutual Insurance Company

LocalTapiola Uusimaa Mutual Insurance Company - LokalTapiola Nyland Ömsesidigt Försäkringsbolag

LocalTapiola Varsinais-Suomi Mutual Insurance Company

LocalTapiola Vellamo Mutual Insurance Company

