

## **Privacy policy for Employee Benefits Foundation Swiss Life Personnel and Employee Benefits Foundation Swiss Life Personnel Supplementary Insurance**

The purpose of this privacy policy is to inform you about the processing of personal data by the Employee Benefits Foundation Swiss Life Personnel and Employee Benefits Foundation Swiss Life Personnel Supplementary Insurance managed by Swiss Life.

### **1 Introduction**

Within the scope of the occupational provisions implemented by the Employee Benefits Foundation Swiss Life Personnel and Employee Benefits Foundation Swiss Life Personnel Supplementary Insurance (collectively referred to as “Employee Benefits Foundation Swiss Life Personnel”), the Employee Benefits Foundations Swiss Life Personnel and Swiss Life Ltd (collectively referred to as “Swiss Life” or “we”) process personal data.

Swiss Life takes the protection of your privacy and personal data very seriously. Accordingly, the relevant principles of data protection legislation, the Insurance Policies Act, insurance supervisory legislation, the special data protection provisions of the Federal Act on Occupational Old Age, Survivors’ and Invalidity Pension Provision (“BVG”) and other regulatory requirements apply in everyday practice at Swiss Life.

This includes ensuring that Swiss Life protects your personal data adequately and consistently, and safeguards the confidentiality, integrity and availability of your data. To this end we undertake to protect the data received from you against accidental or deliberate manipulation, full or partial loss, destruction or unauthorised third-party access by means of technical and organisational security measures. The controls used for this are based on the globally recognised information security standard ISO/IEC 27001. We also undertake to ensure the rapid recovery and availability of your data and access thereto in the event of a physical or technical incident. Our security measures are continuously developed and enhanced in accordance with technological developments.

This privacy policy provides you with an overview of the processing of personal data by Swiss Life. This description is not exhaustive. Matters relevant to data protection may also be dealt with in other specific privacy policies, regulations, group life insurance contracts, general policy conditions and terms and conditions of business, conditions of participation and similar documents. In the event of any contradictions, the specific privacy policies of the regulations or group life insurance contracts shall take precedence over this policy with regard to data protection.

Further information on data protection in relation to individual products or business activities of Swiss Life, as well as on the processing of your data on our website can be found at <https://www.swisslife.ch/en/privacy>.

## 2 Controller and data protection officer

### 2.1 Data processing in connection with the Employee Benefits Foundation Swiss Life Personnel

If you are a beneficiary of the Employee Benefits Foundation Swiss Life Personnel (see cl. 1), the Employee Benefits Foundation Swiss Life Personnel (c/o Swiss Life Ltd, HR Specialist Unit for Future Provisions, General-Guisan-Quai 40, 8002 Zurich) or Swiss Life Ltd are responsible for the data processing described in this privacy policy.

### 2.2 Data processing in connection with the Employee Benefits Foundation Swiss Life Personnel Supplementary Insurance

If you are a beneficiary of the Employee Benefits Foundation Swiss Life Personnel Supplementary Insurance (see cl. 1), the Employee Benefits Foundation Swiss Life Personnel Supplementary Insurance (c/o Swiss Life Ltd, HR Specialist Unit for Future Provisions, General-Guisan-Quai 40, 8002 Zurich) or Swiss Life Ltd is responsible for the data processing described in this privacy policy.

### 2.3 Contact details for data protection-specific enquiries

If you have any questions or concerns regarding data privacy law in connection with the processing of your personal data by the Employee Benefits Foundation Swiss Life Personnel, the Employee Benefits Foundation Swiss Life Personnel Supplementary Insurance and/or Swiss Life Ltd, please contact the following office:

Swiss Life Ltd  
Data Protection Advisor  
General-Guisan-Quai 40  
P.O. Box  
8022 Zurich  
E-mail: [datenschutz@swisslife.ch](mailto:datenschutz@swisslife.ch)

## 3 Categories of personal data processed

We may process the following categories of personal data for the purposes set out in cl. 4:

- **Master data:** e.g. first and last names, address, country of domicile, gender, date of birth, age, (social) insurance numbers, marital status, languages, nationality, residence permit, e-mail address, telephone numbers, occupation, employer, level of employment, salary, health data, family members and other beneficiaries;
- **Data from applications and offers including any supplementary questionnaires:** e.g. details provided by the applicant concerning the insured risk, answers to questions, health data, expert reports, details of the previous insurer such as claims experience to date;
- **Contract, claim and benefit processing data:** e.g. data on the contract of affiliation and pension plan, amount of your retirement savings, details of any purchases, early withdrawals or pledges for home ownership and pension compensation as a result of divorce, details of insured and current benefits, data in connection with applications, requests and insured events (in particular retirement, disability and death), including associated data on state of health as well as medical reports, expert reports and details of any proceedings and benefits from other (social) insurers, details of limitations for pre-existing conditions;
- **Financial data:** e.g. income data, account data;
- **Payment data:** e.g. payment method data, date and amount of incoming payments, outstanding and paid invoices, reminders;
- **Communication data:** e.g. type, time and place of communication and its content;

- **Data in connection with online communication with Swiss Life:** When using our customer portal, this includes in particular the IP address, access data and detailed information on use such as behavioural and preference data;
- **Data in connection with legal proceedings and disputes:** e.g. data concerning complaints and differences in benefits or related contracts;
- **Data from publicly accessible sources:** e.g. data from the debt collection register, land registers, commercial register, the press or internet, or data from other companies within the Swiss Life Group, from authorities or other third parties.

We usually receive personal data in the above-mentioned categories from you, from your employer and your reinsured employee benefits institution (e.g. master or contract data). but also potentially from third parties such as contractual partners, your family members, address service providers (master data), credit reporting agencies and other information service providers (e.g. master and financial data), representatives of yourself and other persons associated with you, and other sources (e.g. the media or internet).

If you act on behalf of third parties or provide us with third-party data (e.g. when designating beneficiaries), we kindly ask you to inform these third parties in advance about our processing of their personal data. We also ask you not to disclose to us any personal data of third parties without their consent.

## 4 Processing purposes

Swiss Life processes personal data within the framework of occupational provisions for the following purposes:

### 4.1 Implementation of occupational provisions

Your personal data are processed for the purpose of implementing occupational pensions, which includes in particular the following sub-purposes:

- Processing and managing offers and contracts;
- Staff orientation (in connection with an employer's affiliation with the Employee Benefits Foundation Swiss Life Personnel);
- Risk assessment;
- Administration of insured persons and beneficiaries (e.g. processing of admittance, departure, address changes, benefit or beneficiary changes and other changes);
- Assessing and calculating entitlements to benefits;
- Answering your queries and concerns;
- Calculation and collection of contributions and premiums;
- Pricing;
- Advising insured persons and other beneficiaries;
- Providing benefits and processing payment transactions;
- Preparing certificates and documentation in connection with the employee benefits and/or insurance relationship;
- Providing information to and notifying the responsible supervisory authorities within the framework of the statutory duty to provide information;

- Communicating with the affiliated employer, the insured person and any other beneficiaries and providing information to the employer in accordance with the statutory and contractual provisions;
- Contacting the insured persons and beneficiaries and issuing documents concerning the implementation of occupational provisions;
- Asserting rights of recourse against liable third parties.

For these purposes, we process in particular master data, contract, claims and benefit processing data, payment data and communication data. Health data may be processed for risk assessment purposes.

#### **4.2 Legal obligations and combating abuse**

The processing of personal data is necessary to comply with legal and regulatory requirements. For this purpose we process, in particular, master data, contract data and financial data, as well as behavioural and communication data.

If insurance fraud is suspected, we are entitled, subject to the principles of proportionality and data protection, to process personal data and pass it on to other insurers in Switzerland and abroad as well as to courts and authorities for the purpose of detecting or preventing insurance fraud.

#### **4.3 Customer information and investigations**

Swiss Life uses personal data to an appropriate extent for voluntary participation in surveys and investigations for customer information purposes and to evaluate customer satisfaction. The answers from all the survey respondents are consolidated and anonymised and used anonymously for statistical purposes (no interviews are conducted with open or covert advertising, sales or business intentions).

#### **4.4 Data processing on myPension**

Swiss Life provides active insured persons with an online customer portal (myPension) to use.

Personal data can be accessed in myPension which can be processed within the scope of the portal's functions. Such processing is used for the administrative implementation of the occupational provisions.

#### **4.5 Other processing purposes**

Your data is processed beyond the actual fulfilment of the contract or mandate if this is necessary to uphold Swiss Life's legitimate overriding interests or those of third parties. Examples include:

- Processing of personal data for the purpose of protecting data, secrets and assets;
- Processing of personal data (including temporary video recordings) for the security of systems and buildings;
- Processing of personal data for optimising and ensuring the functioning and security of the website(s) and other IT systems, preventing fraud, misdemeanours and crimes, as well as investigating such offences and other unlawful conduct, handling legal action and asserting, exercising or defending legal claims.

## 5 Data recipients

Your personal data may be disclosed to the following categories of recipients insofar as this is necessary for the purposes set out in cl. 4:

- Employees that are affiliated to the Employee Benefits Foundation Swiss Life Personnel;
- Insured persons and beneficiaries;
- Persons authorised by the insured person;
- Benefit recipients;
- Brokers and insurance intermediaries;
- Previous insurers, co-insurers and reinsurers;
- Employee benefits institutions and social security schemes;
- Authorities, register offices, courts and offices;
- Other third parties, e.g. banks;
- Internal and external service providers of Swiss Life (e.g. IT service providers, address and shipping service providers, marketing, distribution, communication or printing service providers, service providers in building management, credit reporting agencies, debt collection service providers, consulting firms, auditors, etc.).

Personal data relating to occupational provisions are stored exclusively in Switzerland. Other recipients may be located abroad (e.g. if the insured person or beneficiary is not domiciled in Switzerland or the address for service is not in Switzerland, when transmitting personal data to banks and other bodies in connection with assets located abroad, when purchasing IT services from abroad, in foreign legal proceedings, etc.). Personal data may therefore be processed anywhere in the world, including outside the EU or the European Economic Area (e.g. in the USA or on other continents). Not all of these countries have a level of data protection equivalent to Swiss law. We therefore take contractual precautions and generally make use of standard contractual clauses (further information can be found at <https://www.edoeb.admin.ch/edoeb/en/home.html>), unless an exception applies (e.g. in legal proceedings abroad, in cases of overriding public interest, if the processing of a contract requires such disclosure, or if the data subject has given their consent). If further measures are required as a result of a specific instance of data transmission, we will also take this into account appropriately. Please note that while contractual provisions may partially compensate for weaker or missing legal protection, they cannot fully exclude all risks (e.g. of government interventions abroad).

In addition, the transmission and disclosure of data to third parties (including authorities and other social insurance schemes) takes place in compliance with the special provisions contained in the BVG.

The provisions of special law under Art. 3 of the Vested Benefits Ordinance ("FZV") are taken into account when transmitting medical data in the case of vesting.

## 6 Automation of individual decisions

Swiss Life does not make any automated individual decisions based on personal data. Should this change in the future, Swiss Life will ensure transparency and the associated rights. If we notify you of an automated decision in a specific instance, you have the right to state your position and to request that the decision be reviewed by a natural person.

## 7 Duration of processing

Data is stored for as long as the processing purposes, statutory retention periods and legitimate interests of the Employee Benefits Foundation Swiss Life Personnel or Swiss Life Ltd in processing for documentation and evidence purposes require, or storage is technically necessary. The storage duration is based on legal and internal regulations and the processing purposes (cl. 4). If these purposes have been achieved or no longer apply and there is no longer any obligation to retain your data, we will delete or anonymise the data as part of the usual procedures at Swiss Life.

## 8 Your rights

You have certain rights as defined by the relevant legal conditions and framework:

- To request information from us as to whether and which data we process about you;
- To have data corrected by us if it is inaccurate;
- To object to our processing and to request the deletion of data if we are not obliged or entitled to process it further;
- To ask us to hand over certain personal data in a conventional electronic format or transfer the data to another controller;
- To revoke your consent if our processing is based on your consent.

If you wish to exercise any rights against us, please contact us in writing or by e-mail (contact details listed in cl. 2). In order to rule out misuse, we will need to identify you.

If you do not agree with our handling of your rights or data protection, please let us know as specified under cl. 2. The Swiss supervisory authority can be reached at <https://www.edoeb.admin.ch/edoeb/en/home.html>.

Should the provision or disclosure of information be manifestly unfounded or not possible, in particular due to a law, a judicial order, overriding interests of third parties or for other reasons, we are entitled to refuse, restrict or postpone such provision or disclosure of information.

## 9 Updating our data privacy policy

This privacy policy is for your information and does not form part of the contract. Swiss Life reserves the right to modify this privacy policy at any time without prior notice, especially to take account of current statutory provisions and changed business procedures. The version published on our website applies in each case.

Last update: October 2023