

We hereby inform you about the processing of personal data by Zurich Resilience Solutions Europe GmbH and the other Zurich entities involved, as well as about the rights you are entitled to under data protection law.

Usually, no personal data relating to natural persons is processed in the context of the resilience services; instead, we process data relating to corporate or industrial customers as legal entities (juristic persons), to which the EU General Data Protection Regulation (GDPR) does not apply.

The following privacy notice therefore applies to the remaining exceptional cases in which personal data are processed (e.g. in the case of clients who are not legal persons, or for the processing of data relating to the risk engineers involved in the respective countries).

Controller (responsible for data processing):

Zurich Resilience Solutions Europe GmbH
Platz der Einheit 2
60327 Frankfurt am Main
Telefon: 069 7115-0
Fax: 069 7115-3358
E-Mail: service@zurich.de

Our **Data Protection Officer** can be contacted at:

Post: Zurich Gruppe Deutschland
Konzerndatenschutz
50427 Köln
E-Mail: datenschutz@zurich.com

Source and categories of personal data

In principle, we collect personal data directly from the data subject. However, in certain cases we may receive personal data from third parties.

Examples:

- If an existing customer of a branch of Zurich Insurance Europe (ZIE) would like to receive risk engineering services from Zurich Resilience Solutions Europe GmbH (ZRSE) and asks for the customer-data to be transferred for this purpose.
- If you are named to us as a contact person by your employer and they provide us, for example, with your name, email address, telephone or mobile number.
- If you act as a member of management or as a corporate officer of a company and, in the course of risk engineering, we assess whether there may be risks that make it advisable to consider you as an insured person under appropriate risk coverage.
- Or it may be necessary, for risk analysis purposes, to speak with the relevant subject-matter experts in specific business areas of the customer. In this context, your contact details may be provided to us.
- In the case of returned mail, specialized service providers

carry out an address search to determine up-to-date address details.

- We receive data on co-insured persons and/or insured persons from our sister insurance company, insofar as our risk engineering customer has the relevant data passed on to us for the purpose of carrying out the risk analysis.
- We may receive data on collateral providers, lenders, lessors, surety or guarantee beneficiaries and creditors from our customer. Conversely, we may receive data about our customer from those parties, in particular contact details and information about the relevant risk.
- In the context of legal disputes, we receive data from persons involved, such as witnesses, lawyers, experts, etc.
- We may also receive data via your responsible intermediary, for example in connection with a request for risk engineering services.

Purposes and legal bases for processing

We process personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (Bundesdatenschutzgesetz – BDSG) and all other applicable laws for the purpose of entering into, performing or administering a contractual mandate/engagement, including the related correspondence.

If, in connection with ZRSE's risk engineering services, you would like us to assess which risks may already be covered by existing insurance policies, data will also be required for this purpose. If you would also like proposed solutions and/or an offer from Zurich Insurance Europe (ZIE) to cover existing risks, ZRSE will pass on data relating to those risks to Zurich Insurance Europe (ZIE). If a contract for risk engineering services is concluded with ZRSE or an insurance contract is concluded with ZIE, we process this data via a shared system.

The provision of ZRSE's risk engineering services is not possible without the data processing described above.

In addition, we require personal data to compile statistics, for example to further develop our risk engineering services or to comply with regulatory requirements. We use the data from all contracts existing with a Zurich company to review the overall customer relationship, in order to optimise our advice and services, and also to review our contracts, make goodwill decisions, or provide the relevant information.

The legal basis for processing personal data for pre-contractual and contractual purposes, as well as for claims handling, is Art. 6(1)(b) GDPR. Where special categories of personal data are required for this purpose (which is generally not the case in the commercial sector), we obtain your consent in accordance with Art. 9(2)(a) in conjunction

with Art. 7 GDPR. Where we compile statistics using these categories of data, this is done on the basis of Art. 9(2)(j) GDPR in conjunction with Section 27 BDSG.

We also process personal data in order to pursue our legitimate interests or those of third parties (Art. 6(1)(f) GDPR). This may be necessary in particular:

- to ensure IT security and IT operations,
- to train and test applications in a legally permissible manner,
- to review your overall customer relationship with the companies of the Zurich Group, including identifying target groups for marketing purposes,
- to advertise our own products and other products of the companies of the Zurich Group and their cooperation partners, and to carry out market and opinion research, where legally permissible,
- to prevent and investigate criminal offences or to optimise processes (e.g. when reviewing compliance with anti-money laundering and counter-terrorist financing requirements (German Money Laundering Act – GWG) and sanctions regulations),
- to use transcription applications.

In addition, we process personal data in order to comply with legal obligations (e.g. under the German Limited Liability Companies Act (GmbHG), the German Trade Regulation Act (GewO), the German Commercial Code (HGB), the German Act Against Unfair Competition (UWG), the GDPR, etc.), with retention obligations under commercial and tax law (HGB, German Fiscal Code (AO)), or to comply with anti-terrorist financing requirements (German Money Laundering Act – GWG) or sanctions screening requirements. In these cases, the legal basis for the processing is the respective statutory provision(s) in conjunction with Art. 6(1)(c) GDPR.

If we intend to process personal data for a purpose not listed above, we will inform you in advance in accordance with the applicable legal requirements.

Categories of recipients of personal data

Intermediaries (agents/brokers):

To the extent that an intermediary or broker supports you in relation to your insurance contracts and you also involve them in the provision of risk engineering services, your intermediary will process the data required for this purpose

Data processing within Zurich Group Germany:

Specialised companies and/or functions within our group perform certain data processing tasks centrally for the companies affiliated within the Zurich Group.

Where a contract exists with one or more companies of our group, your data may, for example, be processed centrally by a group company for the central administration of address data, telephone customer service, policy and claims handling, receivables and payables (in- and out-payments/collections), or joint mail handling. The companies participating in centralised data processing are listed in the

current version of the Zurich Group Germany service provider overview available on our website at www.zurich.de/datenschutz.

External service providers:

To fulfil our contractual and legal obligations, we use external service providers in some cases. A list of the contractors and service providers we use with whom we have ongoing (i.e. not merely temporary) business relationships can be found at www.zurich.de/datenschutz.

Further recipients:

In order to be able to provide the risk engineering services in the respective European countries, ZRSE cooperates with the ZIE branches listed below, which provide it with local expertise. Further recipients of personal data may, where necessary, include authorities for the fulfilment of statutory notification and reporting obligations (e.g. social security institutions, tax authorities or law enforcement authorities)

Retention period

We delete personal data as soon as it is no longer required for the purposes set out above. In this context, it may be necessary to retain personal data for the period during which claims may be asserted against our company (statutory limitation periods of three years and, in certain cases, up to thirty years). In addition, we retain personal data to the extent that we are legally obliged to do so. Relevant documentation and retention obligations arise, among others, under the German Commercial Code (Handelsgesetzbuch), the German Fiscal Code (Abgabenordnung) and the German Money Laundering Act (Geldwäschegesetz). Under these provisions, retention periods can be up to ten years.

Information on the key elements of a joint controllership arrangement

In order to be able to provide expert risk engineering advice across Europe, ZRSE cooperates with the companies listed below when providing qualified local risk engineering expertise. A joint controllership arrangement has been concluded for the related processing of personal data. The key elements are as follows:

- All involved companies ensure compliance with the data protection requirements applicable to their customers' data in the countries where their customers are located.
- ZRSE provides the privacy notice.
- As a rule, ZRSE is responsible for handling data subject rights requests. You can contact ZRSE using the controller contact details provided above. If a data subject contacts another participating party, that party will forward the request to ZRSE.

The following further Zurich companies are involved in providing local risk engineering expertise:

- Zurich Insurance Company Ltd., Mythenquai 2, 8002 Zurich, Switzerland; Contact for privacy-requests: Privacy Compliance Officer, E-Mail privacy@zurich.com

- Zurich Insurance Europe, Niederlassung für Deutschland, Platz der Einheit 2, 60237 Frankfurt a.M., Germany; Contact Data Privacy Officer: datenschutz@zurich.com
- Zurich Insurance Europe, Finland Branch, Eteläespladadi 22A, 00130, Helsinki, Finland; Contact Data Privacy Officer: tietosuojavastaava.fi@zurich.com
- Zurich Insurance Europe, Denmark Branch, Frederiksgade 17, 1, 1265 København K, Denmark; Contact Data Privacy Officer: databeskyttelsesradgiver.dk@zurich.com
- Zurich Insurance Europe, Norway Branch, Bygdøy Alle 1, 0257 OSLO, Norway; Contact Data Privacy Officer: personvernombud.no@zurich.com
- Zurich Insurance Europe, Sweden Branch, Linnégatan 5, 114 47 Stockholm, Sweden; Contact Data Privacy Officer: dataskyddsbud.se@zurich.com
- Zurich Insurance Europe, Belgium Branch, Corporate Village, Building Caprese, Da Vincilaan 5, 1930 Zaventem, Belgium; Contact Data Privacy Officer: nathalie.parmen-tier@zurich.com
- Zurich Insurance Europe, Netherlands Branch, World Trade Center, Prinses Margrietplantsoen 65, 16th floor, 2595 BR Den Haag, The Netherlands; Contact Data Privacy Officer: goddin.lee@zurich.com

Data subject rights

You may request information about the personal data stored about you at the address stated above. In addition, under certain conditions, you may request the rectification or erasure of your personal data. You may also have the right to request restriction of the processing of your personal data and the right to receive the data you have provided in a structured, commonly used and machine-readable format.

Right to object

You have the right to object, at any time and without giving reasons, to the processing of your personal data for the purposes of direct marketing. If we process your data on the basis of legitimate interests, you may object to such processing on grounds relating to your particular situation. We will then no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defence of legal claims.

Right to lodge a complaint

You may submit a complaint to the Data Protection Officer of ZRSE named above. You also have the right to lodge a complaint with a data protection supervisory authority. The data protection supervisory authority responsible for us is:

Der Hessische Datenschutzbeauftragte
Postfach 31 63
65021 Wiesbaden

Data Transfer into a third country

If we transfer personal data to service providers outside the European Economic Area (EEA), such transfers will take

place only if the European Commission has confirmed that the third country ensures an adequate level of data protection, or if other appropriate safeguards are in place (e.g. binding corporate rules or EU Standard Contractual Clauses). Detailed information on this, as well as on the level of data protection ensured by our service providers in third countries, can be found in the overview of service providers of Zurich Group Germany on our website at www.zurich.de/datenschutz.

Updates to this privacy notice

This privacy notice may be amended at a later date due to changes (e.g. changes in legal requirements). The current version of this notice, as well as the list of service providers, can be found at: www.zurich.de/datenschutz.