

PRIVACY NOTICE OF NON-LIFE INSURANCE CLAIMS DATA FILE

This privacy notice describes what personal data is stored in the LocalTapiola Group's non-life insurance claims data file, what the data is used for, how the data is protected and how the data subject can obtain further information regarding their personal data.

1. Controller

LocalTapiola Group
Revontulenkujä 1
FI-02010 LÄHITAPIOLA

The following companies belonging to the LocalTapiola Group act as the controller:

1. LocalTapiola General Mutual Insurance Company
2. LocalTapiola's regional companies (20 companies) *

Further information on the LocalTapiola Group is available on LocalTapiola's website at www.lahitapiola.fi.

2. Contact person responsible for the data file

For further information on the personal data contained in the claims data file and its processing, please contact the Data Protection Officer of the LocalTapiola Group. In addition, information on the personal data processing principles across the entire LocalTapiola Group can be found on LocalTapiola's website at www.lahitapiola.fi.

By email: tietosuoja@lahitapiola.fi

By mail: LocalTapiola Group
Legal and compliance / Data Protection Officer
FI-02010 LÄHITAPIOLA

3. Purpose and grounds for processing of personal data

The personal data in the data file is used for claims processing based on the LocalTapiola Group's non-life insurance policies. The data is required for the comprehensive management of claims matters, customer service and communication, and fulfilling regulatory requirements. The data will also be used for marketing LocalTapiola Group's services and products, for monitoring, analysing and compiling statistics on their use, and for product and service development.

The data subjects' personal data is processed in accordance with the EU General Data Protection Regulation (hereinafter GDPR), Finnish data protection laws, insurance laws and other applicable regulations.

The processing of personal data within the scope of the data file may include automated decision-making. Automated decision-making is used, for example, when customers purchase an insurance policy online or for processing claims, where its purpose is, inter alia, to enhance the provision of services. The use of automated decision-making is expressly indicated in

connection with each service where automated decision-making is used. If necessary, the data subject's consent will be asked for its use.

The processing of personal data within the scope of the data file includes profiling. Profiling is utilised, for example, for targeting marketing, where its purpose is to ensure that the marketed products and services meet the needs of the customers.

General information on automated decision-making, profiling and the related rights can be found on the LocalTapiola website at www.lahitapiola.fi.

Customer due diligence information and the data subject's other personal data may be used for the prevention, uncovering and investigation of money laundering and the financing of terrorism, and in bringing under investigation money laundering and financing of terrorism as well as the crime committed to obtain the assets or proceeds of crime involved in the financing of money laundering or the financing of terrorism.

Grounds for processing:

LocalTapiola processes the data subject's personal data mainly based on a contractual relationship and the measures preceding it.

Processing of personal data may also be based on

- the data subject's consent, such as consent to obtain medical records from a medical establishment or to receive electronic direct marketing,
- the controller's statutory obligations, such as the requirements of tax legislation and the Insurance Companies Act, or
- the legitimate interests of the controller, such as use of data for direct marketing, provided that the data subject is aware of it and has not forbidden it, for directed online marketing, and to prevent crimes against insurance companies. Usually, the controller's legitimate interest is based on the customer relationship or comparable relationship between the controller and data subject, such as paying compensation to an injured party outside the customer relationship.

Processing the data subject's health status data in the data file is based on LocalTapiola's statutory obligation or the data subject's consent.

4. Categories of data subjects

Claims customers

5. Personal data stored in the data file

- Details of the customer associated with the loss event (see further information in the customer data file privacy notice)
 - tax data used for withholding of tax
- Information on the loss or damage/loss event
 - Information on the loss or damage/loss event reported by the customer
 - Information provided by third parties required for processing the loss event, such as statements from the police or doctors regarding the loss event
 - Loss event number and date on which processing was initiated
 - disability period and degree of disablement

- Information on the claims decision
 - information on compensation
 - duration of the compensation
 - information on advance decisions and rejections
- Material required for making a claims decision
 - report on accident/occupational disease
 - insurance certificate
 - claims applications and the attached documents
 - health-related medical statements
 - police investigation records
 - medical bills
 - examination and treatment orders
 - tax and salary calculations
 - decisions
 - expense receipts
 - other documents related to claims processing
- Information on claims payments
 - amounts of claims payments
 - amounts of pensions
 - amounts of savings payments
 - amounts of withholding tax
 - payment dates
- Information on recourse claims
 - information on recovery of a payment
 - information on the repayer
- Customer communications data
 - information on claims decisions
 - information on pension and savings payment reports
 - online message data
 - call recording data
- Complaints
 - identifying details of a complaint
 - identifying details of the decision of an appeals body

6. Regular data sources and disclosure of personal data

The data in the personal data file is obtained directly from the data subject, parties authorised by the data subject, registers maintained by public authorities and the credit data register.

Personal data is only disclosed outside the LocalTapiola Group with the data subject's consent or when there is a special legal basis for disclosure.

Information on claims reported to the LocalTapiola Group are entered in the Finnish insurance companies' shared claims register. Any claims reported to other insurance companies will be checked at the same time. Insurance companies may also exchange more detailed information regarding claims on that basis of the information in the claims register. The

information in the claims register is used in claims processing to prevent fraud against insurance companies.

Information on crimes and suspected crimes against the LocalTapiola Group's insurance operations is entered into the insurance companies' shared fraudulent claims register, and any information on the customer entered in the register is checked. Information in the fraudulent claims register is used in claims and insurance processing solely to prevent crimes against insurance companies.

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

Personal data may be transferred outside the EU and EEA within the limits of data protection legislation.

The LocalTapiola Group will only transfer personal data outside the EU and EEA to organisations for which the LocalTapiola Group has ensured an adequate level of data protection through a contract or in some other manner required by data protection legislation.

8. Retention period for personal data

The LocalTapiola Group defines the retention period for personal data taking into consideration the requirements of applicable laws as well as the management, functioning and efficiency of the business, such as claims settlement and the management of insurance policies. The insurance business is long-term by nature, which means that the retention periods for personal data are long. Personal data concerning the data subject may often need to be retained even after the customer relationship has ended. The purpose of the retention periods is to secure the rights of both the data subjects and LocalTapiola.

The retention period of the data subject's personal data varies according to the type of services used by the data subject. For example, in the case of statutory motor liability and accident insurance, the retention period for insurance and claims data is usually 100 years from the date of termination of the insurance policy or from the last claim processing date. In many voluntary insurance types, information on insurance contracts and claims is retained for a minimum of 20 years from the date of termination of the insurance policy or from the last claim processing date.

9. Personal data protection principles

1. Data processing rights management is used to monitor that only authorised persons may process the data in the file
2. The persons who process the data are bound by confidentiality
3. The data file is maintained in the LocalTapiola Group network, which is isolated from the public communications network by firewall solutions
4. Confidential data transferred via the public communications network are electronically encrypted
5. A register is maintained for the use of data from the data file
6. The documentary material of the data file is stored in premises secured with access control, and their use is monitored through access rights management

10. Data subjects' rights

Right of access

Data subjects have the right to review the data stored in the data file concerning them. The review request must be sent signed and in writing to the contact person responsible for the data file referred to in section 2.

Right to rectification

Data subjects have the right to demand the rectification or completion of inaccurate or incomplete data by sending a request in writing and with their signature.

Right to object

Data subjects have the right to forbid the controller from processing their personal data for direct marketing, profiling related to marketing or direct marketing, remote sales, or for marketing surveys and opinion polls. The objection request must be sent signed and in writing to the contact person responsible for the data file referred to in section 2.

Other rights

Once the GDPR is applicable, data subjects will, in certain circumstances, also have the right to request the erasure of their personal data, the restriction of processing of their personal data, or otherwise object to the processing of their personal data. Under the GDPR, a data subject can also request the transfer of personal data that they have provided in a machine-readable format, where technically feasible.

Data subjects have the right to lodge a complaint with a data protection authority if they consider that the processing of their personal data is unlawful.

*Regional companies:

LocalTapiola Etelä Mutual Insurance Company

LocalTapiola Etelä-Pohjanmaa Mutual Insurance Company

LocalTapiola Etelärannikko Mutual Insurance Company

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 Lännen Mutual Insurance Company

LocalTapiola Pirkanmaa Mutual Insurance Company

LocalTapiola Pohjanmaa Mutual Insurance Company

LocalTapiola Pohjoinen Mutual Insurance Company

LocalTapiola Pääkaupunkiseutu Mutual Insurance Company

LocalTapiola Satakunta Mutual Insurance Company

LocalTapiola Savo Mutual Insurance Company

LocalTapiola Savo-Karjala Mutual Insurance Company

LocalTapiola Uusimaa Mutual Insurance Company

LocalTapiola Varsinais-Suomi Mutual Insurance Company

LocalTapiola Vellamo Mutual Insurance Company