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1. SOLID FÖRSÄKRING'S PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE GENERAL DATA PROTECTION REGULATION

Solid Försäkringsaktiebolag (516401-8482) ("Solid Insurance") is the controller responsible for processing your personal data. This means that it is our duty to ensure that processing is carried out securely and in accordance with applicable laws and regulations.

2. COLLECTION OF PERSONAL DATA

When you become a customer or show interest in becoming a customer of Solid Insurance you are asked to provide certain personal data about yourself, such as name, address, personal ID no., e-mail address, telephone number, information about your employment, age, gender, general insurance information, such as insurance number, insured amount, etc., detailed insurance information related to the specific type of insurance, such as information about the property or individual depending on the type of insurance taken out or registered.

We may also need to process special categories of personal data (sensitive data) such as information about health in order to assess the right to insurance compensation in accordance with an insurance contract or information about a crime such as reports of suspected insurance fraud or for claims against a tortfeasor.

The data is obtained directly from you but may also be obtained from, for example, other companies within the Group, from any of our partners, insurance brokers or from your employer. The data may also be obtained or supplemented and updated from government records or other private and public records. We may also retrieve information from external information services, such as when updating names and address details from a registry company, for example SYNA.

3. PURPOSES OF PERSONAL DATA PROCESSING

Solid Insurance processes the personal data for the purposes listed below. Such processing is necessary for the following purposes.

<u>Preparation and administration of agreements (entering into or performance of contracts)</u>

The main purpose of Solid Insurance's processing of personal data is to collect, verify and register personal data prior to entering into a contract with you. The purpose is also to offer advice on insurance and related services such as calculating premiums, statistics and claims prevention. The data is also processed to document, administrate and perform existing contracts. The provision of relevant personal data is a prerequisite to enable Solid Insurance to enter into a contract with you and to provide insurance.

Compliance with obligations under law, other regulatory provision and/or regulatory decision (legal obligation)

In connection with the above, personal data is also processed in order for Solid Insurance to comply with its obligations under law, other regulatory provision and/or regulatory decision. One example of such processing is the processing of personal data to fulfil the requirements set out in the Swedish Insurance Contracts Act, Swedish Accounting Act and laws on risk management. Personal data may also be processed when reporting to various authorities, including the Swedish Tax Agency, the Swedish Police Authority, the Enforcement Authority and the Swedish Financial Supervisory Authority.

Market and customer analyses, system development and marketing (legitimate interest)

Personal data is also processed in the context of market and customer analyses and system development, as part of Solid Insurance's business development to improve Solid Insurance's product range and services to our customers and also to prevent, investigate and combat fraud.

Personal data may be processed for marketing purposes. In processing for marketing purposes, profiling may be used to send customised offers to you (see more on Profiling in Section 7).

If you have not requested direct mail blocking (see Section 10 Blocking direct mail below), personal data may be used to target direct advertising and offers to you.

Consent to the processing of personal data

When the legal basis for the processing of personal data is consent, you, or other data subject, may submit consent to the processing of personal data for the purposes stipulated in the consent. If we use consent as the legal basis for the processing of your personal data, you have the right to withdraw your consent at any time. Solid Insurance has subsequently no right to process the data on the basis of consent. However, a withdrawal of consent does not influence the legality of the processing carried out on the basis of consent prior to the withdrawal.

In certain cases, sensitive personal data may be processed without consent. For example, Solid Insurance may process sensitive personal data when it is necessary for the establishment, exercise or defence of legal claims. The processing carried out when assessing your right to insurance compensation as stated in your insurance contract is therefore not based on consent but rather on performing a contract.

4. LENGTH OF TIME PERSONAL DATA IS STORED

Solid Insurance only stores personal data during the time it is necessary pursuant to agreements, laws and regulations applicable to insurance activities.

Personal data will be stored for as long as a contractual relationship exists between you and Solid Insurance and as long as you can make claims under the agreement, meaning the personal data will be stored during the term of the insurance contract and the payment period, which follows statutory limitation periods.

In some cases, laws exist that oblige Solid Insurance to store the data for longer, for example that Solid Insurance must fulfil applicable legislation pertaining to accounting (7+ current year) and limitations (10 years). Data may also be stored under regulations on insurance distribution (at least 11 years).

If you do not enter into an agreement with Solid Insurance, your personal data is stored for at most three months.

5. PROCESSING OF PERSONAL DATA BY A PARTY OTHER THAN SOLID INSURANCE

For the purposes stipulated above, we may need to disclose personal data about you to other parties in their role as processor to us or in their role as controller. The processing of personal data may, within the framework of the applicable rules of confidentiality, be performed by 1) companies in the Group, for example for payment protection insurance, 2) by companies that the Group cooperates with in order to perform its services, such as claims adjustment, risk assessment, reinsurance, various analyses, 3) by other insurance companies when due to insurance or law these are also responsible or it is necessary for our investigations, 4) by authorities such as the police authority, 5) by insurance brokers and others with a mandate from you to receive information about you and your insurance policies, 6) authorities, courts and insurance boards in the event of disputes or other examination or when there exists other legal justification to process the personal data. The legal basis for processing is shown above under Purposes of personal data processing.



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6. AUTOMATED DECISION

In some cases, Solid Insurance uses automated decision-making. For example, automated decision-making may occur when you use Solid Insurance's online services to obtain premium information and in some claims adjustment. When you use our online services to take out an insurance, we process your information to enable an automated calculation of your price in relation to the risk based on the applicable premium tariffs prevailing at the time. When you use our online services to report and settle an insurance case, we may sometimes immediately offer you an automated decision on your compensation. This is possible for certain types of insurance policies in cases that are uncomplicated.

Compensation is then automatically calculated based on the terms of the insurance policy. The legal basis for this processing is entering into or performing contracts.

If you do not wish to use our online services, you may instead contact Solid Insurance's customer service centre by e-mail or phone and a processor will help you to purchase your insurance policy or settle your claim.

If you have received a decision based solely on automated decision-making, you may contact Solid Insurance's customer service centre by e-mail or phone and your case can be processed manually by a human processor if you wish to express your opinion or contest the decision if it could have legal consequences or similarly have a significant impact on your situation.

7. PROFILING

Profiling refers to automated processing of personal data to evaluate certain personal aspects relating to a natural person. Solid Insurance's makes particular use of profiling to personalise the customer experience, to obtain statistics for analysis or to forecast expected behaviour. The legal basis for this processing is Solid Insurance's legitimate interest in processing the personal data to ensure that you are offered the right insurance policy, to avoid giving you unnecessary information and to prepare the products and services that perhaps interest you the most. You have the right to oppose profiling related to direct marketing. You do this by contacting Solid Insurance's customer service centre by phoning +46 771 113 113 or by e-mailing kunder@solidab.se.

8. TRANSFER TO A THIRD COUNTRY

In certain limited cases, Solid Insurance may transfer or share personal data with insurance companies, healthcare providers, companies or authorities outside of the EU/EEA (third country), for example if you are travelling abroad and claim compensation under the travel cover of your travel insurance. In such case, Solid Insurance will take steps to ensure that your personal data is processed securely and with an adequate level of protection comparable to and at the same level as the protection offered within the EU/EEA.

9. YOUR RIGHTS

The following is a description of your rights as a customer of Solid Insurance or are otherwise registered with us. The rights comply with GPDR.

Register extract

You have the right to receive information about Solid Insurance's processing of your personal data (register extract). A prerequisite if you are to receive a register extract is that Solid Insurance can securely identify you to ensure that unauthorised parties are not given the opportunity to access your data.

Right to rectification

You have the right to the rectification of inaccurate personal data about yourself and also provide additional personal data if this is incomplete.

Data portability

You may also request an electronic copy of the information showing the personal data you have provided to Solid Insurance and that we process electronically. You can request that the data is transmitted to another controller, where technically feasible. The right to data portability applies in cases when our processing is taking place on the basis of consent or if processing is required for the performance of a contract with you. A request for data portability is made in the same manner as a request for a register extract and, as in that case, it is necessary that Solid Insurance can securely identify you to ensure that unauthorised parties are not given the opportunity to access your personal data.

Right to restriction or right to be forgotten

Under certain conditions, you have the right to request that the processing of your personal data is restricted. Similarly, you have the right in certain cases to request that we erase your personal data. However, in most cases our processing is supported by an insurance contract with you and we can therefore not erase such data as we need to fulfil or prove our contract with you. In some cases other legislation exists for Solid Insurance that means Solid Insurance may not always be able to immediately erase your personal data. For example, Solid Insurance is obliged to store some of your personal data for a certain time in order to meet the requirements of legislation and regulations, such as accounting, limitations and insurance distribution.

Right to object

You have the right to object to Solid Insurance's processing of your personal data when this processing takes place on the basis of our legitimate interest, for example, for direct marketing.

If you wish to exercise any of your rights above or have questions regarding the processing of your personal data, you can contact Solid Insurance using the contact details in Section 12. Questions concerning personal data processing.

10. BLOCKING DIRECT MAIL

You can contact Solid Insurance to request a block of direct marketing (direct mail blocking). This means that your personal data will not be processed for marketing purposes and neither will marketing be sent to you. Requests for blocking shall be made to Solid Insurance's customer service centre on telephone +46 771 113 113 or by email to kunder@solidab.se.

11. SPECIFIC INFORMATION CONCERNING PHONE CALLS

Solid Insurance may record phone calls, store e-mail communication or otherwise document your interaction and communication with Solid Insurance. Individuals other than the person to which you are speaking may also listen to phone calls you make (listening-in).

Recording phone calls and listening-in takes place in order to fulfil legal obligations as the law on insurance distribution imposes requirements on the knowledge and skills of employees. The recording of phone calls and listening-in enables Solid Insurance to quality-assure the development of its employees. Recordings are also made to improve the customer experience and to document contractual agreements.

If Solid Insurance records a phone call you will immediately be informed in conjunction with recording the call that the call is being recorded and its purposes.



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Phone calls recorded when contacting customer service centre will be stored for three months.

12. QUESTIONS ABOUT PERSONAL DATA PROCESSING

For questions about personal data processing, please contact Solid Insurance:

Data protection officer Solid Insurance

Telephone: +46 42 38 21 00 E-mail: DPO@solidab.se Address: Solid Försäkring Box 22068 SE-250 22 Helsingborg, Sweden

You can also contact the Swedish Data Protection Authority, Integritetsskyddsmyndigheten (IMY) with complaints.

Integritetsskyddsmyndigheten Box 8114 SE-104 20 Stockholm, Sweden

For more information on how Solid Insurance processes personal data, see Solid Insurance's website, <u>www.solidab.se</u>

