

## Data protection information from Profion and EPF to protect your data in the area of company pension schemes

Your personal data is collected and used exclusively within the framework of the provisions of data protection law of the European Union and the Federal Republic of Germany. This data protection declaration is intended to inform you how and why we process your personal data in the area of company pension schemes and what rights you are entitled to on the basis of the General Data Protection Regulation (GDPR).

### General information

Personal data is information that relates to a person and on the basis of which a person can be identified indirectly or directly, e.g. B. Name, date of birth or email address. Information that cannot be linked to your identity is not considered personal data.

The term "processing" includes any process or series of processes carried out with or without the help of automated processes in connection with personal data or groups of personal data, such as the collection, recording, organization, ordering, storage, adaptation or Modification, reading, querying, use, disclosure by transmission, distribution or any other form of provision, comparison or linking, restriction, deletion or destruction.

### Purposes and legal basis for the processing?

Your employer grants you an additional company pension through a benefit plan set up through the EPF EuroBetriebsPensionsFonds e.V. (EPF), a congruently reinsured group support fund of Profion GmbH (Profion). In order for you to be able to participate in the benefit plan, we need your personal data and, if applicable, the names of your surviving dependents for the conclusion, processing and administration of a promised survivor's pension.

Your personal data will be processed in accordance with Art. 6 (1) a) GDPR for the purpose of implementing a company pension scheme. Since the processing of your personal data is necessary for the fulfillment of the contract in which you are the insured person, the processing is based on Art. 6 (1) b) GDPR and does not require your consent. The same applies to the processing of operations that are necessary to carry out pre-contractual measures, e.g. B. for inquiries about insurance products or services.

Your employer may be subject to legal obligations for which the processing of personal data is necessary, e.g. for withholding and paying taxes and

statutory duties. In this case, the processing is based on Art. 6 (1) c) GDPR.

If your personal data is processed for a purpose not specified, you will be informed in advance within the framework of the legal provisions.

### Which personal data is processed?

- Personnel number
- First name
- Surname
- Gender
- Birth date
- Entry date
- Pensionable salary
- Job name
- if applicable, amount of deferred compensation
- private address, if applicable
- If applicable, your work email address
- Bank details and social security number, if applicable
- if applicable, personal data of your surviving dependents

### Who is responsible for processing my personal data and who can I contact about this?

EPF and Profion receives the above mentioned data from your employer. Employers and EPF / Profion are each responsible for the data they process. If you have any questions about the processing of your data, you can contact anyone involved. There is a joint responsibility contract between Profion and your employer in accordance with Art. 26 GDPR.

**Broker:** The insurance contracts for company pension schemes are managed by the broker and employee benefits consultant Profion. Your data will be passed on to Profion for advice, conclusion, implementation, documentation and support of the contract.

If you have any questions about the processing of your personal data at Profion, please contact the data protection officer there:

**Profion GmbH**

**Heimeranstrasse 37, 80339 München**

**+49 89 388 372 60**

[datenschutz@profion.de](mailto:datenschutz@profion.de)

**Reinsurer:** The benefits according to the EPF benefit plan are reinsured with insurance companies. Your data will be transmitted to them as far as this is necessary for the fulfillment of the promise from the performance plan.

If you have any questions about the processing of your personal data by the insurers, please contact their data protection officer:

**Zurich Eurolife S.A.**  
**Building Elise, 21 rue Léon Laval,**  
**L-3372 Leudelange, Luxembourg**  
**Telefon +352 26 6421**  
**E-Mail-Adresse: [ZELprivacy@zurich.com](mailto:ZELprivacy@zurich.com)**

**Support Fund:** The benefit plan is implemented through the EPF Benevolent Support Fund. Your personal data will be processed by employees who are responsible for managing the performance plan. The EPF employees process your personal data only to the extent necessary to fulfill contractual and legal obligations and / or tasks. This can be the so-called customer advisor or accounting employee.

If you have any questions about the processing of your personal data at the EPF relief fund, please contact the administrator of the relief fund, Profion, and their data protection officer:

**EPF EuroBetriebsPensionsFonds e.V.**  
**Heimeranstrasse 37, 80339 Munich**  
**+49 89 388 372 60**  
**[datenschutz@profion.de](mailto:datenschutz@profion.de)**

In addition, the EPF relief fund and Profion can forward parts of your personal data to the following institutions:

**External service providers** - e.g. tax consultants, IT, postal and printing service providers

**Public institutions to comply with legal requirements** - e.g. B. health insurances, social security agencies or tax authorities

#### **How long will my personal data be kept?**

Insofar as this is necessary, your personal data will be stored for the duration of your employment and deleted as soon as they are no longer required for the aforementioned purposes. However, due to various legal obligations, there are requirements to store and document personal data beyond the period of employment.

**Will personal data be transferred outside of the EU?**

The entire processing of your personal data takes place in Germany and / or the EU. If, in exceptional cases, a transfer to a country outside the EU or the European Economic Area (EEA) is necessary, this will only be done in compliance with the relevant provisions of Art. 44 ff. GDPR.

#### **Your rights**

In accordance with legal requirements, you have the following rights against all processors of your data:

**The right to information** about the identity of the person responsible for the processing, the reasons for the processing of personal data and other relevant information that is necessary to ensure fair and transparent processing of personal data (Art. 13 and 14 GDPR)

**The right to access** your personal data so that you can enforce your data protection rights (Art. 15 GDPR, Section 34 Federal Data Protection Act in the version of May 25, 2018)

**The right to correct** inaccurate or incomplete data (Art. 16 GDPR)

**The right to erasure** ("right to be forgotten") (Art. 17 GDPR, Section 35 BDSG)

**The right to restrict the processing** and use of your personal data (Art. 18 GDPR)

**The right to data portability** to another person responsible (Art. 20 GDPR)

**The right to lodge a complaint with a supervisory authority** (Art. 77 GDPR, Section 19 BDSG).

If one of the reasons mentioned above applies and you would like to request the deletion of the stored personal data, you can contact us at any time. The data protection officer or your supervisor must immediately ensure that the request for deletion is fulfilled immediately.

**You can refuse to provide or forward your personal data, but without this personal data no insurance can be taken out for you and neither we nor our broker and insurer can fulfill the obligations in connection with the administration of the benefit plan. Your employer will then not be able to fulfill the employment law promise given to you.**

# Data Protection and Professional Secrecy

In accordance with the applicable Luxembourg data protection law (including but not limited to the Luxembourg law of 1 August 2018 organizing the National Commission for data protection and the general system on data protection and the European Regulation no. 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the '**GDPR**') (the '**Data Protection Law**'), Zurich Eurolife S.A. as data controller collects, stores and processes, by electronic or other means, your personal data including but not limited to: title, family name, forename(s), country and place of birth, nationality, date of birth, date of the beginning or ending of the employment, residential address, country/countries of residence, health information if applicable, tax identification number if applicable, email address, telephone number, gender, marital status and employment as well as financial details (the '**Personal Data**').

The lawful basis for the Personal Data processing are (i) your consent for the processing of your health information (where applicable), (ii) the legitimate interests of Zurich Eurolife S.A. and the legitimate interests of the parties benefiting from the policy and (iii) compliance with applicable legal and regulatory obligations relating e.g. to fraud prevention and detection, anti-money laundering rules, tax reporting requirements, economic or financial sanctions laws and the legal and regulatory requirements applicable to insurance companies. In this regard, Personal Data is processed in particular for purposes of:

- a) The subscription, performance, servicing and administration of the policy (including but not limited to provide insurance cover, to pay for a claim or to manage the risk associated to the insurance coverage through reinsurance);
- b) The provision of related assistance services, advice and support;
- c) Underwriting and claim management purposes;
- d) IT services, including but not limited to the provision of IT infrastructure, IT maintenance services, IT security and data analytics, administration of websites, troubleshooting, data analysis, testing, research, statistical and survey purposes;
- e) Preventing and detecting fraud, money laundering or terrorist financing and risks of violating economic or financial sanctions laws on the level of the Zurich Insurance Group Ltd. or any of its affiliated companies, as listed in the most recent annual accounts ('**Zurich Group**');
- f) If necessary, for the establishment, exercise or defense of legal claims;
- g) Where applicable, negotiating a possible sale, transfer or reorganization of our or our Group's business (or any part of it); and
- h) Complying with all applicable legal and regulatory obligations (e.g. to prevent and detect fraud, money laundering or terrorist financing, to comply with tax reporting requirements and economic or financial sanctions laws and to comply with the legal and regulatory requirements applicable to insurance companies).

The 'legitimate interests' refer to the above points a) to g) as well as to benefiting from the policy as regards the parties benefiting from the policy.

The provision of Personal Data, including health data where applicable, by you is required for the performance of the policy. Failure to provide sufficient, accurate and up-to-date information as well as failure to provide consent regarding the processing of your health data, where applicable, may prevent Zurich Eurolife S.A. from providing cover.

Considering our outsourcing and service provider arrangements, covering notably the assistance described above under points a) to h), and the fact that we operate in several jurisdictions in which we may be required to share Personal Data with local authorities, affiliates or other third parties, the Personal Data may be disclosed or transferred to third parties for the above-mentioned purposes. This may, depending on circumstances, include the parties listed below (the '**Recipients**')

- Zurich Group; Companies in the Zurich Group share information with each other in the context of outsourcing and service provider arrangements. Information is shared where it is relevant and appropriate; this includes health information for underwriting and claims purposes or where necessary for IT servicing or security purposes. If you apply for insurance with more than one company in the Zurich Group, they may share your details;
- Involved financial advisers, brokers, agents or other insurance intermediaries;
- Other contractors or service providers who may provide services to us such as administration, information technology, telecommunication, actuarial, data entry, data storage, data recovery, data security, mail distribution, claim assessment and adjudication, payment, investment, check printing, fiscal representation, marketing, emergency assistance services, due diligence screening, auditors, lawyers, medical and professional services as well as survey and research services;
- Credit reference agencies, reinsurers, other insurers and financial institutions;
- On the sale, transfer or reorganization of our or our Group's business (or any part of it) to the acquirer or new organizational unit; and
- Governmental, legal, tax and regulatory authorities, courts, dispute resolution forums (which have jurisdiction over us or our Group companies), investigators or legal process participants and their advisors.

The Recipients are established within the European Union ('**EU**'), the European Economic Area ('**EEA**'), the United Kingdom, the Isle of Man, Switzerland and Hong Kong. Where we transfer Personal Data outside the EU or the EEA, we will ensure that the transfer relies on one of the legitimacy basis set out by the Data Protection Law. We will do this by ensuring that there is either an adequacy decision of the EU Commission regarding the transfer of Personal Data or that the Personal Data is given adequate safeguards by using 'standard contractual clauses' which have been adopted by the EU Commission or, as the case may be, any other legitimacy basis provided for by the Data Protection Law. The Isle of Man and Switzerland benefit from an adequacy decision of the EU Commission. You have a right to request a copy of the 'standard contractual clauses' from the Data Protection Officer of Zurich Eurolife S.A.

The Recipients may, under their own responsibility, disclose the Personal Data to their agents and/or delegates (the '**Sub-Recipients**'), which shall process the Personal Data for the sole purposes of assisting the Recipients in providing their services to Zurich Eurolife S.A. and/or assisting the Recipients in fulfilling their own legal obligations. The Recipients and Sub-Recipients may, as the case may be, process the Personal Data as data processors (when processing the Personal Data on behalf and upon instructions of Zurich Eurolife S.A. and/or the Recipients), or as distinct data controllers (when processing the Personal Data for their own purposes, notably to fulfil their own legal obligations). Where we transfer Personal Data to Recipients acting as data processors, we will ensure that where such Recipients further transfer Personal Data to Sub-Recipients outside the EU or EEA, such transfer relies on one of the legitimacy basis set out in the preceding paragraph.

The Personal Data shall not be kept by Zurich Eurolife S.A. for any period longer than necessary, with respect to the purposes of the data processing, including compliance with applicable statutory retention periods or limitations.

In accordance with the conditions laid down by the Data Protection Law, you have the right to:

- Access your Personal Data;
- Correct your Personal Data where it is inaccurate or incomplete;
- Object to the processing of your Personal Data;
- Ask for erasure of your Personal Data;
- Ask for the restriction of processing of your Personal Data; and
- Ask for Personal Data portability – to obtain personal information in a digital format.

You may exercise your above rights by writing to the Data Protection Officer of Zurich Eurolife S.A. at the following address:

Data Protection Officer  
Zurich Eurolife S.A.  
Building Elise  
21 rue Léon Laval  
L-3372 Leudelange  
Luxembourg  
E-mail: ZELprivacy@zurich.com

You also have the right to lodge a complaint with the Luxembourg National Commission for Data Protection ('**CNPD**') at the following address: 1, Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Luxembourg; or with any competent data protection supervisory authority of your EU or EEA member state of residence.

Zurich Eurolife S.A. is a life insurance company incorporated under the laws of Luxembourg and registered with the Luxembourg register of commerce and companies under no. B51753.

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Zurich Eurolife S.A. is subject to the applicable Luxembourg legislation and falls under the supervision of the Luxembourg insurance regulator, the Commissariat aux Assurances (7, boulevard Joseph II, L-1840 Luxembourg, Luxembourg).

