

Data protection at Swiss Risk & Care

In addition to the Swiss legal provisions in force, governed by the Federal Data Protection Act (LPD), the SRC Group informs you that the General Data Protection Regulation (RGPD) of April 27, 2016, established by the European Commission, is applicable since May 25, 2018 for any company processing personal data of European residents.

The SRC Group naturally makes every effort to ensure the execution of the European provisions, which aim to strengthen the rights of citizens concerning the use of their personal data, subject to their applicability in Switzerland and the provisions defined by the LPD or the regulations authorizing this matter in the lines of business of the Group.

Purposes and legal basis of processing

The data collected is intended to enable the execution of the mandates entrusted by the client. It is also identified that they are intended to participate directly or indirectly in satisfying your requests and allowing the realization of pre-contractual measures, acts of subscription, management, advice, prospecting and subsequent execution of the contract, including profiling. The data can also be considered in studies aimed at measuring the performance, portfolio, or other indicators of the SRC Group.

As such, they may be used for purposes of collection, statistical and actuarial studies, exercise of recourse and management of complaints and disputes, examination, assessment, control and monitoring of risk, and compliance with legal, regulatory and administrative obligations.

This information may also be used for commercial prospecting purposes, including profiling, subject to your consent or your right to object, as well as to enable the fight against insurance fraud.

Processing environment

The SRC Group makes every effort to have an operating platform that meets the expectations of its customers by hosting its data in the Swisscom cloud.

This cloud offers the following guarantees:

- Hosting in Switzerland
- The highest level of security from Swisscom, and one of the highest in Switzerland
- 24/24 - 7/7 support, provided by competent Swisscom security engineers
- A technical team mobilized to respond to and manage attack attempts
- Guaranteed availability (third parties 3 & 4), redundancy on sites separated by 100 km
- A capacity for disaster recovery (HA), on redundant site, without interruption of duty



Swisscom also meets the constraints of the expected arrangements because the ESC cloud is ISO IEC 27001, FINMA & ISAE certified.

Category of data collected

The data collected by SRC generally comes from transfers or processing by the client and its partners, or from the collection of information directly from the owner of the data. These data are classified and established according to the mandate, the line of business and the needs in terms of processing. Main categories of data likely to be collected (non-exhaustive & according to mandate):

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- **Identity data**
Identifiers, name, first name, date of birth, language, AVS number, age, sex, marital status, date / age of marriage, email, etc.
- **Family member data**
Date of birth of the spouse, age of the spouse, date of birth of the children, age of the children, training status of the children, first name of the children, etc.
- **Economic and financial data**
Contract, subscription to services or products, salary, activity rate, date of employment, contributions (AVS, AI, APG, family allowances, UVG accident insurance, loss of earnings in case of sickness, provident insurance), data tax, social benefits (AVS, LAA, LPP), etc.
- **Financial data**
Salary, activity rate, date of employment, contributions (AVS, AI, APG, family allowances, UVG accident insurance, loss of earnings in case of sickness, provident insurance), tax data, social benefits (AVS, LAA, LPP), etc.
- **Company employment data**
Company, title, function, hierarchical level, authorizations, membership of a company group, benefits, etc.
- **Behaviour data**
Set of information that can be collected by modern digital tools (location, navigation on a website, information on connection terminals, date / time of connection, frequency of visits, etc.)
- **Connexion data**
Set of information allowing a natural person or system to connect to an information system (connection account, password, security token, activation key, etc.)
- **Identification data**
Required for processing with external organizations (AVS number, French social security number, registration number of partners or third-party organizations, etc.)

Processing of personal data

The SRC Group and its partners are subject to Swiss legal provisions in this area, in particular to the Swiss Federal Law on Data Protection (LPD), but also, for European residents, to the European General Protection Regulation. Data (GDPR), subject to their applicability and on the basis of your consent or for the purposes of the legitimate interests of the parties.



Location of processing and recipients

The SRC Group strives as much as possible to orchestrate its processing and host its data on platforms in Switzerland.

The SRC Group may, in the context of its processing, call on third parties, such as service providers, partners, subcontractors, etc. As part of these delegations, it is as much as possible required by the Group to ensure continuity of processing and hosting of data in Switzerland, without guarantee or obligation, except by explicit agreement between the parties.

With regard to processing carried out outside the SRC Group by external third parties, particular vigilance is exercised as to the location of the processing operations, their level of security (operational and technical) and the level of protection of personal data in the recipient country.

Data retention period

In general, personal data may be kept for the duration necessary for the performance of the contract with reference to the legal limitation periods, subject to legal and regulatory retention obligations.

It is assumed that the retention period for personal data varies according to the need for this information and the applicable legal bases.

The criteria which make it possible to determine the retention period are in particular the legal framework, the needs of the SRC Group to have access to this information, the achievement of the initial or extended purposes, the protection of overriding private interests, as well as the constraints or dependencies arising from internal organizational or technical processes or elements.

Personal data is kept in any case during the contractual relationship, generally increased by a period corresponding at least to the ordinary limitation periods.

However, these deadlines may be extended, for example in the event of a dispute, legal proceedings or legal or regulatory provisions providing for a longer retention period, or until the end of the mandate is assured and not contested.

Data exchange

The SRC Group assumes that it is authorized to transmit the personal data required for the performance of delegated services to its partners identified for the performance of their missions.

Exercise of rights

In accordance with legal provisions, it is noted that a right of access, rectification, opposition, limitation of processing, and erasure of data is granted to the owner of the data, in the cases where it is applicable and admissible.

As a customer, you can also exercise your rights in relation to your data, provided that this is not prejudicial to a third party and complies with the applicable provisions in terms of data protection or other legal provisions aimed at protecting the owner of the data.

The rights can be exercised with the legal representative of the SRC Group by email at nelzein@swissriskcare.ch.



To do this, it is expected that the identity of the authorized applicant is proven by attaching:

- A copy of the trade register (signatory) for the exercise of the right on behalf of a legal person
- A copy of the identity card or passport of the holder of the request

Each request must indicate precisely what the request consists of and justify the exercise of the right.