

# Privacy Policy

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## Introduction

The Code of Conduct forms the basis for compliance in the Baloise Group and defines the minimum standards for ethically and legally impeccable conduct by all employees. The Baloise Code of Conduct also contains basic rules for data protection aimed at protecting the personality rights of natural persons whose data is processed by Baloise.

The Baloise Group ensures that the data processing activities of the operating Group companies comply with the principles of the applicable data protection legislation. The focus is on the Swiss Data Protection Act (FADP) and the European General Data Protection Regulation (GDPR).

For this reason, Group Compliance has introduced the Group Compliance Controlling Standards and a Group directive. The Group directive contains the requirements in the context of data protection that apply Group-wide to all areas affected by data protection legislation. All affected employees must implement and follow these guidelines. Likewise, other obligations based on local law must be complied with.

## Group Compliance Controlling Standards

The Group Compliance Controlling Standards define the fundamental and most risky compliance topics and the corresponding objectives that must be implemented as a minimum standard by all strategic business units of Baloise. The following standards, adopted by the CEO of the Baloise Group, explain how data protection is implemented at Baloise.

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## Basic rules for data protection at Baloise

### Responsible persons

Each strategic business unit must appoint a data protection officer. Those officers must monitor legal developments, advise management comprehensively on data protection issues and participate in internal reviews and checks. They exercise their function independently and thus have the right to escalate directly to all Baloise units. They also have the necessary expertise. They have access to all relevant personal details, ensure the implementation of locally applicable legal requirements and regulations, are responsible for training the employees concerned and for data protection processes. There is also a Group Data Protection Officer who is responsible for ensuring uniform standards for Baloise, Group-wide projects and regular exchanges between the strategic business units' data protection officers.

### Internal directives and processes

The basic rules of data protection are defined in the Group privacy policy of the Baloise Group. Local data protection directives are also in place to cover special local features.

The privacy policy contains the following, important data protection rules:

- the responsibilities and independent positions of data protection officers;
- the data processing principles, legal bases for data processing and justifications;
- the requirements for conducting data protection impact assessments;
- requirements for the documentation of data processing (e.g. directory of processing activities);
- the behaviour and processes in the event of data protection violations;
- the rules for commissioning order processors and further data recipients;
- the specifications for the processing of requests from data subjects;
- the rules for deleting personal details;
- the references to provisions on data security;
- the basic rules of data protection consent and information; and
- the provisions on data processing abroad.

Group-wide and local processes have also been created to regulate the rights of data subjects (right to information, correction, erasure, and right to data disclosure and transfer) as well as the behaviour in the event of data protection violations.

Baloise operates as well a Group-wide data protection management system, which uses data protection assessments to ensure that all data processing complies with applicable data protection law both before it begins and during its term.

### Training and instruction

Baloise employees receive regular training on data protection regulations and directives and are informed of any changes in the legal situation. Completion of the training courses is compulsory and is documented.

### Controlling and reporting

The compliance reporting process is used to identify and assess compliance risks and key controls of all Compliance Standards, as well as to report on changed regulations, indicators, organisational aspects and key activities. Group Compliance discusses the risk and control assessments and management reports with the strategic business units and prepares an annual summary for the Corporate Executive Committee and the Board of Directors. Based on the interim reports of the strategic business units, Group Compliance also submits an interim compliance report to the Corporate Executive Committee. Compliance reporting enables Group Compliance, the Corporate Executive Committee and the Board of Directors to identify, assess and monitor compliance risks and, if necessary, to take control measures to minimise them.

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