

DATA RECIPIENTS

Information in accordance with Art. 13(1)(e) of Directive (EU) 2016/679 – General Data Protection Regulation (GDPR)

(Status as of: 20 March 2026)

The processing of your personal data is essential for the justification, management, fulfilment and termination of an insurance contract. Due to the high complexity of the insurance industry and the legal framework conditions, it may be necessary for your data to be transmitted to a wide range of recipients. Below you will find more information about the recipients or categories of recipients to whom we may transfer your personal data.

Of course, any transfer will only take place if this is necessary for contractual fulfilment or if there is a legal obligation required to fulfil an overriding legitimate interest on our part or that of a third party, or you have given your consent.

In all these cases, your personal data will only be transmitted or made available to the absolute minimum extent necessary, which means that under no circumstances will all available data be transmitted or made available, but only the data necessary to fulfil the specific purpose.

In this context - depending on the individual case - your personal data may be transmitted to the following third parties in particular:

I. Processors within VIENNA INSURANCE GROUP AG

One of our basic principles lies in either completing essential data processing for our business ourselves or having this performed by specialised companies within our Group in Austria. This refers to the following companies, which, in terms of data protection law, should be regarded as processors as defined in Art. 4 (8) GDPR and with which we have concluded agreements in accordance with Art. 28 GDPR:

twinformatics GmbH, Obere Donaustraße 63, 1020 Vienna

twinformatics GmbH is our IT service provider. The main tasks performed by twinformatics GmbH are the development of software as well as the operation and maintenance of our IT systems. twinformatics GmbH is certified in accordance with ISO 27001:2013, guaranteeing maximum security and data protection. All our data centres are located in Austria.

VIG IT - Digital Solutions GmbH, Schottenring 35, 1010 Wien

As a service provider, VIG IT - Digital Solutions GmbH focuses on IT services tailored to VIG Group companies and is ISO 27001:2013 certified. With twinformatics GmbH as its key sub-service provider, it bears overall responsibility for all VIG solutions provided.

RISK CONSULT Sicherheits- und Risiko-Managementberatung Gesellschaft m.b.H., Deutschmeisterplatz 4, 1010 Wien

RISK CONSULT Sicherheits- und Risiko-Managementberatung Gesellschaft m.b.H. supports us in operational and strategic risk management as well as in the management of claims. In some cases, personal data may be forwarded, particularly in the processing of liability claims.

AQUILA Hausmanagement GmbH, Zelinkagasse 12, 1010 Wien

AQUILA Hausmanagement GmbH provides building services and facility management for some of our Group's office buildings. The company also provides physical security and video surveillance.

II. Processing by specialized service providers outside of VIG

However, due to the complex nature of modern data processing, we also have to use specialized service providers outside our Group for various purposes, and commission them to process your data.

As part of processing outside our Group, our partners are carefully selected by us and are obliged in accordance with the legal provisions of Art. 28 GDPR to handle your data confidentially and to comply with our own data protection standards. In particular, our partners are obliged to process your data only in the context of the provision of their services. Under no circumstances are they permitted to pass on your data to third parties for advertising purposes or to use it commercially themselves. We require our processors to contractually oblige all authorized persons to maintain confidentiality.

These can be the following categories of companies:

- **Scanning and printing service providers**

We use these kinds of companies for the professional scanning of documents and printing of our postal items or customer magazine.

- **Security service providers** within the context of safeguarding building and data security.
- **Tool providers regarding due diligence measures**

In order to comply with sanction law obligations, tool applications are used as part of our due diligence processes (e.g. Lexis Nexis® Bridger Insight® XG).

- **AI service providers to support internal processes**

Certain employees can use AI applications (such as “Harvey”, “DeepL” or “ChatGPT”), which are primarily designed for internal research, process optimization, text creation and translation. However, these AI applications are not used in the context of your insurance relationship, in particular not for the assessment of claims or in connection with the conclusion of contracts. All our employees who are given access to AI applications are trained in the use of this technology and have an appropriate level of AI expertise.

- **Association of Insurance Companies**

The Austrian insurance industry uses the Association of Insurance Companies (“VVO”), Schwarzenbergplatz 7, 1030 Vienna, as a processor under data protection law for the operation of several central services. The following technical services are operated by the VVO and used by the insurance companies as the respective controller under data protection law:

- Co-insurance settlement (in accordance with Section 5(48) of the Austrian Insurance Supervision Act [VAG]) for the purpose of standardized data transfer between insurance companies to implement mutual balance settlement with co-insurance policies.
- Use of the FTAPI SecuTransfer software as hosted software in the VVO data centre for secure and encrypted data exchange in the context of insurance relationships.

III. Data transfer to independent data controllers

Data processing is not the main focus for the following recipients and there is no “processing” within the meaning of data protection law, but the **use of external specialist services** with an independent controller or the required data transfer to an independent controller. We may or must transfer your personal data to the following categories of recipients in certain cases:

- **Insurance intermediaries:** If your insurance relationship with us is concluded through an agent or broker and/or an agent or broker maintains your insurance contract, the insurance intermediary will collect your personal data and transfer to us the data necessary for examining your insurance risk

or fulfilling the respective contract. We will also transfer your personal data to the intermediary to the extent necessary to provide support based on and within the scope of the power of representation granted to the intermediary.

- For claims settlement, it may also be necessary to transfer your data to **other insurance companies involved in an insurance event**.
- **Co-insurers:** Several insurance companies may be involved in insuring the same risk, primarily with the coverage of major risks. In such cases, it may be necessary to transfer your contract and claim data to these companies in accordance with Section 11c(1)(2) VersVG so that the participating insurers can evaluate the assumed risks and ensure the fulfilment of the claims.
- **Reinsurers, retrocessionaires:** Where necessary, we insure the risks we have assumed with special insurance companies (reinsurers). It may therefore be necessary to send your contract and claim data to these companies in accordance with Section 11c(1)(2) VersVG so that the reinsurer can perform an independent assessment of the risk or insurance event.
- In certain cases, we may transfer your personal data to companies contracted with **claims settlement and claims processing**.
- **Participants in claims or insurance events:** Insofar as this is legally covered and absolutely necessary as part of our claims processing or to render a service, we may also transfer your data to participants such as beneficiaries, injuring parties and injured parties in a claim or insurance event, depending on the individual case.
- **Experts**, as far as this is necessary for the assessment of insurance events.
- **Forensics service providers** for the performance of necessary forensic analyses.
- For example, to examine risks or to assess insurance events, we may transfer your personal health data to **health service providers** based on Section 11c VersVG such as doctors and medical institutions or social insurance agencies, as well as authorised experts.
- **Legal and arbitrary representatives:** e.g. adult representatives or persons authorised by power of representation. In such cases, we will only transfer your personal data within the scope of the power of representation.
- **Service providers** for the provision of contractually owed insurance services.
- **Creditors, persons owed through restricted transferability and mortgage creditors** in the event that the insurance contract is safeguarded according to your contractual agreement.
- **Banks and financial institutions** to carry out payment transactions (e.g. for tracking, cancellation or correction of incorrectly made payments).
- **Collection offices and service providers as part of combating fraud** (e.g. detective agencies) for enforcing our legitimate claims.
- **Solicitors** to establish or defend legal claims.
- **Various chambers** such as the Bar Association, the Medical Chamber and Austrian Economic Chamber to communicate the confirmation of insurance for concluding mandatory insurance contracts.
- **Logistics service providers** for the dispatch of postal items.

- **Dispute resolution bodies (interest groups, arbitration bodies):** Your data may be transferred to an out-of-court dispute resolution body based on your (contractual) consent or a legal obligation.

Your personal data may be transferred to the following recipients as the result of a **legal obligation**:

- If there is a **legal or regulatory obligation** for this purpose, your personal data may be transferred to public bodies and institutions (e.g. European insurance regulator, Austrian Financial Market Authority, domestic and foreign financial authorities).
- **Courts and public prosecutor's office:** There might be legal obligations to transfer your personal data to courts and/or the public prosecutor's office, whereby this shall only take place to the minimum extent required and within the legally binding framework.
- **Court commissioner (notary):** As part of the settlement of an estate.
- **Insolvency administrator:** As part of their court-appointed activity.
- **Financial authorities:** In accordance with Section 114 in connection with Section 143 of the Federal Fiscal Code (BAO) or within the scope of state subsidies.
- **Auditor:** As part of the process of drawing up our annual financial statements.
- **Other public authorities and other public sector companies:** Due to legal obligations, we may have to transfer your personal data to recipients other than those explicitly named in this document. In this case, the data shall only be transferred to the minimum extent required and within the legally binding framework.

Data transfer to a third country or to an international organisation

Data shall only be transferred to countries outside the EU or the EEC (known as third countries) if this is required to execute your orders (e.g. payment orders), if this is legally stipulated or if you have consented to this.

At your request, for contracts containing a foreign element or for an insurance event that is abroad or contains a foreign element, data transfer to third countries may be necessary for contractual fulfilment. The transfer may concern the categories of recipients listed for domestic purposes.

In the context of data processing, your data shall not be transferred outside the European Union – apart from in the exceptions specified above.

Adaptation of this information

This information replaces all previous versions. We reserve the right to adapt it if necessary.