

Personal Data Processing – Insured



This document describes how we process your personal data as insured covered by one or several of AFA Insurance's insurance plans.

1. We protect your personal data

AFA Sjukförsäkringsaktiebolag (502033-0642), AFA Trygghetsförsäkringsaktiebolag (516401-8615) and AFA Livförsäkringsaktiebolag (502000-9659) ("AFA Insurance", "we", "us") are joint controllers for the processing of your personal data set forth in this document. Regarding the processing activities related to the purpose of calculating insurance risks, each company within AFA Insurance acts as an independent controller related to respective company's insurance plans.

Regarding the processing of your personal data for which AFA Insurance is responsible, an internal arrangement has been established which describes our roles and responsibilities.

Our objective is to make you feel confident when sharing your personal data with us. We take appropriate technical and organizational measures to protect and to ensure that the processing is performed in compliance with current data protection regulations and with our internal guidelines and procedures.

2. What type of personal data are we processing and why?

• Claim settlement

We process your personal data as part of claim settlement. This includes processing of your personal data to administer and assess your right to compensation, coordinate compensation, investigate claim recovery, as well as in connection with police reports, when defending legal claims, to investigate set-off possibilities, to follow up, plan and to ensure the quality of our claims settlement, as part of our internal communication during insurance matters, for storage purposes in shared IT systems and in order to maintain a high data quality. The processing of your data is necessary in order to fulfil our legitimate interest in assessing the right to compensation, to fulfil our obligations in accordance with the insurance agreement with your employer and to fulfil legal obligations deriving from provisions in collective bargaining agreements.

The main categories of personal data that we process are identity information, contact details, health data as well as information about injuries and other related details. Your personal data will also be further processed for the purposes

of compiling statistics for our internal process and production follow-ups. For more detailed information on the personal data we are collecting about you from other sources than yourself, please see section 3.

We also process your personal data to fulfil legal obligations relating to our claim settlement business, for example when conducting screenings against EU sanctions lists, providing the Swedish Tax Agency with statements of earnings and deductions as well as for internal accounting purposes.

The processing of sensitive categories of personal data relating to you, namely your health data, is necessary in order to establish, exercise and defend legal claims (i.e. to assess your right to compensation). No sensitive categories of data are processed in relation to further processing in process and production follow-ups.

• Calculate insurance risks

We process your personal data in order to calculate insurance risks. This includes processing of your personal data to calculate our insurance provisions, capital requirements and insurance premiums, create reports for the Financial Supervisory Authority as well as for data and calculation model quality assurance.

The processing of your personal data is necessary in order to fulfil our legitimate interest in ensuring that the costs for our insurances are in proportion to the actual insurance risks and to ensure that our business is financially sound, as well as to comply with insurance industry regulations. The main categories of personal data that we process about you are information about your claim and other related details, including health data. For more detailed information about the personal data we are collecting about you from other sources than yourself, please see section 3.

The processing of sensitive categories of data, namely your health data, is necessary in order to establish, exercise and defend legal claims.

• Statistics

We process your anonymized personal data to produce statistics. This includes processing of your personal data to produce statistics for external parties, such as trade unions and employers' organizations, employers and authorities. We also produce statistics reports for internal and external use. The processing of your personal data is necessary in order to fulfil our legitimate interest in providing relevant statistics to various parties.

The processing of sensitive categories of data, namely your health data, is necessary in order to produce relevant statistics and for reasons of public interest to receive statistics that AFA Insurance, on behalf of the labor market parties, provides. Published statistics will not contain data that could identify you as an individual.

- **Research**

Your personal data that we have collected for other purposes may in some cases be further processed for research purposes, for example within the areas of work environment, health and for the insurances offered by AFA Insurance. At the request of researchers, we may disclose personal data as part of a research project. In these cases, data will only be disclosed in anonymized or pseudonymized form. At the request of researchers, we may also process your personal data to carry out selections and send you invitation to participate in surveys conducted by researchers. In these cases, you decide whether or not you want to participate in the research project and we do not disclose any of your personal data directly to the researcher. When personal data is processed for research purposes, we always require that the relevant research project has been ethically approved.

The further processing of your personal data for research purposes is based on the same legal basis as the initial processing activity. To the extent sensitive categories of data are processed, such processing is necessary for research purposes.

- **Prevent injuries**

We process your personal data to prevent future injuries. This includes processing of your personal data to carry out projects to prevent injuries and activities to reduce work-related injuries and ill health, as well as to follow up preventative projects and activities. The processing of your personal data is necessary to fulfil our legitimate interest in carrying out preventative measures in the public interest. The main categories of personal data being processed are identity data as well as information about injuries and other claim-related details. For more detailed information about the personal data we are collecting about you from other sources than yourself, please see section 3.

We will further process your personal data to produce statistics for projects to prevent injuries and activities to reduce work-related injuries and ill health, provided that such further processing is compatible with the initial purpose for which we collected your personal data. Published statistics will not contain any data that could identify you as an individual.

The processing of sensitive categories of data relating to you, namely regarding your health data, is necessary in order to produce relevant statistics and for reasons of public interest to receive statistics that AFA Insurance compiles regarding projects and activities.

- **Customer surveys**

We process your personal data to carry out customer surveys. This includes processing of your personal data to improve our communication, service levels and process experience, as well as to develop the business regarding expectations on AFA Insurance (e.g. work on sustainability), desired service level and to review the need of new insurance products through questionnaires and telephone surveys. The processing of your personal data is necessary to fulfil our legitimate interest in following up on your experience of our service and handling of insurance claims. The main categories of personal data being processed are your identity information and contact details. For more detailed information about the personal data we are collecting about you from other sources than yourself, please see section 3.

Eventual sensitive categories of personal data will only be processed with your explicit consent, which will be collected in connection with the customer survey being carried out. It is always voluntary to participate in a customer survey.

- **Improve, test and develop the business**

We process your personal data to improve, test and develop our business. This includes processing of your personal data to carry out functional and performance tests in systems, system and acceptance testing, system and service development and trouble shooting. The processing of your personal data is necessary to fulfil our legitimate interest in developing and improve IT systems and our business. For more detailed information about the personal data we are collecting about you from other sources than yourself, please see section 3.

- **Compliance with obligations under applicable data protection laws**

We process your personal data to fulfil obligations under applicable data protection laws. This includes the processing of personal data to ensure that your personal data from time to time is up-to-date and accurate, to protect your rights under applicable data protection laws and to take actions to prevent data breaches. The processing of your personal data is necessary for us to fulfil our legal obligations pursuant applicable data protection laws. For more detailed information about the personal data we are collecting about you from other sources than yourself, please see section 3.

3. From where do we collect your personal data?

- From yourself**

We collect personal data from you when you are submitting your data as part of initiating a claim on our website, from physical forms, submitting forms or through phone calls. The personal data that we process about you will vary depending on the filed insurance claim. Below you will find examples of what personal data that you need to submit. When collecting your personal data, we will state if the information to provide is mandatory or not. Should it be mandatory, but you have not submitted such information, we might not be able to handle your claim or the claim might be kept on hold until the relevant data has been submitted.

Categories of personal data	Examples of personal data that we collect from you
Identity information	Name and personal identity number or coordination number
Contact details	Phone number, e-mail address, postal address
Health data	Copies of medical records or disability certificates, medical reports, health care power of attorney, diagnosis code
Criminal records	Copies of police reports and decisions from authorities or judicial decisions
Financial information	Income, bank account information
Employment data	Professional title, time of employment, ownership details (if owner of company), contact details of employer, trade union membership

- Your employer**

Your employer may, on your behalf, complement and verify your registration with your employment data or by submitting an employers' report for our group health- or parental leave insurances with your personal data.

Which insurance are you applying for	Confirm employment	Employer registration	Your personal data collected from your employer	Purpose of collection
Group sickness insurance (AGS)	X	X	Employment data, identity data, financial information, health data	We collect and process your personal data for the purposes set out in section 2.
Group sickness insurance (AGS-KL)	X		Employment data	
Work injury insurance (TFA/TFA-KL)	X		Employment data	
Group life insurance (TGL)	X		Employment data	
Supplementary parental benefit insurance (FPT)	X	X	Employment data, identity data, financial information, date of birth or adoption	
Redundancy payment insurance (AGB)	X		Employment data	
Waiver of fee insurance	X		Employment data	
Waiver of premium insurance	X		Employment data	

- Other sources**

In addition to the personal data that you and your employer will provide, please see below the personal data which we may collect about you from other sources.

Source	Which personal data do we collect about you?	Purpose of the collection
SPAR	Population register data	We collect and process your personal data for the purposes set out in section 2.
Other insurance companies	Injuries and related information	
Försäkringskassan	Financial information and health data	
Fora	Employment data, financial information, injuries and related information	
Business and credit reference companies	Employment data, company information and financial information	

4. Transferring and sharing personal data

Where necessary, we transfer or share your personal data with the following categories of recipients.

- **Insurance companies within AFA Insurance**

AFA Insurance operates its business as part of one organization. Thus, we share your personal data, where necessary, with the insurance companies within AFA Insurance for the purposes set out in Section 2.

- **Other insurance companies**

In order to investigate complicated insurance cases, insurance liabilities, recourse claims or for coordination purposes when handling your claim, we may, where necessary, share data about your personal identity number and date of injury with other insurance companies. The sharing of your personal data is necessary to fulfil our legitimate interest in establishing, exercising and defending legal claims. We may also share your health data, such as copies of disability certificates, journals or medical reports upon request by other insurance companies. For such requests, AFA Insurance requires that the insurance company presents a valid power of attorney.

- **Your employer**

We share your personal identity number with your employer to confirm your employment.

- **Skatteverket**

We share your statements of earnings and deductions with Skatteverket as part of settling your claim.

- **Försäkringskassan**

We share your data with Försäkringskassan, for example your personal identity number or your monthly allowance from AFA Insurance, in order to complement and verify the information you have submitted, for example sick leave days or to allow for Försäkringskassan to coordinate benefit allowances.

- **Fora**

We share your data with Fora, which carries out various administrative services on our behalf. If you are covered by any of our insurances, we will also collect your employment data from Fora.

- **Statistiska centralbyrån/Socialstyrelsen**

We may share your personal data with Statistiska Centralbyrån/Socialstyrelsen for pseudonymization purposes prior to disclosing such data to research projects.

- **Banks**

We share your personal data with the bank that AFA Insurance uses, in order to submit payments of insurance claims after assessing that you are entitled to compensation with regards to any of our insurances.

- **Service providers**

In order to fulfil the above stated purposes of data processing we may use service providers that process personal data on our behalf. These service providers are only permitted to process your personal data in accordance with our explicit instructions and are not permitted to use your data for their own purposes. They also are legally and contractually obligated to take appropriate technical and organizational security measures in order to protect your data.

- The categories of service providers with whom we may share your personal data are doctors who for example issue medical reports in injury matters, suppliers of additional services applicable to some of our insurances, companies improving our claims settlement in relation to you as insured (by providing training for our employees) as well as IT suppliers for archiving purposes.

- **Valcentral**

We share your personal data with companies that mediate pension contributions to the occupational pension insurance applicable to you as an employee.

- **Other recipients**

In certain circumstances, we may also need to share personal data with other recipients for purposes such as compliance with applicable laws and regulations, at request or injunction by a competent court or authority as well as (where necessary) to have your insurance claim tried and to fulfil our legitimate interest in establishing, exercising and defending legal claims.

Moreover, we may share your personal data with potential buyers in connection with a merger or an acquisition to fulfil our legitimate interest in carrying out the relevant transaction.

5. For how long is my personal data retained?

The retention period for your personal data will vary depending on the processing purpose	
Claim settlement	To ensure your right to re-assessment and the quality of our data, as well as to fulfil assignments within relevant areas for AFA Insurance, we will store your personal data until further notice.
Calculate insurance risks	
Produce statistics to third parties	
Research	Personal data that is processed for sending out letters with requests to participate in surveys carried out by researchers will be deleted when the research study has ended.
Prevent future injuries	
Customer surveys	The personal data will be deleted when the customer survey is completed.
Fulfil legal obligations	Accounting material will be saved for a period of seven years from the end of the calendar year to which the relevant accounting year ended.
	Legal documents, such as power of attorneys and beneficiary clauses, will be stored until further notice.
	Annuities will be stored until further notice since payments are made continuously and since next of kin may be entitled to reimbursement.

6. Your rights

Pursuant to applicable data protection laws you have the following rights.

- **Request access (data subject access request)**
You have the right to receive confirmation from us that we process your personal data and, in such case, request access to the personal data that we hold about you, known as a data subject access request.
- **Request correction**
You have the right to request correction of any personal data that we hold about you that you consider to be incomplete or inaccurate.
- **Withdraw your consent**
You have the right to withdraw your consent at any time where we are relying on consent to process your personal data. You can withdraw your consent by contacting us via the contact details below.
- **Object to processing of your personal data based on our legitimate interest**
You have the right to object to processing that is based on our legitimate interest for reasons that arise from your specific situation. However, we may continue to process your data, despite your objection to the processing, if we have compelling legitimate reasons to process the data which override your interests.

- **Request deletion**

In certain circumstances, you have the right to have your personal data deleted, e.g. if the lawful basis for the processing is consent and you withdraw it. However, the right to deletion does not apply if retention of the data is necessary to comply with a legal obligation.

- **Request restriction**

In certain circumstances, you have the right to request that the processing of your personal data is restricted. However, if you request restriction of the processing of your personal data, we may be unable to fulfil our obligations to you while the restriction is in place.

- **Data portability**

You have the right to receive a copy of your personal data in a structured format (data portability). Unlike the right of access, the right to data portability only applies to data that you have provided to us and where our lawful basis for the processing is, for example, your consent.

- **Right to make a complaint**

You have the right to make a complaint to the supervisory authority about the processing of your personal data.

Please visit <https://www.afaforsakring.se/dina-rattigheter> to read more about your rights and how to exercise them.

7. Who should I contact if I have questions?

You are welcome to contact us if you have any questions about the processing of your personal data. You may also contact our data protection officer. Contact details are provided below.

Contact details for the data controllers

Postal address: Dataskyddsfunktionen, 106 27 Stockholm
E-mail: personuppgiftshantering@afaforsakring.se
Phone: +46 (0)8-696 49 39

Contact details for the data protection officer

E-mail: ombudsmannen@afaforsakring.se