

Privacy notification – SOS International (Travelcare)

1 PROCESSING OF PERSONAL DATA

SOS International (“SOS”) collects and processes personal data about you, when we handle your cases and requests. The purpose of the processing of information about you, is to deliver assistance services to you under your travel insurance in connection with treatment abroad, home transportation etc. We are acting as the controller when we process your personal data in relation to handling the assistance case.

If you have questions regarding the processing of personal data related to your insurance, please contact your insurance company.

2 WHAT INFORMATION ABOUT YOU DO WE USE?

SOS processes information about you which we receive from you, or from another person who reports the case on your behalf, in connection with the assistance case. We also collect and disclose information to and from authorities and co-operation partners in our supplier network or with whom we cooperate, i.e. public registers and suppliers such as the national identification number register, hospitals, general practitioner and other healthcare professionals, transportation companies and other cooperation partners in our supplier network. We exchange insurance information with your insurance company to the extent that it is necessary to handle your case. In addition, we can disclose information about you to other authorities if there is a legal basis to it.

The information we collect and process in each assistance case may vary, but it will be regular personal data, national identification numbers and sensitive personal data, including mainly:

- (i) Contact details including name, address, telephone number, e-mail address and contact details about relatives and co-travelers
- (ii) National identification numbers
- (iii) Insurance details
- (iv) Travel information
- (v) Health information, e.g. injury or illness
- (vi) Trade union membership
- (vii) Racial or ethnic origin
- (viii) Political opinions, religious or philosophical beliefs
- (ix) Sex life or sexual orientation
- (x) Information regarding expenses related to your case
- (xi) Relevant information about the assistance case
- (xii) Information transmitted from your mobile device when you use the SOS Travel app. This may include information about geographical location, etc.

See also section 7 about recording of phone conversations below.

3 HOW WILL WE USE THE INFORMATION ABOUT YOU?

The purpose of processing information about you is to:

- (i) Handle your case in our alarm centre in order to decide on assistance, including ordering and delivering assistance services by SOS and SOS' supplier network
- (ii) Document agreements between yourself and SOS
- (iii) Carry out medical assessments and monitoring your treatment abroad
- (iv) Collect medical information from your general practitioner, hospital and other healthcare professionals in your home country and/or abroad, relevant for your assistance and/or insurance case
- (v) Apply for a temporary European Health Insurance Card (EHIC) on your behalf
- (vi) Conduct quality assurance, invoicing and accounting
- (vii) Conduct cost control in relation to invoicing in your case
- (viii) Deliver statistics and other reporting
- (ix) Handle complaints regarding SOS' assistance and health services
- (x) Secure the quality of our delivered services
- (xi) Handle authorities' requests for information regarding your case

4 LEGAL BASIS

When SOS receives, and handle your case, we process information about you on the basis of the General Data Protection Regulation art. 6(1)(a), (b), (c), (d) and (f) and art. 87. The processing of sensitive information is processed on the basis of the General Data Protection Regulation art. 9(2)(a), (c), (f), (h) and (i), depending on the character of the delivered service. SOS' legitimate interests justifying the treatment pursuant to art. 6 (1)(f) is in particular to be able to handle complaints, take care of our financial interests and quality assurance.

Regarding the transfer of personal data to countries outside the EU/EEA, where the European Commission has not decided that the country ensure an adequate level of data protection, the transfer is conducted based on standard data protection clauses adopted by the European Commission and/or based on your consent and/or for the performance of a contract, art. 49(1)(a) and (b).

5 TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

If you are or have been present in a country outside the EU/EEA in connection with your assistance case, SOS may exchange information with suppliers and other parties in that country if it is permitted under data protection legislation and given that all relevant conditions are fulfilled. SOS will only exchange such information if that it is necessary for handling your case.

These countries might have different rules regarding data protection than in the EU/EEA.

When transfers are conducted based on the European Commission's standard contractual clauses, the transfers are appropriately safeguarded as described here:

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en.

6 HOW LONG DO WE PROCES YOUR INFORMATION?

We process information about you for as long as necessary in order to achieve the purpose for which it was collected. We do not store the personal data in a manner, which enables identification, for a period which is longer than necessary for the purpose for which the personal data is legitimately processed.

7 ESPECIALLY REGARDING RECORDING OF PHONE CONVERSATIONS

SOS records phone conversations with the purpose of securing the quality of our work and for training purposes. The recording is based on a legal basis in GDPR art. 6 (1) (a) and art. 9 (2) (a).

We are data controllers for the recording of phone conversations between you and SOS.

The recording can in some cases be submitted to your insurance company or to other third parties (e.g. public authorities), if SOS is legally entitled or obliged hereto.

The recordings are saved, as long as they are necessary for the purpose for which they are collected. As a main rule they are saved in 3 months.

You have the right to withdraw a consent that you have given for recording of a phone conversation. If you withdraw your consent, this will only concern our future processing of your personal information. If you wish to withdraw your consent you can contact SOS via our website <https://www.sos.eu/en/for-you/self-service/#access-to-personal-data>

See sections 8 and 9 below regarding your rights in connection with voice recording.

8 HOW DO WE PROTECT INFORMATION ABOUT YOU?

SOS International is ISO-certified. SOS values quality and information security and thereby we ensure the protection of your personal data. This is underlined by our certifications, such as ISO-27001 (information security) and ISO-27701 (privacy).

We use technical and organisational security measures to protect your personal data against unlawful loss, alteration, destruction or access by unauthorised persons and to ensure lawful processing. Our security procedures are regularly revised on the basis of developments in technology.

9 YOUR RIGHTS

You are not obligated to share your information with SOS. If you choose not provide us with information that are necessary for us to handle your assistance case, this may affect our ability to provide you with the requested services.

If you have given your consent to processing your personal information in connection with your case at SOS, you have the right to withdraw your consent. If you withdraw your consent, this will only concern our future processing of your personal information. After withdrawal of your consent, SOS will terminate to process your personal information based on your consent as soon as possible. However, this does not apply if SOS is required to process your information for other reasons or according to law.

Under data protection legislation, you have the right to get access to, receive information about and object to the processing of information about you. Upon request, you also have the right to have information about you rectified, erased or restricted if the information is wrong, misleading or unlawfully processed. In addition, you have the right to data portability.

If you wish to make use of your rights you can contact SOS via our webpage, <https://www.sos.eu/en/for-you/self-service/#access-to-personal-data>

You can lodge a complaint about our processing of information about you by contacting the Danish Data Protection Agency or the national Data Protection Agency in the Nordic countries in which SOS operates. You can find Danish Data Protection Agency's contact information here: www.datatilsynet.dk

SOS has a Data Protection Officer, who can be contacted on the following email address: dataprotectionofficer@sos.eu

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