

## Privacy Policy – Omocom Försäkring AB

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This Privacy Policy explains how we (Omocom Försäkring AB) collect, use, and protect your personal data when issuing insurances to policyholders.

### 1. What is personal data and what is processing of personal data?

According to the EU Data Protection Regulation (commonly referred to as the GDPR), personal data is any information that directly or indirectly identifies an individual. Also pseudonymized data and different kinds of electronic identifiers (such as IP-addresses) are personal data in case they can be connected to an individual.

Processing of personal data is anything that happens to or with the personal data. Any measure taken with the personal data is considered processing, regardless of if it is automated or not. Example of common processing is collecting, storing, adaptation, disclosure, sharing or erasing.

The individuals whose personal data is processed is defined as “data subjects” under the GDPR.

Omocom processes policyholder's names, username and user-id on the platform, address and telephone number. Insurance information such as insurance number and insurance object and address information relating to the object (for example pick-up address and possible destination). Social security numbers are only collected if a customer initiates an insurance claim for damages. Pictures of damaged goods or similar can then be collected. Bank account number is collected if payment for compensation shall be made. Transaction number and the size of the compensation amount is collected by the payment solution provider used by Omocom and is communicated to Omocom.

### 2. Who is responsible for the personal data we collect?

Omocom Försäkring AB, reg. no 559097-2377, Birkagatan 1, 113 36 Stockholm, is the controller for the processing of personal data when issuing insurances to policyholders and handling claims as set out in this notice.

### 3. From what sources do we collect your personal data?

The sources from which we collect data are the following:

- a) Connected platforms: The personal data that Omocom processes is to a large extent information collected from the platforms providing the service that the policyholders wish to ensure through Omocom. The information about policyholders and carriers (and any other users on connected platforms relevant for the insurance contract) (sk. “users”) are only shared with Omocom if a potential policyholder applies for an insurance.
- b) You as a policyholder: some additional information is collected directly from the policyholder

for the purpose of Omocom's issuance of insurance or assessment of insurance claims and payment of compensation based on the insurance.

It is necessary to provide such personal data for the policyholder to be able to sign an insurance with Omocom. If necessary personal data is not provided, an insurance cannot be issued.

#### **4. How do we process your personal data and why?**

##### **Policyholders**

###### **Purpose**

To be able to issue and administer the insurance, calculate risk and assess and pay potential insurance compensation we process your personal data. Personal data is also used on aggregate level to analyze Omocom's business, for example to create statistics of reported claims.

Omocom does not use the policyholder's personal data for marketing purposes and does not share personal data to third parties for such purposes.

Processing conducted:

- a) Issue and administer insurance, the legal basis for this processing is performance of the insurance contract in which the data subject is a party and processing that necessary for compliance with a legal obligation to which we as an insurance company are subject to;
- b) Calculate individual premium, by using so called profiling in the form of an automated assessment of known ratings for the relevant email address on all connected platforms where transactions/ratings occur. The legal basis for this processing is legitimate interest. The core of Omocom's service is to calculate risk on an individual basis to establish the premium. The individual calculation is intended to have an advantage for the policyholder.
- c) Omocom processes pseudonymized and aggregated data about previous claims from its policyholders to create statistics and analyse its business. The legal basis for this is compliance with a legal obligation to which we as an insurance company are subject to and a legitimate interest. The insights gained are the foundation for the individual premium calculation mentioned in section b.

The personal data used to calculate the premium is the user's email address and potential rating on the relevant platform, and any claims history according to the above. No personal data of integrity sensitive nature is processed and no data that can directly identify a person. When the calculation is complete, Omocom will process the result (so called premium value). Omocom's assessment is that the interest of being able to calculate the individual premium for the policyholder and to limit the risk of fraud, weighs heavier than the policyholders' interests of not having its personal processed for these purposes. Omocom has therefore concluded that it has a so called 'legitimate interest' under the GDPR to process the result from the calculation of the premium (so called premium value).

- a) Assess insurance claims and administer payment in case of damages, the legal basis for this

processing is performance of the insurance contract in which the data subject is a party and processing is necessary for compliance with a legal obligation to which we as an insurance company are subject to. In some cases Omocom have contact with other carriers or other users in connection with claims adjustment, for the purpose of verifying the asserted course of events leading up to the damage

- b) Customer services, the legal basis varies depending on the questions from performance of the insurance contract in which the data subject is a party, to processing is necessary for compliance with a legal obligation to which the we as an insurance company are subject to and legitimate interest.

#### **Storage period**

Personal data is stored until the insurance contract has been completed and during a period thereafter to be able to manage any insurance claims based on the contract and in accordance with applicable insurance legislation. Insurance information may be stored up to ten years with the support of the statue of limitations. Information about payment for compensation may be stored up to eight years in accordance with the requirements of the bookkeeping act. If an insurance agreement is never entered, we store the personal information for 6 months.

#### **5. Omocom in social media**

Omocom is responsible for the processing of personal data that occurs on such pages on social media which Omocom controls. We usually obtain consent if we publish personal data in news on social media. The posts made on Omocom's social media by other parties are moderated and handled in accordance with the rules of the Swedish Act (1998:112) on Responsibility for Electronic Bulletin Boards.

#### **6. With whom may we share your personal data?**

##### **Data processors**

In cases where it is necessary for Omocom to be able to offer its services, certain personal data is shared with companies that are so-called data processors. A data processor is a company which processes information on our behalf and according to our instructions. Omocom has data processors assisting with:

- a) IT services - Companies that manage the necessary operations, technical support and maintenance of our IT solutions.
- b) Claims settlement - Companies hired by Omocom to evaluate and administer any requests for insurance compensation from policyholders.

Omocom verifies all data processors to ensure that they can provide adequate guarantees regarding the security and confidentiality of personal data. There are written agreements with all data processors through which they guarantee the security of the personal data being processed and undertake to comply with the applicable data protection legislation as well as Omocom's security

requirements and instructions in general.

### **Organizations that are independent data controllers**

We also share your personal data with certain companies or other organizations that are independently responsible for personal data. The fact that an organization is independently responsible for personal data means that Omocom does not control how the information provided to such organisations is to be processed. Independent data controllers with whom we may share your personal data are:

- a) Payment solutions - Companies hired by Omocom to practically enable the payment of any insurance compensation to policyholders.
- b) State authorities (the police, the Swedish Tax Agency or other authorities) if we are obliged to do so by law or on suspicion of crime.
- c) Debt collection companies, if required to establish, assert and defend legal claims.
- d) Companies in identity analysis and anti-fraud, if relevant for assessing individual premiums for policyholders.
- e) The joint claims register (Sw. "skadeanmälningsregister" (below the "GSR")) for the insurance industry. This register contains certain information about the damage as well as information about who requested compensation and is only used in connection with claims settlement. This means that the company finds out if you have previously reported any damage to another insurance company or authority that handles similar compensation claims. The purpose of the GSR is to provide insurance companies and authorities handling similar compensation claims with a basis for identifying unclear insurance cases and compensation claims. In this way, companies and authorities can counteract the payment of compensation based on incorrect information as well as incorrect payment from several insurances for the same damage. The data can also be used in deidentified form for statistical purposes.

The data controller for GSR is Skadeanmälningsregister (GSR) AB, Box 24171, 104 51 Stockholm. Please refer to [www.gsr.se](http://www.gsr.se) for more information about the processing of information that appears in the register.

- f) Other insurance companies, when assessing a claim, for the purpose of verifying the asserted course of events leading up to the damage.

When your personal data is shared with an organization that is independently responsible for personal data, your personal data is processed in accordance with that organization's privacy policy and personal data management.

## **7. Where do we process your personal data?**

Omocom processes your personal data within EU/EES.

## **8. What rights do you have?**

## **Right of access (so-called register extract)**

Omocom always strives for transparency in how we process your personal data. See section 4 above for a list of the categories of personal data that Omocom processes. If you wish to receive an extract of the specific personal data that is processed about you, you have the right to request access to the data within 30 days via a so-called register extract. Keep in mind that if we receive a request for access to data, we may ask for additional information to ensure efficient handling of your request and that the information is provided to the right person.

## **Right to erasure**

According to the GDPR, you can request deletion of your personal data in certain situations. Regarding Omocom's personal data processing, the following situations may be relevant:

- a) The information is no longer necessary for the purposes for which it was collected or processed
- b) You object to the assessment we have made in relation to our legitimate interests, and your reason for objection outweighs our legitimate interest
- c) The personal data is processed in an illegal way
- d) The personal data must be deleted to fulfil a legal obligation that we are subject to

Keep in mind that Omocom has the right to deny your request if there are legal obligations preventing us from immediately deleting certain personal data, such as if the data needs to be saved in accordance with accounting legislation. The processing may also be necessary for us in order to establish, assert or defend legal claims.

## **Right to rectification**

According to the GDPR, you have the right to have your personal data corrected without undue delay if it's not accurate.

## **Right to restriction of processing**

According to the data protection regulation, you have the right to, under certain conditions, demand a restriction of certain processing of your personal data. This can be done if you have objected to a balance of interests set out above and are waiting for Omocom to check whether the company's legitimate interests outweigh your interests in having the information deleted. However, this may affect Omocom's ability to meet certain obligations towards you during such time when the processing is limited. If the processing has been restricted as described above, Omocom may only, in addition to the actual storage of data, process the data to establish, assert or defend legal claims, to protect someone else's rights or if you have given your consent to continued processing.

## **Right to data portability**

According to the data protection regulation, you have the right to obtain any personal data

concerning you and which you have provided to Omocom, in a structured, commonly used and machine-readable format. You shall have the right to transfer such data to another controller.

### **Right to object**

According to the data protection regulation, you have the right to object to the processing of personal data (incl. profiling) which is based on a balance of interests/legitimate interest. In the event of an objection, Omocom may no longer process the personal data unless we can show that we have significant legitimate reasons for the processing that outweigh your interests, rights and freedoms or if the processing takes place for the determination, exercise or defence of legal claims.

### **9. The protection for your personal data**

Omocom takes necessary measures from both a technical and organizational perspective required to protect the confidentiality, integrity and access to personal data. Only those persons who actually need to process your personal data in order for us to fulfil our stated purposes have access to them.

### **10. The Swedish Authority for Privacy Protection as supervisory authority**

The Swedish Authority for Privacy Protection is the responsible supervisory authority and thus monitors the application of the data protection legislation. If you believe that Omocom or another company is processing personal data incorrectly, you may submit a complaint to the Swedish Authority for Privacy Protection. You can find more information on the website of the Swedish Authority for Privacy Protection ("IMY") ([www.imy.se](http://www.imy.se)).

### **11. How do you contact us with questions on personal data in the easiest way?**

As Omocom takes the protection of your personal data and rights very seriously, a data protection officer has been appointed; Helene Holm (lawyer at Advokat Holm). If you have further questions about your rights, how you can make use of your rights or regarding how Omocom processes personal data, you can reach the data protection officer through [hello@omocom.insurance](mailto:hello@omocom.insurance).

Changes may be made to this information text. The latest version of the text is always available on the website of Omocom. If an update is performed that is crucial to our processing of personal data (for example, change of the stated purposes for the processing of personal data) or updates we deem may be crucial to you, you will receive information about this on the website of Omocom before the update comes into force. In these cases, we will explain as much as possible of the meaning of the update and how they may affect you.

### **12. What are cookies and how does Omocom use these?**

Cookies are small text files consisting of letters and numbers sent from our web server and stored on your browser or device. At Omocom.se we use the following cookies:

- a) Third-party cookies (set by a third-party's website. These are used by us primarily for analyses, e.g. Google Analytics.).
- b) The types of cookies set out above may be of the following kinds:

- Session cookies (a temporary cookie that expires when you close your browser or device)
- Permanent cookies (cookies remaining on your computer until you delete them or they expire)

In addition to this, we may also use

- c) Similar technologies (technologies storing information in your browser or in your device in a way that is similar to cookies).

### **13. How to control the use of cookies**

You have the possibility to control the use and scope of cookies by changing the settings in your browser or device. For example, you may choose to block all forms of cookies, to only allow first-party cookies or elect that cookies are deleted when you close the browser window. Keep in mind that some of our services may not work if you block or delete cookies. You can read more about cookies in general on the website of the Swedish Post and Telecom Authority (PTS), ([www.pts.se](http://www.pts.se)).

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