



Regulations for automated processing by Groupe Mutuel

Martigny, May 2025

Version 2.1

To facilitate the reading of these regulations, all references to people or roles using masculine grammatical gender refer equally to individuals of any gender.

References to “Groupe Mutuel” refer, unless otherwise indicated, the companies within Groupe Mutuel or administered by it.

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1. General provisions

1.1. Basis of these regulations

As part of its activities, Groupe Mutuel (as defined in paragraph 1.2 below) processes personal data within the meaning of the Law on Data Protection (LPD/DSG), both as a federal body in the fields of the Law on Health Insurance (LAMal/KVG), the Law on Accident Insurance (LAA/UVG) and the Law on Occupational Retirement, Survivors' and Disability Pension Plans (LPP/BVG), and as a private legal entity under the Law on Insurance Contracts (LCA/VVG).

The purpose of these processing regulations is to explain in a transparent manner how personal data is processed within Groupe Mutuel.

1.2. Companies subject to these regulations

“Groupe Mutuel” includes the following companies operating in the field of social and private insurance:

- Fondation Groupe Mutuel
- Groupe Mutuel Holding SA
- Groupe Mutuel Services SA
- Groupe Mutuel Assurances GMA SA
- Groupe Mutuel Vie GMV SA
- AMB Assurances SA
- Avenir Assurance Maladie SA
- Mutuel Assurance Maladie SA
- Philos Assurance Maladie SA
- Other companies benefiting from the services of Groupe Mutuel Services SA

1.3. Data controller

As the data controller, Groupe Mutuel assumes responsibility for data protection and security and implements an appropriate organisation based on the risks involved. Groupe Mutuel's Executive Board is supported by a Data Protection Officer (DPO) in matters relating to the protection of personal data and by a Chief Information Security Officer (CISO) for defining a data security strategy.

1.4. Contact

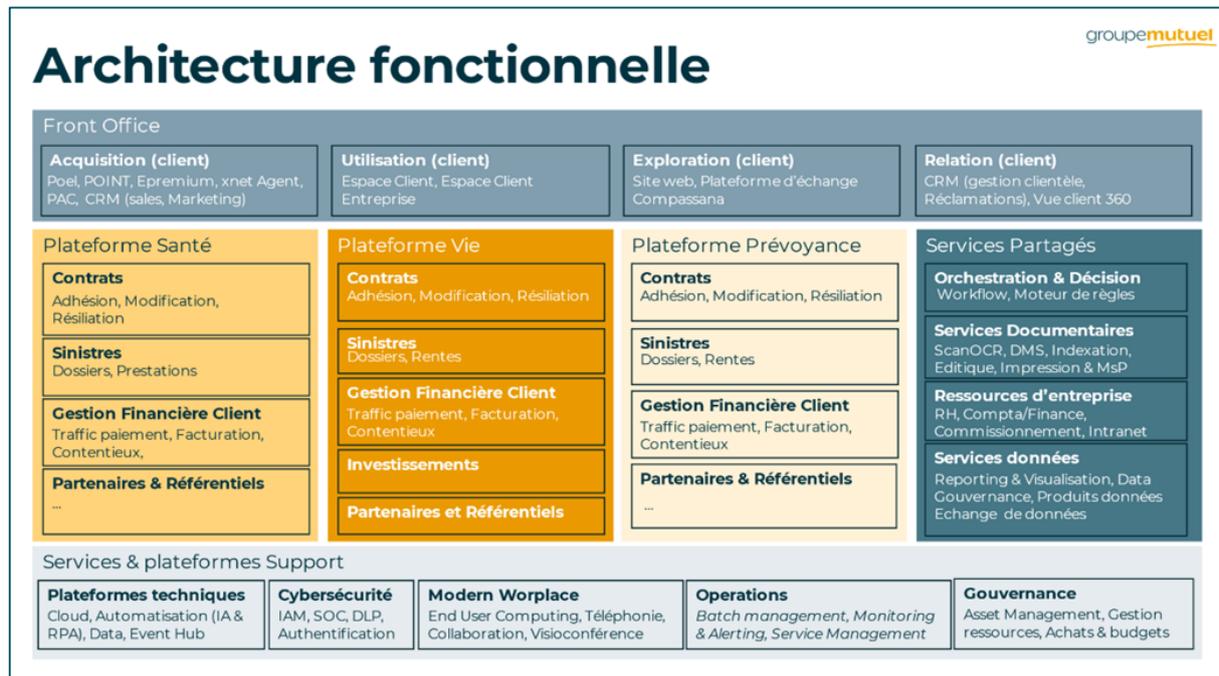
Any questions relating to Groupe Mutuel's personal data protection can be sent to the following email address: dataprotection@groupemutuel.ch

or by post to:

Groupe Mutuel
Data Protection Officer
Rue des Cèdres 5
P.O. Box
1919 Martigny

2. Organisation of the information system

2.1. Functional architecture



2.2. Access authorisations

The following are authorised to access Groupe Mutuel's IT systems: its employees, within the scope of their job functions, as well as its agents and sub-contracted service providers, within the scope of their duties.

2.3. Interfaces

Several interfaces enable direct contact with external service providers and suppliers, for example, for receiving invoices for services or insurance products using telemedicine services.

There is also an interface that allows certain service providers to access insured persons' insurance coverage online.

When using these interfaces, data is transmitted electronically. Measures are in place to ensure data protection and security: authentication systems, encryption, secure data transmission technologies, etc.

3. Data processing

3.1. Purposes & objectives

Groupe Mutuel processes personal data primarily to establish and manage contractual relationships, including to provide insurance services to its clients, prepare related documentation, review policyholder documents, process and verify benefits and payments, conduct research projects or statistical analyses, and improve its products and services.

3.2. Data concerned

The categories of personal data processed are: identification and communication data, data relating to contracts, payment of benefits, disputes, premiums, product marketing and partner data.

The following is a non-exhaustive list of data processed by Groupe Mutuel:

- surname, first name, address, telephone number;
- date of birth and gender;
- nationality and language;
- family relationships and representatives;
- bank details;
- cantonal and/or communal affiliation;
- insurance number;
- social insurance number;
- contractual data;
- type of insurance and cover;
- premiums and premium payments;
- subsidies;
- date of entry and exit;
- health data;
- benefits and contributions to costs;
- healthcare providers;
- reminder data;
- social assistance measures;
- ...

3.3. Source of data

The personal data of our insured persons and partners comes mainly from them and from individuals and authorities authorised to provide data in accordance with legal and regulatory provisions.

3.4. Disclosure of data to third parties

The personal data of our insured persons and partners is only disclosed to third parties under the conditions laid down by law.

3.5. Transfer of data abroad

Data may be transferred abroad, in particular for the processing of claims abroad or for other services.

The servers of the cloud services used by Groupe Mutuel are located in Switzerland or in the European Union (EU). Companies offering such IT solutions may have a parent company in the United States.

3.6. Obligations of Groupe Mutuel employees, agents and service providers

On the basis of an administrative management agreement, Groupe Mutuel Services SA processes data for companies that are members of Groupe Mutuel Holding SA and other companies.

Groupe Mutuel may also have personal data, including sensitive data, processed by third parties in the performance of its tasks. If data is processed by a third party, Groupe Mutuel ensures that it is handled in accordance with its own commitments, particularly regarding confidentiality, usage, and potential disclosure.

Groupe Mutuel employees, agents and service providers are contractually bound to respect their data protection obligations. This obligation continues even after the relationship with Groupe Mutuel ends.

- Groupe Mutuel employees include all individuals with an employment contract, regardless of its duration. Apprentices and trainees are considered as employees.
- Agents are persons (natural persons or legal entities) bound by a mandate to Groupe Mutuel and who act on its behalf and in its interest.
- Service providers are persons (natural or legal) to whom Groupe Mutuel subcontracts or contractually delegates certain tasks.

4. Technical and organisational measures

4.1. Data storage media

Appropriate technical and organisational measures are put in place to secure data flows so that unauthorised persons cannot access, copy, modify or delete data.

4.2. Access management and control

Groupe Mutuel premises where personal data is processed and stored are electronically and/or physically protected against intrusion by unauthorised third parties.

Access rights are allocated not only on the basis of employees' professional needs but also according to their function and role.

Authentication is required for access to information systems. Physical and logical access rights are checked and reviewed periodically.

4.3. Data retention period



The data retention period is determined proportionally to the purpose of the processing. Once the retention period has expired, the data is rendered anonymous or destroyed, unless Groupe Mutuel has an overriding interest in retaining the data.

As a general rule, and subject to legal retention obligations applicable to Groupe Mutuel (especially in cases of accidents, disputes, etc.), personal data of clients is retained for the duration of the contractual relationship plus ten (10) years, primarily for evidentiary purposes.

4.4. Other procedures

Procedures for rectifying, blocking, anonymising, safeguarding, storing, archiving and destroying data have been put in place in order to meet the requirements relating to these issues.

5. Rights of data subjects

Data subjects have the right to access their personal data, request its delivery or transmission, object to processing, request correction, deletion, or destruction, and appeal to an independent authority.

Requests can be sent by post with a copy of an official ID to:

Groupe Mutuel
Data Protection Office
Rue des Cèdres 5
PO Box
1919 Martigny

or by email to: dataprotection@groupemutuel.ch

They can also be submitted via the GMnet client portal.

Personal data will be provided electronically unless the person requests a paper copy.

6. Final provisions

These regulations cancel and replace the previous ones and may be amended at any time without notice by Groupe Mutuel.

They are published on Groupe Mutuel's website and communicated to the Federal Data Protection and Information Commissioner (FDPIC).