



# Data Protection Declaration

GrECo International AG

Effective May 23, 2018

[www.greco-jlt.com](http://www.greco-jlt.com)





## 1 General information

Thank you for your interest in our website and our company.

Our website includes links to other websites, which are provided purely for the purpose of information. We check external links carefully. However we are not responsible for the content or security of these external links.

We protect the personal data you provide when visiting our website, and maintain your data privacy in our data processing, in accordance with the legal requirements. For further details on our data handling and protection policies, please read on.

### 1.1 The Controller for the processing of your personal data is

GrECO International AG  
Insurance broker and consultant for insurance matters  
1191 Vienna, Elmargasse 2-4  
Reg. no. 24158374  
Website: <https://www.greco-jlt.com/en>  
E-mail: [datenschutz@greco.at](mailto:datenschutz@greco.at)

Enquiries concerning data protection should be sent directly to the email address or postal address above.

### 1.2 Supervising regulatory authority

Österreichische Datenschutz Behörde (Austrian Data Protection Authority)  
Wickenburggasse 8, 1080 Vienna  
Phone: +43 1 52 152-0  
E-Mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)  
Web: <https://www.dsb.gv.at/>

## 2 How we use your data

### 2.1 What kind of personal data do we process and where do they come from?

The personal data we process include the following, provided by you in the course of our business dealings:

Data such as your personal details (name, address, contact details, date and place of birth, nationality, profession etc.), identity verification data (e.g. details of identity documents), and authentication data (e.g. sample signature). In addition, they can include details of transactions (e.g. payments), data required for the fulfilment of our contractual obligations (e.g. policy data), advertising and sales data, documentation data (e.g. consultation records), registration data, information from your electronic communications with our Group, data processing results obtained by the GrECO JLT Group, and data required for the fulfilment of our legal and regulatory obligations.

We also process data obtained from your insurers, from other GrECO JLT Group companies, from credit agencies (e.g. KSV1870 Holding AG) and from publicly available sources (e.g. Companies Register, Land Register, the media). We may also obtain data from public authorities (e.g. courts) or government officials.

We will keep you informed in accordance with our statutory obligations (GDPR, Art. 13 & 14).



We do not always have all the types of data mentioned above at our disposal.

## 2.2 Children's data

We do not enter into contracts with minors, and are not permitted to do so. When you accept an online contract or online services etc, you confirm that you are not a child, i.e. in Austria, that you are over 14 years old, or that your legal guardian has given consent.

## 3 Purposes and legal basis for processing of personal data

### 3.1 Fulfilment of contract subject to Art 6(1)(b) of the GDPR

We are independent insurance brokers and consultants. Personal data are processed in the course of our business relationships with customers (clients) and suppliers. These include electronically created, saved and archived documents (e.g. correspondence) concerning offers and acceptances of insurance contracts, or during other stages of contract preparation, or for the administration and fulfilment of our contractual rights and responsibilities, particularly in the event of damage claims, and for insurance advice; also photographs and other documents uploaded by you. Further information on our data processing is also included in your contract documents.

If the services we provide to you involve more than one GrECo JLT company, for example where insurance is provided in more than one country, your data need to be processed by each of the relevant GrECo JLT Group companies. The relevant Group companies are listed on our website <https://www.greco-jlt.com/en/greco-jlt-markets.html>.

### 3.2 Processing for the fulfilment of legal obligations

There are also some legal regulations which require that we process your personal data, e.g.:

- information provided to the judicial authorities and courts in the event of criminal proceedings, or to the financial authorities in the event of finance offences: Code of Criminal Procedures, Financial Criminal Code
- Prevention of fraud, benefit fraud or money laundering
- Processing for statistical purposes
- Regulations on the reporting of possible grievances

### 3.3 Data processing to safeguard legitimate interests in accordance with GDPR Art. 6(1)(f)

GrECo International Holding AG, as the controlling and holding company of the Group, provides various IT services and other services to the entire GrECo JLT Group. In order to safeguard the legitimate interests of the Controller and of any constituent company of the GrECo JLT Group, data may be processed for the purpose of balancing various interests beyond the specific fulfilment of a contract.

This includes the following types of data processing in particular:

- IT services and safeguarding of network and information security
- marketing including direct marketing
- monitoring and optimisation of GrECo JLT Group's range of services



- consultation from and data exchange within the GrECo JLT Group for the fulfilment of confirmed orders (e.g. if GrECo JLT Group companies in more than one state are involved)
- activities for the purpose of business management and further development of services and products
- enforcement of legal claims through judicial and extra-judicial proceedings
- prevention of fraud, benefit fraud or money laundering
- processing for statistical purposes
- processing for market research
- regulations on the reporting of possible grievances
- communications within the GrECo JLT Group for the above purposes

In addition to the GrECo JLT Group companies with which you have direct contracts, other GrECo JLT Group companies involved in the fulfilment of contracts (e.g. for revenue management), and GrECo International Holding AG (e.g. as IT service provider) may act as sub-contractors for data processing or (joint) Controllers.

With respect to the transfer of data to these GrECo JLT companies and other third parties, we emphasise that we are obliged to maintain data privacy and confidentiality of all customer details and information provided to us in the course of our business relationship. All employees of GrECo JLT companies who might possibly have access to your personal data, and all data processing (sub-)contractors are required to confirm in writing that they will maintain confidentiality and will only process personal data as authorised. GrECo International Holding AG in Austria, as the central IT service provider for all GrECo JLT companies, is monitored for data security in accordance with GDPR Art. 32.

### 3.4 Data processing for which you have given consent as defined in GDPR Art.6(1)(a)

Data provided by you may be processed in accordance with your consent, e.g. contact details for the distribution of newsletters and other information about insurance products, insurance brokerage and other services provided by your GrECo JLT partner, or photos provided by customers for the purpose of references or reporting on GrECo JLT events, or photos and contact details of employees on the website.

Where your permission is required for a specific category of data processing, we will not proceed until we have your express consent for that specific purpose.

For the settlement of claims it is sometimes necessary to process sensitive data (e.g. details of injuries), as defined in GDPR Art. 9, or data about (suspected) offences (e.g. in the case of traffic accidents), as defined in GDPR Art. 10. Where the processing of such data is not already covered under the terms of our contract requirements, you grant specific consent that we may process these data and forward them to insurance companies or brokers etc. If such data are provided to us from another source (e.g. an insurance company), you consent to these being processed by the GrECo JLT Group, and we will inform you when this is done.

Your consent may be withdrawn at any time. The withdrawal of consent does not affect the legality of earlier processing.

### 3.5 Are you obliged to provide us with your personal data? What happens if you do not wish to do so?

Our business dealings require customers to provide many personal details. For example, we cannot provide you with insurance without your name and address. If we do not have details of damages, we cannot help you with reporting and processing claims. We need to be able to process your personal data wherever this is necessary for contractual or legal reasons within the context of our business relationship. If you do not wish your data to be



used in this way, there may be certain products or services that we cannot provide. Where your specific consent is required for us to be able to process your data, there is no obligation for you to grant this consent or provide this type of data.

### 3.6 Is there any automated decision-making, including profiling, as defined in GDPR Art. 22(1) and Art. 4?

No, there is no automated decision-making. For insurance brokerage we check credit status by means of enquiries to credit protection associations. The evaluation of this kind of information is never automated.

## 4 Transmission and retention of personal data

### 4.1 Is your personal data shared, and if so, with whom?

The security of your personal data is important to us. For that reason your data are only shared where there is a contractual or legal requirement to do so, or where this is necessary for the protection of our legitimate interest (e.g. within the company), or with your consent. Your personal data may be shared with:

- insurance / reinsurance providers / authorised co-brokers and other contacts as necessary for arranging insurance for a specific case
- other GrECo JLT companies within the GrECo JLT Group, and third parties, the employees and agents of these companies, to the extent that this is necessary for the fulfilment of contractual, legal or regulatory obligations, and for the protection of legitimate interests, and particularly for the preparation or completion of insurance agreements (e.g. GrECo JLT Risk Consulting GmbH), or GrECo JLT companies, whose IT services (e.g. from GrECo International Holding AG in Austria as the central IT service provider for all GrECo JLT companies) or their back office services or service lines, for the fulfilment of our associated responsibilities or otherwise for the provision of our services
- public bodies and institutions, where we are legally required to do so (e.g. the trade licensing authority as regulatory authority, financial authorities)
- third parties acting on our instruction, e.g. lawyers third parties are contractually obliged to keep your data confidential and only to process them as necessary for the provision of service
- data may also be transmitted to third parties if you have given consent for this, e.g. to assessors in the event of a claim.

### 4.2 Are my personal data transmitted to third countries?

It is sometimes necessary to transmit data to a third country without adequate data protection regulations, e.g. in the event of cross-border insurance solutions, to the relevant partner GrECo JLT companies in third countries (Russia, Kazakhstan, Serbia, Ukraine and Turkey). For a list of countries where no adequacy decision has been reached, see our website <https://www.greco-jlt.com/en/greco-jlt-markets.html>. In the event that data have to be transmitted to a third country without adequate data protection, or to an international organisation, the EU standard contract clauses apply, or other guarantees of adequate data protection as defined in GDPR Chapter V.

GrECo JLT companies in third countries are contractually obliged within the GrECo JLT Group to uphold the standards of data protection and security as defined in the GDPR. This is also monitored, e.g. in Austria by GrECo International Holding AG, the central IT service provider of the GrECo JLT Group. GrECo International Holding AG, as central IT service provider (computing centre), also processes data for GrECo JLT companies in third countries.



In many cases, GrECo JLT companies may also be joint Controllers with other companies, including in third countries (e.g. for cross-border insurance solutions, or for a database of employee schedules which may be shared by them on a voluntary basis). In such cases, contracts for joint Controllers are signed which set out detailed requirements subject to GDPR Art. 26. Where GrECo JLT companies share data control responsibilities, your rights as a data subject and other expectations as laid down by the GDPR (see point 6 Your rights) can apply to each and every Controller, if no specific point of contact has been communicated to you (GDPR Art. 26(2)).

We do not generally use data processing agents outside the GrECo JLT Group in third countries. Payroll calculations for employees in some GrECo JLT companies in third countries are carried out by non-GrECo processors in the relevant country. These data processing contractors are also required to uphold the data protection and security standards of the GDPR.

#### 4.3 How long is your personal data retained?

Your personal data are always retained as long as necessary for fulfilment of the designated purposes. There are also legal regulations that determine how long we are required to retain the data. These obligations may also extend beyond the term of your customer relationship with us. For an overview of the legal obligations concerning retention of personal data, as applicable in Austria, please see:

<https://www.wko.at/service/wirtschaftsrecht-gewerberecht/eu-dsgvo-speicher-und-aufbewahrungsfristen.html>

#### 4.4 What security measures are in place for the processing of personal data?

Data protection and data security are very important to us. Our data processing is protected by technical and organisational measures. This includes in particular the protection of your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. The centralised provision of IT services for all GrECo JLT companies by GrECo International Holding AG, as the computing centre for Austria, supports this protection in all GrECo JLT companies.

Protective measures include for example the use of modern security software and encryption methods, controls on physical access, authorisation concepts, pseudonymisation and other precautions to protect against and prevent external and internal attacks.

## 5 Online media

### 5.1 Cookies

Cookies are used in various places on our website. The technology currently used for cookies does not allow them to run programmes or transfer viruses to your computer. Cookies are generally small text files that recognise users when they return to the website. However they do not save personal details such as names and addresses. So this information cannot be used to identify you.

### 5.2 Google Analytics web analysis service

To help us tailor the products we offer to best suit your needs, and to analyse responses to these product offers, we use the web analysis service Google Analytics, provided by Google LLC ("Google"), Amphitheatre Parkway, Mountain View, CA 94043, USA. For this purpose Google Analytics uses a type of cookies that are deleted after a minute, and that limit the number of enquiries users can make (gat); and also cookies that remember you as a



visitor to the website, either for 24 hours (gid) or for 2 years (ga). Google Analytics allocates a unique Client ID, to enable the user to be identified again in the future. This Client ID is used by Google Analytics cookies.

What data are captured by this tracking fragment?

- The total time that a user spends on the website
- The time a user spends on a specific page of the website and in what order they visit the pages
- Internal links clicked (based on the URL of the next page visited)

Additionally each new tracker uses the IP address, the user agent string (which gives information about the browser, operating system and language settings used) and the first visit to the website to determine the following details:

- geographical data of the user
- which browser and operating system are used
- screen size, and whether Flash or Java is installed
- related websites

As a rule, the information listed above is transmitted to a Google server, which may be located in the USA, and stored there. For this website, the IP anonymisation function is activated. This means your IP address is immediately pseudonymised (e.g. by removing the last 8 bits). This means that your location cannot be precisely identified.

Your IP address is shortened before being transmitted. In exceptional circumstances the IP address may be transmitted first, and then shortened by Google themselves. For these exceptional cases, where personal data is transmitted to the USA, Google is subject to the EU-US Privacy Shield (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>).

The data captured in this way are used by Google to provide the website owner with analyses of how the website is used, and demographic data about the users.

Google undertakes that the IP address transmitted by your browser during Google Analytics will not be merged with other data by Google. It is conceivable that personal data and personality profiles for users of the website could be processed by Google for other purposes beyond our influence.

The legal basis for the use of Google Analytics is GDPR Art. 6(1)p.1(f). By using our website you consent to our use of cookies. You can adjust the settings in your browser so that consent must be obtained before cookies are used, or that the use of cookies is blocked by default. To find out in more detail how this works, see the manufacturer's instructions for your browser. Deactivating cookies may limit the functionality of our website.

You can also specifically prevent data from cookies being collected and used by Google. Google offers a browser plug-in for this purpose: <https://tools.google.com/dlpage/gaoptout?hl=au>

We have an agreed processing contract with the supplier Google Ireland Ltd. Details of this third party supplier are as follows: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001.



### 5.3 Social networks

We work in cooperation with various social networks. If you use these social networks, your browser will automatically be linked to the relevant network. This transmits your IP address and other information such as cookies, if you have already visited the platform concerned.

As far as possible we avoid this kind of data transfer until you do actually interact with one of these platforms. By clicking the relevant symbol (e.g. the Facebook logo) you indicate that you are ready to communicate with the selected platform, and accept that information about you, such as your IP address, is transmitted to that social network.

Our website offers the option to interact with various different social networks via plug-ins. These are Facebook Ireland Ltd., Linked In Inc. USA and XING SE Deutschland.

We have no influence over the extent and content of the data transmitted to the operator of the social network when you click on its plug-in. If you would like to find out more about the type, extent and purpose of the data collected by the operators of these social networks, we recommend that you read the data protection policies of each social network.

### 5.4 Newsletter

On our website you can subscribe to our newsletter. You can also unsubscribe, by activating the “unsubscribe” link at the end of each newsletter, or contact us directly by replying to the newsletter.

This aspect of data processing is regulated by the legal provisions in TKG (Telecommunications Act) § 96 (3) and GDPR Art. 6(1)(a) (Consent).

### 5.5 Contact form

The information you provide in our contact form, including personal data, is transmitted to our own mail server, processed and saved by us so that we can respond to your enquiry. These data are not collected or forwarded without your consent. Without these data we cannot respond to your enquiry.

By using our contact form you confirm that you are not a child, i.e. in Austria, that you are over 14 years old, or that your legal guardian has given consent.

This aspect of data processing is regulated by the legal provisions in TKG (Telecommunications Act) § 96 (3) and GDPR Art. 6(1)(a) (Consent).

## 6 Your rights

You have the right of access, rectification or erasure or to restrict the processing of your saved data, the right to object to processing and the right to data portability, at any time, subject to the conditions of the data protection laws. Please direct any enquiries on these matters to the Controller for the processing of your personal data, as defined in point 1.1.

To ensure that your data do not fall into the wrong hands, and that no-one can erase your data against your wishes, it is essential that we check your identity every time you contact us.





Any complaints may be submitted to the regulatory authority:

Österreichische Datenschutz Behörde (Austrian Data Protection Authority)  
Wickenburggasse 8, 1080 Vienna  
Phone: +43 1 52 152-0  
E-Mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)  
Web: <https://www.dsb.gv.at/>

You have the following specific rights:

### 6.1 Right of access

According to GDPR Art. 15, Controllers must provide any data subject with access to personal data concerning themselves which is being processed.

### 6.2 Rectification and erasure

According to GDPR Art. 16 and Art. 17, you as a data subject have the right to demand the rectification and erasure of personal data concerning yourself.

### 6.3 Restriction of processing

According to GDPR Art. 18, you have the right to restrict the processing of personal data concerning yourself.

### 6.4 Data portability

According to GDPR Art. 20 you have the right to data portability. This is the right, under the conditions specified, to obtain personal data you have provided, in a structured, commonly used and machine readable format, and to require that these data be transmitted to a third party.

### 6.5 Right to object

According to GDPR Art. 21(1) every data subject has the right, for reasons arising from their particular situation, to object to the processing of personal data concerning themselves as required amongst other things for the protection of legitimate interests of the Controller or a third party. This also applies to profiling data based on this provision. You can object at any time to the processing of your personal data for the purpose of direct marketing (e.g. for a spotlight or newsletter), to be effective for the future.

## 7 Automated decision-making

We do not use automated decision-making as defined in GDPR Art. 22 for decisions on the establishment and operation of our business relationships.

## 8 Modification of this policy declaration

This policy declaration replaces all earlier versions. We reserve the right to modify this policy as necessary if circumstances change. The current version of this data protection policy is available at any time on our website at [https://www.greco-jlt.com/en/GIAT\\_data\\_privacy\\_statement\\_EN.pdf](https://www.greco-jlt.com/en/GIAT_data_privacy_statement_EN.pdf).



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JLT International Network  
Partner