



INFORMATION ABOUT DINA FÖRSÄKRINGAR'S PROCESSING OF PERSONAL DATA

1. Introduction

Dina Försäkringar consists of six insurance companies. We are owned by our customers and conduct insurance business in collaboration under the common brand name "Dina Försäkringar". When we provide our various products and services, we need to process personal data about you. We protect and value your personal integrity and want you to always feel safe and informed about how we process your personal data when, for example, you visit our website or purchase one of our insurance policies.

Below you can read more about what personal data we process about you, why we do it and what rights you have. If you have any questions about our processing of personal data, you can contact us or our data protection officer via the contact details that you will find under section 10 below. Under section 10, you can also find more information about which company or companies in the Dina Försäkringar Group are responsible for the processing of your personal data.

2. Which persons do we process personal data about and which personal data do we process?

2.1 The persons whom we process personal data about

We process personal data about you who come into contact with our business in different ways:

- *Visitors*: people who visit our website.
- *Household members*: private individuals registered at the same address as customers but who are not co-insured.
- *Contact persons*: individuals who, in their professional role, are the contact person for a company that is interested in purchasing or that have purchased an insurance policy from us.
- *Customers*: private individuals who have purchased an insurance policy. From a market law perspective, we view you as our customer throughout the insurance period and twelve months thereafter or from the last interaction with you, depending on what occurred last.
- *Co-insured*: private individuals who are a part of and are co-insured in an insurance policy.
- *Potential customers*: private individuals who have shown an interest in our products and services or who are part of the target group for our products and services.
- *Other persons related to an insurance with us*: private individuals who are otherwise related to an insurance with us, for example through a reported injury/damage with us where they are listed as the victim, the cause of the damage or a witness.

2.2 The personal data we process

Which personal data we process about you depends on the relationship we have, your engagement with us or which insurance policy is applicable. We divide the types of personal data that we process into the following categories:

- *Payment details*: account details, payer information, notifications and reminders.
- *Financial information*: income information (at individual and household level), declared information (at household level), insurance compensation and tax residence.
- *Insurance information*: insurance number, accounting number, information on insured persons or objects (at individual and household level), insurance premiums and claims information.
- *Identification data*: name, customer number, social security number, age and coordination number.
- *Contact details*: address, telephone number and e-mail address.
- *Object*:
 - housing, properties and buildings (e.g. type of housing/property/building, rented or purchased, living space, date of civil registration, main due date)
 - animal (e.g. chip number, breed, age, date of birth, main due date)
 - vehicle (e.g. registration number, vehicle identification number, brand/model, vehicle type, registration date, main due date)
- *Special categories of personal data ("sensitive personal data")*: information about health or about membership in trade unions, when it is necessary for us to be able to grant you a certain type of insurance or a certain benefit or settle a claim that requires this information. Depending on which insurance you have, we may also indirectly process sensitive personal data about you in order to fulfill our commitments, for example if you indicate a spouse, cohabitant or registered partner (may indicate sexual orientation) in a claims case.
- *Communication data*: content of e-mails, chats and other messages, recorded telephone conversations, received documents and images.
- *Technical data*: IP address, device, website settings, browsing habits and website behavior.

3. Why do we process your personal data and why are we allowed to do so?

3.1 Prior to entering into an insurance contract

Purpose of processing	Categories of persons and personal data	Legal basis
Determine which of our products and services the household may be interested in and marketing these to you.	Customers and potential customers:	Legitimate interest (GDPR, Article 6.1(f)).

Purpose of processing	Categories of persons and personal data	Legal basis
Includes profiling, read more in section 8.3 below.	Identification data, contact data and objects. Household members: Objects. Contact persons: Contact details.	Contact us if you want to know more about how we have balanced your interests against ours.
Determine which of our products and services the target group may be interested in and send marketing.	Customers and potential customers: Identification data, contact data and objects. Contact persons: Contact details.	Legitimate interest (GDPR, Article 6.1(f)). Contact us if you want to know more about how we have balanced your interests against ours.
Provide information and advice about our insurances and related services and products, respond to your quote request and to calculate and provide information about insurance premiums.	Customers and potential customers: Contact details, insurance - details, financial information, objects and sensitive personal data (depending on insurance). Contact persons: Contact details.	Agreement (GDPR, Article 6.1(b)). We process sensitive personal data when it is necessary to establish, assert or defend legal claims (GDPR, Article 9.2(f)). Legitimate interest (GDPR, Article 6.1(f)). Contact us if you want to know more about how we have balanced your interests against ours.
Document the advice we give you.	Customers and potential customers: Identification data, contact data, data on communication and objects. Contact persons: Identification information and contact information.	Legal obligation (GDPR, Article 6.1(c)), Law (2018:1219) on insurance distribution.

3.2 When entering into an insurance contract

Purpose of processing	Categories of persons and personal data	Legal basis
Performing risk assessment and calculate insurance premium and notify insurance.	Customers and potential customers: Identification data, contact data, insurance data, financial information, payment data (customers) and sensitive personal data (depending on insurance).	Agreement (GDPR, Article 6.1(b)). We process sensitive personal data when it is necessary to establish, assert or defend legal claims (GDPR, Article 9.2(f)).
Verify the policyholder's identity.	Customers and potential customers: Identification data and contact data. Contact person: Identification data and contact data.	Agreement (GDPR, Article 6.1(b)). Legitimate interest (GDPR, Article 6.1(f)). Contact us if you want to know more about how we have balanced your interests against ours.

3.3 During the insurance period

Purpose of processing	Categories of persons and personal data	Legal basis
Communicate with you and provide relevant information about current insurance policy, answer questions and respond to complaints.	Customers: Identification information, contact information, insurance information and communication information. Contact persons and co-insured: Identification information, contact information, insurance information (co-insured) and communication information.	Agreement (GDPR, Article 6.1(b)). Legitimate interest (GDPR, Article 6.1(f)). Contact us if you want to know more about how we have balanced your interests against ours.
Provide insurance and insurance renewal offers. Includes profiling, read more in section 8.3 below.	Customers: Contact details, objects and information about communication. Contact persons:	Legitimate interest (GDPR, Article 6.1(f)). Contact us if you want to know more about how we have balanced your interests against ours.

Purpose of processing	Categories of persons and personal data	Legal basis
	Contact details and information about communication.	
Manage and regulate insurance cases, claims and compensation.	<p>Customers:</p> <p>Identification data, contact data, insurance data, financial information, payment data, communication data and sensitive personal data (depending on insurance).</p> <p>Co-insured and other persons related to an insurance with us:</p> <p>Identification data, contact data, insurance data, financial information, payment data, communication data and sensitive personal data (depending on insurance).</p> <p>Contact persons:</p> <p>Identification data and contact data.</p>	<p>The processing is necessary both to fulfill our contract with you (GDPR, Article 6.1(b)) as well as to fulfill legal obligations (GDPR, Article 6.1(c)), Insurance Contracts Act (2005:104), Damages Act (1977:207) and traffic damage act (1975:1410).</p> <p>We process sensitive personal data when it is necessary to establish, assert or defend legal claims (GDPR, Article 9.2(f)).</p> <p>Legitimate interest (GDPR, Article 6.1(f)).</p> <p>Contact us if you want to know more about how we have balanced your interests against ours.</p> <p>We process sensitive personal data when it is necessary to establish, assert or defend legal claims (GDPR, Article 9.2(f)).</p> <p>Legitimate interest (GDPR, Article 6.1(f)).</p> <p>Contact us if you want to know more about how we have balanced your interests against ours.</p>
Prevent, investigate and deter fraud.*	<p>Customers, co-insureds and other persons related to an insurance with us:</p> <p>All categories of personal data mentioned in this section.</p>	<p>Legitimate interest (GDPR, Article 6.1(f)).</p> <p>Contact us if you want to know more about how we have balanced your interests against ours.</p> <p>We process sensitive personal data when it is necessary to establish, assert or defend legal claims (GDPR, Article 9.2(f)).</p>

Purpose of processing	Categories of persons and personal data	Legal basis
Confirm identity when logging in to the website.	Customers: Identification - data and contact details.	Agreement (GDPR, Article 6.1(b)).

* We use a Swedish insurance industry's common claims register (GSR) which contains certain information about damages as well as information about who requested compensation. We only use GSR in connection with claims settlement to see if you previously reported a claim with another insurance company. The purpose of the GSR is to provide a basis for insurance companies to identify unclear insurance cases and thereby counteract the payment of compensation based on incorrect information. The data can also be used in de-identified form for statistical purposes. The personal data controller for GSR is Skadeanmälningsregister (GSR) AB, Box 24171, 104 51 Stockholm. See gsr.se for more information about the processing of personal data in the register. We can also provide information to Larmtjänst AB regarding reported stolen and searched goods.

3.4 Development of our business and our service offering

Purpose of processing	Categories of persons and personal data	Legal basis
Improve our existing, and develop new, products and services.	All categories of persons: Technical data, statistical information*.	Legitimate interest (GDPR, Article 6.1(f)). Contact us if you want to know more about how we have balanced your interests against ours.
Adapt and improve the content and functionality of our website based on how you use our services in combination with other information we have about you, which is collected via cookies. Read more about cookies in section 8.1 below.	Visitors: Technical data.	Legitimate interest (GDPR, Article 6.1(f)). Contact us if you want to know more about how we have balanced your interests against ours.
Maintain and develop our internal operations (by analyzing our services, products and IT systems through troubleshooting, data analysis, testing and statistics).	Statistical information*.	N/A

* Statistical information is aggregated data that cannot be attributed to a specific person. Such information does not constitute personal data.

3.5 Legal claims, supervision, acquisitions and exercising of rights

Purpose of the treatment	Categories of persons and personal data	Legal basis
Protect our interests in the event of a dispute.	The categories of person and personal data that are necessary with	Legal obligation (GDPR, Article 6.1(c)), Insurance Contracts Act (2005:104) and Act (2015:671) on

Purpose of the treatment	Categories of persons and personal data	Legal basis
	regard to the dispute and the parties involved.	<p>alternative dispute resolution in consumer relations when we are obliged by law to resolve a dispute through alternative dispute resolution.</p> <p>Legitimate interest (GDPR, Article 6.1(f)) when we are not obliged by law to resolve a dispute through alternative dispute resolution.</p> <p>Contact us if you want to know more about how we have balanced your interests against ours.</p> <p>We process sensitive personal data when it is necessary to establish, assert or defend legal claims (GDPR, Article 9.2(f)).</p>
Respond to requirements and provide requested information from supervisory authority in case of supervision.	The categories of person and personal data that are requested during supervision.	Legal obligation (GDPR, Article 6.1(c)), GDPR.
Transfer our customer database in the event of a possible merger or acquisition.	The categories of persons and personal data covered by the merger or acquisition.	<p>Legitimate interest (GDPR, Article 6.1(f)).</p> <p>Contact us if you want to know more about how we have balanced your interests against ours.</p>
Accommodate your request to exercise any of your rights.	Contact details, identification details and the information required to meet your request.	Legal obligation (GDPR, Article 6.1(c) and Chapter III).

3.6 Comply with regulatory requirements

Purpose of the treatment	People and personal data	Legal basis
Submit statement of earnings and deductions about you and your insurance policies to the Swedish Tax Agency.	<p>Customers:</p> <p>Identification data and financial information.</p>	Legal obligation (GDPR, Article 6.1(c)), Tax Procedures Act (2011:1244).

Purpose of the treatment	People and personal data	Legal basis
	Contact persons: Identification data.	
Receive, respond to and keep records of complaints.	The categories of persons and personal data that are necessary with regard to the complaint.	Legal obligation (GDPR, Article 6.1(c)), Act (2018:1219) on insurance distribution, the Swedish Financial Supervisory Authority's regulations on insurance distribution (FFFS 2018:10) and the Financial Supervisory Authority's general advice on complaint handling regarding financial services to consumers (FFFS 2002:23).
Save accounting material.	Customers: Accounting number.	Legal obligation (GDPR, Article 6.1(c)), Swedish Accounting Act (1999:1078).

4. How long do we store your personal data?

We store your personal data for as long as it is necessary to fulfill the purpose for which we collected the personal data. This may mean that we have a need to preserve your personal data even after our customer relationship has ended. For example, as a general rule, we will store the personal data relating to a reported insurance claim for eleven years from the time the insurance contract ended. The reason for this is because you or someone else may be able to make a claim for compensation under the insurance contract during this time. When the prescription period for the insurance contract (which varies depending on the insurance we have agreed on) has expired, our unsettled matters are finally regulated and it is no longer necessary to store the personal data to fulfill the purpose for which they were collected, we will delete them. Another example is that we store certain data to be able to send you marketing for up to twelve months after the customer relationship ends. When personal data is no longer necessary to store for the purpose they were collected or by law, we will delete or de-identify them (the data will then no longer be attributable to you) in accordance with our policy for erasure of personal data. If you are not a customer of ours, the storage period for the data used for marketing is three months.

5. How do we obtain your personal data?

We mainly collect information directly from you, for example when you communicate with us, when you enter into an insurance contract with us or report an injury. We may also collect personal data about you from other sources, so-called third parties, for example:

- Contact details (collected from public records to ensure we have the correct address details for you),
- Segmentation data (collected from information companies),
- Information about your vehicles (from public vehicle and road traffic registers),
- Data on animals (from the Swedish Agency for Agriculture), and

- Details of your properties (from public property registers).

We may also receive information about you from our customer, for example if you are co-insured.

6. Do you have to provide your personal data?

In order to enter into an insurance contract with us, you must provide some of the personal data that we request. If you do not provide us with the personal data we request, this may, in some cases, lead to us not being able to provide the services and products you request because, without the data, we cannot comply with the requirements placed on us as an insurance company. We will clearly inform you about which information is mandatory in connection with you entering into a contract.

7. Who do we share your personal data with?

7.1 General

In order to be able to provide our insurances with associated services and products, as well as to comply with laws and regulations, we sometimes need to share your personal data with others, including other companies within the Dina federation and third parties who assist us in various parts of our business and help us deliver our services and products. Information about your non-life insurance holdings can also be disclosed to people with whom you share a household.

7.2 Suppliers and collaboration partners

In order for us to be able to fulfill our commitments to you, we share your personal data with our suppliers and partners, such as:

- *IT providers*: companies that manage the necessary IT operation, technical support and maintenance of our IT solutions.
- *Inspection companies and inspectors*: companies and individuals who carry out inspections for us and who have access to your personal data in order to perform the ordered service.
- *Marketing*: companies that help us with print and distribution, contact via e-mail, telephone, social media and other digital channels as well as advertising agencies.
- *Service providers*: other service providers who may handle your personal data in order for us to be able to fulfill our obligations towards you, for example providing insurance cover and settling claims.

7.3 Others/outside companies and third parties

We may also share your personal data with other companies and third parties, such as:

- *State authorities*: for example the Police, the Privacy Protection Agency (IMY), the Tax Agency and other authorities when it follows from legislation or in case of suspicion of crime.
- *Courts, the General Complaints Board and insurance boards*: in the event of a dispute or other review.
- *Contractors*: for example workshops, car companies, painters, craftsmen, etc. who perform a service for you as a customer.

- *Other insurers* , whose policies are taken out through us.
- *Reinsurers and reinsurance intermediaries* .
- *Other external parties* : for example Larmtjänst and GSR.

7.4 When our personal data processing takes place outside the EU/EEA

We always strive for your personal data to be processed within the EU/EEA, but in certain situations we may need to transfer your personal data to business partners or service providers located outside the EU/EEA (so-called "third countries"). It happens in some specific cases and to a limited extent to the USA.

Regardless of where your personal data is processed, we take all reasonable contractual , technical and organizational measures to ensure that the level of protection for this processing is equivalent to that which applies within the EU/EEA. To ensure that your personal data is protected in the same way as if it had stayed within the EU/EEA, we also include [the European Commission's standard contractual clauses](#) with our partners and service providers who process personal data in third countries. We also take additional technical and organizational security measures when this is needed, such as encryption and pseudonymisation .

8. Processings of personal data that we want to highlight

8.1 Cookies on our website

In order to provide our website and our services with the highest possible quality and display digital offers, we use cookies and similar tracking technologies on our website. A cookie is a text file that is saved on your device to give you as a visitor a smooth and good experience when using our website and our e-services. Further information about which cookies we use and how you can turn off tracking through cookies can be found at www.dina.se/om-oss/om-cookies .

8.2 Automated Decision Making

Automated decision making means a fully automated process where the current decision is made with the help of algorithms, i.e. without any manual influence from a human. Automated decision-making normally occurs when you apply for insurance on our website www.dina.se and the automated decision is made on the basis of the information about you.

Automated decision making also occurs in the claims settlement process for delayed baggage and means of transport. The automated decision is based on the information you provide to us in your claim report, previously reported claims and payment/insurance history and is assessed according to our current insurance conditions. We do this to offer our customers better and more efficient service in our digital channels and means that we can make a decision in your case more quickly. The result of the automated process is that we fully or partially grant your compensation claim, reject the claim, or have the claim reviewed by one of our administrators. You always have the right to contact us if you are not satisfied with the decision and want to object to it. See contact information in section 10. We will then review the information behind the decision and any additional information you provide us. The review will be carried out by a person who has the authority to change the decision if it turns out that it was made on incorrect grounds. You can also contact us directly if you want one of our case managers to process the case without automated decision making.

8.3 Profiling

When we process personal data to personalize your experience, create individual offers based on the circumstances of your individual case, for analysis or to predict expected behavior, this is called profiling. We use profiling within our marketing and sales process to provide you with information and offers that we believe are the most relevant to you and your household and to avoid you receiving unwanted information. This may mean that we process and analyze data about your objects, websurfing habits and search settings when using our website, as well as demographic data. You have the right to object to profiling. If you want to exercise this right, you can contact us.

8.4 Communication channels

We have several different communication channels that you can use to get in touch with us: letter, e-mail, telephone and the chat on our website. The personal data that is processed in the various communication channels is dependent on the information that you provide when you contact us. We will never require you to provide us with more personal data than is necessary for us to fulfill the purpose you have when you contact us.

9. Your rights

9.1 General

We are responsible for your personal data being processed in a legal, transparent and open manner in relation to you and that your data is correct and up-to-date. You have certain rights regarding our processing of your personal data. If you want to exercise any of your rights, you can contact us by using the contact details in section 10 or by using specially specified forms.

We will get back to you as soon as we can, and at the latest within one month of receiving your request. If we cannot answer your request or need more time, we will explain why.

9.2 Right of access

You have the right to know whether we process personal data about you or not. If we do so, you also have the right to receive information about which personal data we process and how we process it. You also have the right to receive a copy of the personal data we process about you.

If you are interested in some specific information, please indicate this in your request. For example, you can specify if you are interested in a certain type of data (for example, which contact and identity data we process about you), or if you want information about data from a certain time period. If you want to know what personal data we process about you, please contact our data protection officer or relevant customer support. You will find more detailed information about contact under section 10.

9.3 Right to rectification

If some of the personal data we process about you is incorrect, you have the right to have it corrected. You also have the right to supplement incomplete personal data with additional information needed for the data to be correct. When we have corrected your personal data, or supplemented it with new information, we will inform those to whom we have disclosed your data about the updated data, provided that it is not impossible or too inconvenient. If you request it, we will also tell you to whom we have disclosed your data. If you request correction, you also have the right to request that we limit our processing of your data while we investigate the matter. Keep in mind that you can correct certain information yourself under "my pages" on www.dina.se.

9.4 Right to erasure (right to be forgotten)

In some cases, you have the right to request that we delete the personal data we have registered about you. You have the right to have your data deleted if:

- The data is no longer needed for the purposes for which it was collected or otherwise processed.
- We process your data based on your consent and you withdraw your consent.
- If the processing takes place for direct marketing and you object to the data being processed for such purposes.
- You object to the processing of the data based on our legitimate interest and we cannot demonstrate that our reasons for the processing outweigh your interests.
- The personal data is processed in an illegal manner.
- We have a legal obligation to delete the personal data.

If we delete your data after you have requested it, we will also inform those to whom we have disclosed the data about the deletion, provided that this is not impossible or too inconvenient. If you ask us, we will also tell you to whom we have disclosed your information.

9.5 Right to restriction

Restriction means that the data is marked so that it may only be processed for certain limited purposes in the future. The right to restriction applies to:

- When you believe that the information is incorrect and you have requested correction. Then you can also request that the processing will be limited during the time that we investigate whether the data is correct or not,
- If the processing is illegal and you do not want the data to be deleted,
- When we no longer need to process the data for the purposes for which we collected it, but you need it to establish, assert or defend legal claims,
- If you have objected to processing that takes place with support in our legitimate interest. Then you can request that we limit the processing while we investigate whether our interest in processing your data outweighs your interests.

Even if you have requested us to restrict the processing, we are entitled to use the data for storage, if we have obtained your consent to the processing, to assert or defend legal claims or to protect someone's rights. We may also process the data for reasons relating to an important public interest. When the restriction ends, we will inform you about this.

If we restrict the processing of your data, we will also inform those to whom we have disclosed the data, provided that this is not impossible or too inconvenient. If you ask us, we will also tell you to whom we have disclosed your information.

9.6 Right to withdraw consent

You have the right to withdraw any consent you have given for a particular processing at any time. A withdrawal does not affect the lawfulness of our processing before the consent was withdrawn, but it may mean that we can no longer provide a particular service/product to you.

9.7 Right to object

You have the right to object to our processing of your personal data based on our legitimate interest. If you object to the processing, we will, based on your particular situation, evaluate whether our interests in processing the data outweigh your interests in the data not being processed for that purpose. If we cannot show compelling legitimate reasons that outweigh yours, we will stop the processing to which you object - provided that we do not have to process the data to establish, exercise or defend legal claims. If you object to the processing, you also have the right to request a restriction during the time we investigate the matter.

9.8 Right to data portability

Data portability means that you have the right to obtain the data that we have collected about you, from you, in a structured, generally available and machine-readable format and that you have the right to transfer this to another personal data controller.

The right to data portability only applies to:

- Information collected from you, about you,
- If the use is based on your consent or to fulfill an agreement with you, and
- The processing is automated.

9.9 Right to complain

Contact us if you are dissatisfied with how we process your personal data, and we can jointly try to resolve your issue.

You also have the right to submit a complaint to the supervisory authority. The Swedish Data Protection Authority (IMY) is the Swedish supervisory authority for our use of your personal data. You also have the right to file a complaint with the supervisory authority in the country where you reside or work, or in the country where you believe that a violation of the regulations took place.

10. Who is the data controller and whom you should contact

10.1 Personal data controller

Dina Försäkring AB and/or your local company in the Dina Försäkringar Group is the personal data controller for the processing of your personal data and is responsible for all processing taking place in accordance with current data protection legislation. The local Dina Försäkringar company can be identified in your insurance policy. In some cases, Dina Försäkring AB and your local Dina Försäkringar company have joint personal data responsibility for the processing of your personal data.

If you have questions about how your personal data is processed, contact Dina Försäkring AB or your local Dina Försäkringar company according to the contact details below.

Dina Försäkring AB (org. no. 516401-8029)

Address: Box 2372, 103 18 Stockholm
E-mail: info@dina.se

Dina Försäkringar Göta (org. no. 567200-4818)

Address: Sjukhusgatan 7, 553 05 Jönköping
E-mail: gota@dina.se

Dina Försäkringar Mitt (org. no. 586500–5135)

Address: Södra Kyrkvägen 3, 821 30 Bollnäs
E-mail: mitt@dina.se

Dina Försäkringar Nord (org. no. 589600–6581)

Address: Nipan 58, 881 52 Sollefteå
E-mail: nord@dina.se

Dina Försäkringar Syd (org. no. 532000–1372)

Address: Svensknabbevägen 15, 393 51 Kalmar
E-mail: syd@dina.se

Dina Försäkringar Väst (org. no. 568400–5209)

Address: Krokslätts fabriker 45, 431 37 Mölndal
E-mail: vast@dina.se

10.2 Our Data Protection Officer

Our data protection officer is tasked with supervising that we process personal data in accordance with applicable laws and regulations. If you have any questions, want to exercise your rights (described in section 9) or wish to make a complaint regarding our processing of your personal data, you can contact our data protection officer at dataskyddsbud@dina.se.

11. Changes to the information text

We reserve the right to change and update this information text on an ongoing basis and we therefore ask you to regularly check our website for any updates. In case of major changes, we will clearly inform you about this in an appropriate way.