

Disclaimer HIC (website)

In accordance with the European regulation of 27 April 2016 on data protection (GDPR), MLOZ Insurance, acts as data controller for the management of your health insurance contracts and has appointed a Data Protection Officer (who can be contacted by e-mail privacy@mloz.be, through the online form: <https://www.mloz.be/fr/eform/submit/formulaire-de-contact> or by mail to MLOZ Insurance - DPO - Route de Lennik 788A at 1070 Brussels).

Which data are processed?

Depending on the services you have subscribed to, MLOZ Insurance may process the following personal data:

- identification and financial data, consumption and living habits, personal characteristics, family composition, affiliations (past, present and future health insurance fund), previous insurer (data "A")
- as well as the following special data:
 - o national register number (data "B")
 - o and health-related data, namely
 - medico-administrative data, in particular in the invoices and claim reimbursement receipts issued to you by the healthcare providers (data "C.1")
 - and medical data (data "C.2").

The medical data are collected and processed under the supervision and the responsibility of the medical counsellor of MLOZ Insurance.

What are our sources of information?

The data which concern you come:

- essentially from yourself, your legal representative or any person you authorised to;
- from your health insurance fund or the National Association of Independent Health Insurance Funds, for the management of your affiliation or your compensations;
- from your previous health insurance fund or your previous insurer in case of a mutation;
- from the health care providers you have consulted;
- from other insurance companies in case of a duplicate insurance coverage, co-insurance or expenditures recovery;
- from our processors, if applicable.

Are your data processed securely?

All these data are processed by authorised personnel contractually bound by an obligation of confidentiality and professional secrecy based on the law. In addition, security measures are put in place to guarantee the confidentiality, integrity and availability of your data.

For what purposes are your data processed and on what ground(s)?

Your data are collected and processed for the various legitimate purposes and grounds listed below.

| Lawful basis | Purpose | Data concerned |
|--|---|--|
| <p>The execution of the insurance contract you have subscribed to (including the pre-contractual phase and the management of the end of the contract)</p> | <ul style="list-style-type: none"> a. Manage your affiliation (including the drawing up of an insurance proposal and the analysis of the subscription conditions), your payment requests and your transfer to another insurer; b. Implement the services provided for in the contract (including support services); c. Handle complaints about the services provided by MLOZ Insurance or its health insurance funds (as insurance agents). | <p>Data A, B and C.2</p> <p>Data A and C</p> <p>Data A and C.1</p> |
| <p>Our legitimate interest</p> | <ul style="list-style-type: none"> a. Offer the most appropriate insurance products in case of a mutation, in particular to ensure continuity of cover for your risks; b. Manage our costs; c. Select the people we will contact within the framework of our satisfaction surveys enabling us to evaluate and analyse the adequacy of the insurance products offered by the HIC MLOZ Insurance with your current or future needs. | <p>Data A</p> <p>Data A and C.1</p> <p>Data A</p> |
| <p>Your consent</p> | <ul style="list-style-type: none"> a. In the context of your affiliation (for insurance products including a medical questionnaire) and your payment requests; b. within the framework of your participation to our satisfaction surveys enabling us to evaluate and analyse the adequacy of the insurance products offered by the HIC MLOZ Insurance with your current or future needs; c. To optimise the amount of the interventions on the basis of your data related to the compulsory insurance and the complementary insurance. | <p>Data C.1 and C.2</p> <p>Data A</p> <p>Data A and C.1</p> |

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| <p>The legal obligation, imposed on MLOZ Insurance especially as an insurer towards the Control Office of health insurance funds (OCM/CDZ)</p> <p>Among the legal obligations are the following:</p> <ul style="list-style-type: none"> • the law of 13 March 2016 on the status and supervision of insurance or reinsurance companies, • the Circulars of the National Bank of Belgium, etc.; • the law on insurance of 4 April 2014, • the Insurance Distribution Directive (IDD), • AssurMiFID, • etc. | <p>The purposes arising from the legal obligations of MLOZ Insurance as an insurer include the following:</p> <ol style="list-style-type: none"> a. perform audits and controls in order to improve the quality of our services and to offer better services/products to our insured members to promote their physical, mental and social wellbeing; b. detect and repress errors or fraud on your part or on the part of the health care provider you have consulted; c. answer questions from supervisory authorities (such as the OCM/CDZ), the Insurance Ombudsman, etc.; | <p>Data A</p> <p>Data A and C.1</p> <p>Data A and C.1 (if applicable)</p> |
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Who can your data be communicated to?

Your personal data may be communicated:

- to yourself and/or your legal representatives (including the temporary administrator), or to your representative (professional adviser, lawyer, mediator...) in possession of a mandate, directly or through a health care professional of your choice, at your request;
- to your health care professionals, at your request;
- to your health insurance fund for the execution of the insurance contract as an (intermediate) agent of the HIC MLOZ Insurance;
- to our processors, for the realisation of the missions we have entrusted to them;
- to the Control Office of health insurance funds and other legal authorities empowered within the framework of their legal missions to supervise the activities of the HIC MLOZ Insurance;
- to our company auditor and the external auditors used by our internal audit department for its specific mission, all bound by an obligation of confidentiality;
- to the Complaints Manager of MLOZ Insurance, to the Complaints Manager of the health insurance fund concerned by the complaint, and to the Insurance Ombudsman for the handling of complaints;
- to any duly authorised third party (law, contract, authorisation, consent);
- to the health care professionals/health care providers you have consulted to carry out verifications;
- to other insurance companies in the event of a duplicate insurance coverage, co-insurance or expenditures recovery in the event that a third party is liable for the occurrence of the damage;
- to other health insurance funds, especially for a transfer or mutation of your file.

Who are our processors?

The MLOZ Insurance mainly uses the following processors: the non-profit organisation MLOZ IT, which is our IT supplier, the National Association of Independent Health Insurance Funds, which performs some support functions for the HIC MLOZ Insurance, the independent health insurance you are affiliated to and which acts as an (intermediate) agent for the management of your contracts, and the company in charge of the actuarial function on behalf of the HIC MLOZ Insurance. On a less recurrent basis, the HIC MLOZ Insurance uses the following processors: support in Belgium for some health problems (especially nursing after an hospitalisation, child care at home, home help and care), debt collection companies, lawyers or bailiffs in the event of a litigation with an insured person, companies for the management of certain mail and the digitisation of your documents. Furthermore, it is important to specify that the HIC MLOZ Insurance ensures that each of its processors provides sufficient technical and organisational measures to meet the legal requirements regarding data processing.

Are your data transferred to countries outside the EEA?

Your data will not be transferred to countries outside the EEA unless you specifically request it.

How long do we keep your data?

We keep your data from the time you first contact the HIC MLOZ Insurance for the purpose of taking out an insurance policy until 10 years after the end of your insurance contract, regardless of the reason for the termination of the contractual relationship, except

- in the event of legal proceedings, in which case we keep the data and documents necessary for the proceedings for the entire duration of the proceedings.
- if you do not complete your subscription to one of our products, in which case the data processed in the context of the beginning of this subscription will be kept for 6 months. Data processed in the context of your actual subscription to other products will be kept in accordance with the first paragraph.

What are your rights?

You have the right to access the data we process and which concern you and to know, for each of them, how they are processed and for what purposes. In addition, provided that the exercise of these rights does not contradict the legal requirements (especially the retention one) the HIC MLOZ Insurance is subject to or does not prevent the execution of the insurance contract(s) you have subscribed to, you also have the right to request the rectification of any inaccurate or incomplete data, to request the deletion of all or part of it, to object to its processing, to transfer your data to another operator, to limit its processing and not to be subject to an automated decision, including profiling.

Can you withdraw your consent?

You have the right to withdraw your consent at any time and without justification. In this case, operations processed on this basis can no longer be carried out, which could have an impact on the proper execution of your contract.

MLOZ Insurance is nevertheless legally required to manage personal data in the context of the performance of its own legal requirements.

How do you exercise your rights?

To exercise one or more of your rights, you can use the online form available on the HIC MLOZ Insurance website (<https://www.mloz.be/fr/eform/submit/formulaire-de-contact>) or send us a written, dated and signed request to the following address: MLOZ Insurance - DPO - Route de Lennik 788 A, 1070 Brussels, enclosing a two-sided copy of your identity card.

Your request will be processed within 30 days of its submission. According to the complexity and number of requests, this period may be extended by a further 2 months if necessary. You will be notified of the action taken by the MLOZ Insurance on the basis of this request by e-mail or by post according to the medium you have chosen. Likewise, any refusal of intervention will be motivated. In addition, the request to exercise one or more of your rights will be communicated, where necessary, to the processors which received the personal data concerned by the request.

In the event of disagreement with a processing operation or a refusal on our part to accede to a request to exercise one of your rights, you can always contact the Data Protection Authority, located at rue de la Presse 35, 1000 Brussels or via the website www.dataprotectionauthority.be.

Adaptation of this privacy disclaimer

This disclaimer may be adapted over time, particularly in the event of new processing operations. We therefore invite you to consult the latest version of our disclaimer on our website.