

Schedule on Personal Data Protection

Data Protection Policy

As a provider of quality health insurance, our members and customers expect us to carefully use and protect the personal data (as defined below) that they share with us.

As a Cigna member, you are receiving this Data Protection Policy either because your employer has taken out an insurance with us, as an insurer, to provide you, directly or through our partners, with health insurance coverage and other additional coverages or services that may apply (referred to herein as the 'Services'), or because you otherwise benefit from our Services (for example, as a dependent, or as a member or beneficiary under an individual policy).

In order to provide you with our Services, we collect and process your personal data. This Data Protection Policy explains how and why we use your data, and indicates what rights you have in this regard.

In addition to this Data Protection Policy, some of our products and of our products and services may have a separate policy, which will describe in detail how your personal data are used in a particular context (for example, our Website).

'Personal data' means any information that identifies you or relates you to other people who also benefit from our Services (e.g. dependents). This information will be provided to us by you or, otherwise, by an authorised third party (e.g. medical professionals or your employer in the case of group policies).

Due to the nature of the Services to which you are entitled, your personal information may contain specially protected data such as, for example, your medical condition or state of health.

Data Controllers

Cigna Life Insurance Company of Europe, SA/NV, Sucursal en España, with address at en Parque Empresarial La Finca, Paseo del Club Deportivo, I -Edificio I4- Planta Primera, 28223, Pozuelo de Alarcón – Madrid ('Cigna Healthcare' or 'we' or 'us') will process personal data relating to the applicant/policyholder (in case of individual policies), member and beneficiary (jointly, the 'Data Subject'), as the data controller as described in this Data Protection Policy.

Categories of personal data we collect

The personal data we process from Data Subjects comprises the following categories:

- General information, such as the name, address, contact details, date of birth, sex and relationship with the Policyholder (in case of individual policies where the Data Subject is a person other than the Policyholder).
- Identifying information, such as the ID number, passport or driver's licence number.
- Information concerning the provision of the Services (for example, to review and reimburse medical expenses or to issue a guarantee of payment where applicable).
- Professional information, such as job title or any other information that may be strictly necessary to provide the Services, provided that there is a connection between access to the Services and the job title or professional category of the Data Subject.
- Information on past policies and expense reimbursements.
- Financial information, such as banking or payment information.
- Call recordings and other records of communications with the Data Subject.
- Sensitive data, including data about the Data Subject's current and past health condition, both physically and mentally.

The Data Subject's personal data are collected from multiple sources, including:

- Directly from the Data Subject, or from another person on behalf of the Data Subject (such as a family member formally authorised to do so).
- Health care professionals and other health care providers, as well as other third parties who are to provide the Services to the Data Subject (e.g., loss adjusters, claim managers, experts (including medical experts). In particular, in the event that the Data Subject requests and actually makes use of the Second Medical Opinion service, Advance Medical Health Care Management, S.A., with registered office at Via Augusta 252-260, 08017 Barcelona ('Advance Medical') shall transfer to Cigna both the information related to the medical opinion, as well as any other information that the Data Subject provides to Advance Medical, for Cigna to offer and, where applicable,

provide the coverage of the Clinical Monitoring Unit of the Policy.

- Other third parties involved in or related to the provision of the Services, such as brokers, other insurers, claimants and defendants.
- The employer of the Data Subject (in the case of group policies).
- Medical reports and legal advice.
- Emergency assistance.
- Other Cigna group companies if necessary in order to provide the Services to the Data Subject.
- Common files covered by insurance industry codes of conduct for fraud detection and prevention purposes and sanction detection tools.

Cigna has the obligation to collect the Data Subject’s personal data as a result of a contractual requirement, either from the Data Subject directly in the case of individual policies, or from the Data Subject’s employer in the case of group policies. If the Data Subject does not provide such data, this may prevent or delay the performance of our obligations. For example, we will not be able to provide the Services if the Data Subject does not provide certain personal data.

Purposes and processing of personal data

The Data Subject’s personal data will be processed in order to provide the Services, manage your plan and, in general, carry out our insurance business regarding the Services to which you are entitled.

In particular, we process the personal data of the Data Subject in order to:

- Provide insurance and healthcare services including, for example, the assessment of reimbursement of medical expenses, their processing and payment and, where appropriate, the settlement of claims.
- Communicate with the Subject and other third parties as part of our Services, including the employer in the case of group policies.
- Manage the relationship with the Data Subject through the private member area available on our website cignasalud.es, from where you will be able to manage reimbursements and authorizations, and perform other arrangements related to the Services.
- Send relevant information regarding changes in our policies, terms and conditions and other administrative information.
- Make non-automated decisions about whether to offer the Services to the Data Subject.
- Improve quality, security and training (for example, related to monitoring or recording calls to any of our contact telephone numbers).

- Continually improve and test the quality of our Services (for example, by conducting satisfaction surveys, research and analysis in connection with the Services).
- Protect our business from fraud, including conducting appropriate checks and verifications to detect, prevent and investigate medical claim and reimbursement fraud.
- Manage our operations and comply with internal policies and procedures related to, for example, audits, financial performance analysis and accounting, billing and collections, information systems, business continuity, and records, document and print management.
- Settle complaints and handle requests.
- Comply with the legal obligations to which Cigna is subject, including those related to money laundering and terrorist financing, as well as responding to public, government and litigation requests.
- Establish and defend legal rights, protect our operations or those of any other Cigna group company or other insurance partners, protect our rights, privacy, security and property, and/or those of our business group, the Data Subject or others, and seek remedies or mitigate damages.

As indicated above, we may use the Data Subject’s personal data for a series of purposes that are related to the Services we provide. In this regard, the processing of the Data Subject’s personal data will be covered by the following legitimate bases:

- The use of the personal data of the Data Subject is necessary to execute the corresponding insurance contract.
- The concurrence of a legal or regulatory obligation to process the Data Subject’s personal data. For example, we rely on this legitimate basis to comply with money laundering and terrorist financing obligations.
- The existence of a legitimate interest in processing the Data Subject’s personal data. We will use this legitimate basis for the purposes of quality improvement and training, as well as to manage our infrastructure and operations. When we collect and process the Data Subject’s personal data under this legitimate basis, we will implement appropriate safeguards to ensure we protect the Data Subject’s and that our legitimate interests do not affect the interests or the rights and freedoms of the Data Subject.

Given the nature of the Services to which the Data Subject is entitled, we may process sensitive data related to the Services. Nevertheless, the consent of the Data Subject is not necessary to process their health data, since we are legally entitled to process them as an insurer.

Recipients of personal data

We may share the Data Subject’s personal data with third parties in case this is necessary to provide the Services to which the Data

Subject is entitled or for the purposes described in this Data Protection Policy. The disclosure of the Data Subject's personal data means that the Data Subject's personal data will be shared with and/or accessed by the following third parties:

- Companies of the Cigna group. However, access to personal data within Cigna will be restricted to persons and entities that are required to access personal data for the purposes described in this Data Protection Policy.
- Other insurance or distribution entities, such as other insurers, reinsurers, brokers, other intermediaries and agents, and their respective representatives.
- Healthcare professionals and providers of medical assistance and travel assistance services.
- Third-party service providers, such as IT systems, support and hosting, document management and records, translators and other third-party providers similar to the above, as well as outsourced service providers who assist us in conducting our business.
- External professional advisors and collaborators, such as medical professionals, accountants, auditors, experts, consultants, lawyers, banks and financial institutions that manage our accounts, claims investigators, loss adjusters and others.
- Investigation companies that we instruct to investigate, at our expense, certain claims for service or reimbursement of expenses that we suspect may be fraudulent.
- Our regulators and other government or public authorities, where necessary to comply with a legal or regulatory obligation.
- The police and other third parties or law enforcement, courts, regulators, government authorities or other similar third parties, where necessary for the prevention or detection of an offence or to comply with a legal or regulatory obligation, or to otherwise protect our rights or the rights of a third party.
- Recovery and Subrogation Agencies.
- Selected third parties in connection with the sale, transfer or disposal of our business.
- Other third parties, such as emergency service providers (fire, police and emergency medical services) and tour operators.
- In the case of group policies, the Data Subject's employer or company acting on their behalf, to monitor, audit or manage the Services and to fulfil contractual obligations relating to the Services.

As a result, the personal data that may be shared will be the minimum required to provide the Services the Data Subject is entitled to. Under no circumstances will Cigna provide any sensitive information (i.e. medical information relating to the Data Subject) to the Employer without first requesting the express consent of the Employer.

In the case of group policies, we may also need to share part of the personal data of the Data Subject with their employer in the event of an emergency medical evacuation or repatriation

(**'Emergency'**). Such communication will be made in order to ensure the health and safety of the Data Subject and to achieve the best possible outcome in the event that an Emergency occurs while the Data Subject is outside their country. During the course of the Emergency, we will seek to mitigate significant and immediate effects of disease, injury or conditions that, if left untreated, could result in serious deterioration of health and pose a threat to the Data Subject's life. During the complexity of these situations, interaction with the Data Subject's employer may be necessary to provide additional assistance to ensure the best possible outcome during evacuation and/or to discuss whether other assistance is needed within or outside of the plan managed by Cigna.

Information to be shared will include: date of evacuation or repatriation, location to and from which the patient will be evacuated or repatriated, medical conditions that require evacuation or repatriation, and the patient's medical needs during the Emergency.

Once the Data Subject has been safely repatriated or evacuated, the information will automatically be no longer shared with the employer.

- Common claims files that are shared with other insurers to verify information and to detect and prevent fraudulent claims. Personal data included in these files may include details of injuries.

Some of the recipients of these categories may be located within the European Economic Area or may process and access the Data Subject's personal data from outside the European Economic Area, as described in the following section of this Data Protection Policy.

International transfers of personal data outside the European Economic Area

Given the nature of the Services to which the Data Subject is entitled, the Data Subject's personal data may be shared with and/or accessed by third parties located in countries outside the European Economic Area that have a different level of protection than Spain. These countries may include some that the European Commission may consider that do not ensure an adequate level of protection for personal data.

In that case, upon transferring the Data Subject's personal data to any of those countries, we will do so in accordance with the applicable regulations on data protection. This would include taking the necessary safeguards, such as contractual obligations, to protect the Data Subject's personal data and fundamental rights and freedoms, as well as the rights relating to their personal data.

Should the Data Subject wish to obtain further information about the measures in place to protect their personal data, or in case they wish to obtain a copy of the safeguards in place, the Data Subject may contact us using the contact details indicated in the 'Contact' section herein.

Retention of information

At Cigna, we ensure that appropriate procedures are in place to use the Data Subject's personal data and to delete and/or store them where necessary.

Generally speaking, we only keep the Data Subject's personal data for as long as necessary to:

- Provide the Services.
- Meet the purposes described in this Data Protection Policy.
- Comply with our legal obligations and/or protect our rights.

Upon termination of the provision of the Services, the Data Subject's personal data will be protected and deleted once the retention period has expired in order to comply with our legal or regulatory obligations and/or to protect our rights. By default, our retention period is 10 years. However, depending on the jurisdiction governing the insurance contract and the type of information processed, this period may range from 7 to 10 years.

Should the Data Subject wish additional information about the retention and storage periods of their personal data, they may use the contact details indicated below in the 'Contact' section herein.

Rights

Pursuant to data protection regulations, the Data Subject has certain rights in relation to the personal data that Cigna processes about them which they may exercise by using the contact details indicated below in the 'Contact' section of this Data Protection Policy.

The rights of the Data Subject include:

Right of access to personal data.

The Data Subject has the right to obtain a copy of the personal data that Cigna stores about them, as well as certain details about how the data are used.

Generally speaking, such requests will be processed at no cost to the Data Subject.

The Data Subject's information will normally be facilitated in writing, unless the Data Subject requests that they be provided in another manner, or that the request is made by electronic means, in which case the information will be provided in writing.

Right to rectification

Cigna takes appropriate measures to ensure that the information it stores about the Data Subject is accurate and complete. However, if the Data Subject believes that this is not the case, they may request the update or correction thereof.

Right to erasure

In some circumstances, the Data Subject has the right to request the deletion of their personal data. However, in some cases, exercising this right may mean that the Services cannot be provided to the Data Subject.

Right to object and to request the limitation of the processing

Under certain circumstances, the Data Subject has the right to object to the processing of their personal data, or to request that they are not used. However, in some cases, exercising these rights may mean that the Services cannot be provided to the Data Subject.

Right to portability

In some circumstances, the Data Subject has the right to request their personal data in a commonly used electronic format, and to have them sent to another third party of their choice.

Right not to be subject to automated decision making (including profiling)

The Data Subject has the right not to be subject to decisions based solely on automated processing. However, our decisions will never be based solely on automated means.

Right to withdraw consent

As explained above, we collect and process the Data Subject's personal data (including sensitive data) to provide the Services under different legitimate bases, which is why it is not necessary to obtain the Data Subject's consent.

Right to file a complaint with the Spanish Data Protection Agency

The Data Subject has the right to file a complaint with the Spanish Data Protection Agency (www.aepd.es) if they consider that any processing of their personal data by Cigna is in breach of the applicable data protection regulations.

The filing of a complaint will not affect any other rights or actions of the Data Subject.

Information Security

To protect the Data Subject's personal data, we will take appropriate technical, physical, legal and organisational measures that are consistent with the applicable data protection regulations.

Changes to the Data Protection Policy

We may update this Data Protection Policy from time to time to ensure its accuracy. Therefore, the Data Subject should check it every time they facilitate their personal data. In case that the changes to the Policy will have a material impact on the processing of the Data Subject's personal data, or otherwise significantly

impact the Data Subject, we will notify the Data Subject in sufficient time to give them the opportunity to exercise their rights in relation to their personal data.

This Data Protection Policy was last updated in July 2024 to comply with the European Union's General Data Protection Regulation, applicable as of 25 May 2018.

Contact

In case the data subject has any doubt or question about how Cigna collects, stores or uses their personal data, they may contact our Data Protection Officer at:

Data Protection Officer Plantin
Moretuslei 309, 2140
Antwerp, Belgium.

Email: GDPR@cigna.com



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Paseo del Club Deportivo, 1, Edificio I4. Planta Primera
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[cigna.es](https://www.cigna.es)