

Privacy Notice – Data Protection

1. Introduction

For Alto Groupe SA, data privacy is of great importance, and we strive to maintain transparency in how we process your personal data. We have therefore established guidelines for the processing and protection of your personal data.

This document explains how Alto Groupe SA, as an insurance broker, collects, uses, shares, and stores the personal information you provide and informs you of your rights regarding the use, access, and correction of your personal information. Alto Groupe SA is committed to ensuring that all personal data received is protected and processed in accordance with applicable data protection laws.

The terms we, our, and us below refer to Alto Groupe SA.

2. Who we are

Alto Groupe SA is an insurance brokerage company headquartered at Route de la Gare 36, 2012 Auvernier, Switzerland.

3. What personal data we process

We collect information necessary for insurance advice and claims management:

Private individuals: identity, age, marital status, family situation, private address, professional activity, income, private phone, work phone, mobile phone, email address(es), bank details (IBAN), list of your insurance policies, nationality, social security number (AVS), vehicle registration number.

Employees of our client companies: the following data may be collected via the employer: identity, age, marital status, family situation, private address, professional activity, income, private phone, work phone, mobile phone, email address(es), nationality, social security number (AVS).

Users of our Gen+ claims platform: identity, professional email address, work phone number.

4. Why we collect your personal data

We collect your data to provide personalized advice for you or your company, assist you in the event of a claim, and offer renewals in line with your needs when a policy expires.

5. Where we store your data

Your personal data is stored in Switzerland. If personal data is transferred, it will be done in compliance with applicable laws. Computerized data is securely protected.

6. Indirect collection of personal data

In the event of a claim, the employer provides us with the personal data of the affected employee(s) (absent staff, responsible parties, or injured parties). The type of data collected is listed under "3. What personal data we process; Employees of our client companies."

Data is not publicly accessible.

7. With whom the data is shared

Relevant data is shared with insurers in the context of a request for proposal or a claim notification. Insurers are primarily based in Switzerland, and occasionally in the United Kingdom for certain specific insurance coverages. Under no circumstances do we transfer or sell your data to third parties for purposes other than fulfilling our mandate.

8. How long we keep your data

Your data is retained for 10 years after the end of your relationship with us, according to Swiss law. Data may be kept longer if reasonably deemed potentially relevant for litigation, in case of complaints, or for other legitimate business reasons.

9. Your rights

As an individual, you have rights regarding the personal information we hold about you. If you wish to exercise any of these rights, we may ask for proof of identity.

You have the following rights:

Right of access

You have the right to confirmation that we process your data, a copy of the data we hold, information about the purpose of processing, who we share it with, whether it is transferred abroad, how we protect it, how long we retain it, your rights, how we obtained your data, and where/how you can lodge a complaint.

Right to rectification

If you believe that the personal data we hold is inaccurate or incomplete, you have the right to request correction.

Right to erasure or “right to be forgotten”

If you terminate your mandate, cancel a contract, or believe the personal information is no longer needed for the purposes it was collected, you may request deletion.

However, your request will be balanced against other factors such as regulatory or legal obligations, meaning we may not always be able to comply.

Right to restriction of processing

You can request that your personal data be restricted (i.e., retained but not used) in the following cases:

- a) Accuracy is contested to allow verification
- b) Processing is unlawful, but you do not want data erased
- c) Data is no longer needed for original purposes but is needed to establish, exercise, or defend legal claims
- d) You exercised your right to object and verification of compelling reasons is pending

We may continue to use your personal data after a restriction request with your consent, to establish, exercise, or defend legal rights, or to protect the rights of another natural or legal person.

Right to data portability

If we collected your data under a contract or with your consent, you may request that we transfer your personal information to a third party of your choice.

Right to object

You have the right to object at any time to the processing of your personal data based on public or legitimate interest. You may also object when processing is necessary for legitimate interests unless your interests, rights, or freedoms, particularly as a child, override these interests. You also have the right to object to direct marketing use.

Right to withdraw consent

You may withdraw your consent at any time if your personal data is processed based on your consent. There is no obligation to comply if the request would infringe on the rights and freedoms of others.

Right to lodge a complaint

You may lodge a complaint by emailing our Data Protection Officer at: s.bongard@altogroupe.ch

10. Necessity of providing data

The data is required for the following purposes:

Private individuals: to analyze insurance coverage, for requests for proposal, replacement of insurance coverage, or concluding new insurance policies.

If data is not provided, specific insurance management and objective analysis cannot take place.

Employees of our client companies: for claims management or concluding specific insurance coverage.

If data is not provided, the claim cannot be processed, no compensation can be issued, and a specific coverage cannot be procured.

Gen+ claims platform users: to provide individual and confidential access to the secure claims management platform.

If data is not provided, access cannot be granted.

11. Automated decision-making

There is no automated decision-making.

12. Further processing of data

Personal data will only be processed within the scope of the activities described in this document.

Alto Groupe SA – Route de la Gare 36 – 2012 Auvernier