



Information about the use of your data

These guidelines provide information about how your personal data is used by AXA Versicherung AG and your rights in accordance with data privacy law. The policyholder will pass on this information to other parties involved in the contract (e.g. the insured persons, the contribution payer if different, authorised representatives, beneficiaries if different, etc.). You can find the up-to-date version of this information at www.axa.de/datenschutz.

Who is the controller of the data processing?

AXA Versicherung AG, Colonia-Allee 10-20, 51067 Köln
Telephone: 0800 3203205
Email: service@axa.de

You can contact our data protection officer by post addressed to the above contact address with the addition of “Data Protection Officer” – or by email addressed to: Datenschutz@axa.de

For what purposes and on what legal basis is your data processed?

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG) and the provisions of the Insurance Contract Act (VVG) which relate to data privacy, as well as all other authoritative laws. Furthermore, our company has committed to the “Code of Conduct for the Handling of Personal Data by the German Insurance Industry”, which further define the above-mentioned laws for the insurance industry. You can view these at www.axa.de/datenschutz.

If you make an application for insurance cover, we need the data you provide when doing so in order to conclude the policy and to assess the risk we are to assume. If the insurance policy is concluded, we process this data in order to implement the contractual relationship, e.g. issue the policy or draw up invoices. Details on losses are required, for instance, so that we can check whether an insured event has occurred and, if so, how high the loss is.

The conclusion or implementation of the insurance policy is not possible without processing your personal data.

Furthermore, we require your personal data in order to compile insurance-specific statistics, e.g. for the development of new tariffs or for the fulfilment of regulatory requirements. We use the data of all of the policies existing with an AXA company in order to be able to consider the entire customer relationship, for instance to advise on a policy adjustment or amendment, to make goodwill decisions or to provide comprehensive information. The legal basis for such processing of personal data for pre-contractual and contractual purposes and for loss settlements is Article 6, para. 1 b) GDPR. If special categories of personal data are required in this regard (e.g. your health data when taking out an accident insurance policy), we will ask for your consent in accordance with Article 9 para. 2 a) in conjunction with Article 7 GDPR. Where we compile statistics with the help of such categories of data, this is done on the basis of Article 9 para. 2 j) GDPR in conjunction with Section 27 BDSG.

We also process your data in order to protect our legitimate interests or those of third parties in accordance with Article 6 para. 1 f) GDPR. This may be necessary in particular:

- to safeguard IT security and IT operations including software tests (where not already required in order to implement the policy) and to combat data misuse,
- to advertise our own insurance products and other products offered by AXA Group companies and their cooperation partners as well as for conducting market surveys and opinion polls,
- to prevent and investigate criminal offences; in particular, we use data analyses to detect signs that may point to insurance fraud and to possible recourse claims,
- for risk management purposes within the company and within the AXA Group as a whole,
- for business management and the improvement of processes, services and products.

In addition, we process your personal data for the fulfilment of statutory requirements, e.g. regulatory requirements and obligations to retain data under commercial and fiscal law, of our duty to advise, in our internal control systems, for audits by independent advisors, for the prevention of money laundering and terrorist financing, or to respond to requests from authorities or other public bodies such as the courts. The processing is in this case based on the respective statutory provisions in conjunction with Article 6 para. 1 c) GDPR. Insofar as special categories of data as defined in Article 9 para. 1 GDPR are processed in this connection, the legal basis is, with regard to the processing of health data, your consent pursuant to Article 9 para. 2 a) GDPR, if you have granted it, or otherwise Article 9 para. 2 g) or f) GDPR.

As far as is adequate and legally permissible for the respective purpose, we pseudonymise and/or anonymise your personal data. In particular, personal data is anonymised:

- for statistical analyses and analyses for business management,
- for the optimisation and testing of software-based data processing, including technical troubleshooting,
- as a method for the erasure of personal data in order to fulfil our obligations under data law regarding the erasure of data,
- for the performance of hardware and/or software tests as well as technical acceptance tests and
- for the data to be made available to our service providers, associations and research centres.



Depending on the stated purposes, the legal basis for the pseudonymisation or anonymisation will generally be our legitimate interest according to Article 6 para. 1 f) GDPR, the implementation of a legal requirement according to Article 6 para. 1 c) GDPR or the performance of a contract according to Article 6 para. 1 b) GDPR. In the event of a change of purpose, we ensure that the anonymisation is consistent with the original purpose of the data processing and is permissible (Article 6 para. 4 GDPR in conjunction with the original legal basis). This applies in particular to the anonymisation of your health data. For the pseudonymisation and/or anonymisation of special categories of personal data, the legal basis is your consent pursuant to Article 9 para. 2 a) GDPR, if you have granted it, or otherwise Article 9 para. 2 g) GDPR.

Where we wish to process your personal data for purposes not specified above, we will inform you in advance on our website and by other means in compliance with the statutory requirements (www.axa.de/datenschutz).

To what categories of recipients do we forward your personal data?

Intermediaries:

Insofar as you are looked after by an intermediary with regard to your insurance policies, your intermediary will process the application, policy and claims data required for the conclusion and implementation of the policy. Our company also transmits this data to your intermediaries to the extent that they require this information to support and advise you in matters of insurance and financial services.

Data processing within our group of companies:

Specialised companies or divisions of our group of companies perform certain data processing tasks centrally for the groups affiliated companies. If an insurance policy exists between you and one or more of the companies in our group, your data may be processed centrally by one of the companies in the group, for example, for the central administration of address data, for customer services by telephone, for processing contracts and benefits/claims, for collections and disbursements or for joint mail handling. Our list of service providers contains the names of the companies involved in centralised data processing.

External contractors and service providers:

In some cases we use external contractors and service providers in order to fulfil our contractual and legal obligations. You will find a list of the contractors and service providers with whom we have more than temporary business relationships in the attachment and on our website at www.axa.de/datenschutz.

Other recipients:

We may also transmit your personal data to other recipients, for instance government agencies, to satisfy statutory disclosure obligations, e.g. social insurance agencies, financial authorities or law enforcement authorities. If you are not the policyholder yourself in an insurance policy but an additional insured person, it may be necessary in certain individual cases to forward your personal data to the policyholder. The legal basis for the transfer of your personal data to the policyholder is Article 6 para. 1 b) and c) GDPR, the latter in conjunction with the statutory requirement such as Section 192 para. 8 sentence 1 VVG.

For how long do we store your data?

We erase your personal data as soon as it is no longer required for the purposes set out above. In this regard, it is possible that personal data may be retained for as long as claims can be raised against our company (statutory limitation period of three to thirty years). We also retain your personal data if we are required to do so by law. Relevant obligations to furnish evidence and data retention requirements are set out in the German Commercial Code (HGB), the Fiscal Code (AO), the Money Laundering Act (GwG) and elsewhere. This legislation can require storage periods of up to ten years.

What rights do you have?

You are entitled to demand information concerning the personal data retained about you. To do so, contact the address provided above. Moreover, you are entitled to demand the correction or erasure of your data, provided certain conditions are satisfied. You may also have a right to restrict the processing of your data and a right to have the data you have provided made available in a structured, common and machine-readable format.

Right to object

You have the right to object to the processing of your personal data for the purpose of direct marketing. Where we process your data for the protection of legitimate interests, you are entitled to object to this processing on grounds relating to your personal situation that override the right to data processing.



Do you want to complain about the treatment of your data?

You are entitled to contact the Data Protection Officer stated above or a supervisory authority for data protection to lodge a complaint. The data protection authority responsible for our company is:

Landesbeauftragte für Datenschutz und Informationsfreiheit NRW
Kavalleriestraße 2–4
40213 Düsseldorf

What other data sources do we use?

Exchanging data with your previous insurer

So that we can review and if necessary complete your data when an insurance policy is concluded or when an insured event occurs, personal data may be exchanged to the necessary extent with your previous insurer named in your application.

Creditworthiness information

Where it is necessary in order to protect our legitimate interests, we request information from the credit agency Creditreform Köln v. Padberg GmbH & Co. KG, Gustav-Heinemann-Ufer 68, 50968 Köln in order to assess your general payment record. Further information is supplied online at www.creditreform.de/koeln/datenschutz.

Exchanging data with your employer

If your employer takes out a group insurance policy with us on your behalf as an employee, it will register you with us, the insurer. In doing so, it will furnish us with details such as your name, address, date of birth and gender.

How do we transfer data to countries outside Europe?

Where personal data is transferred by us to a service provider outside the European Economic Area (EEA), this transfer shall only take place if an adequacy decision has been issued by the EU Commission in regard to the data privacy level in the third country or other appropriate data privacy guarantees (e.g. a company's internal, binding data protection policies or the use of EU standard contractual clauses) are in place. You may obtain detailed information in this regard and on the data privacy levels of our service providers under the contact details provided above.

Is automated individual decision-making a possibility?

Based on the risk information we ask you for when you apply for insurance, we will reach fully automated decisions such as whether to enter into or terminate the policy, about possible risk exclusions, or about the amount of insurance premium you are to pay. On the basis of the information you provide in the event of a claim and the data stored concerning your policy (including, where applicable, information received from third parties), we will reach fully automated decisions about our liability to perform, about bonuses and about additional services. The fully automated decisions are derived from rules that were previously laid down by the company regarding the weighting of such information: these rules are determined by actuarial criteria and calculations. Details concerning the logic involved and the consequences and intended effects of such processing depend on each individual case. Insofar as we perform automated individual decision-making in the cases described above, you have the right to obtain human intervention on the part of the controller, to express your point of view and to contest the decision. This right does not exist if your request has been granted in full. The legal basis for the performance of automated individual decision-making is Article 13 of the Code of Conduct of the Insurance Industry in conjunction with Article 40 GDPR, Section 37 BDSG and Article 6 para. 1 b) and f) or Article 9 para. 2 a) GDPR.





Overview of service providers of the AXA Konzern

As at 01/10/2025

Companies that are involved in the joint processing of data

<ul style="list-style-type: none"> – AXA Customer Care GmbH – AXA easy Versicherung AG – AXA Direktberatung GmbH – AXA Konzern AG – AXA Krankenversicherung AG – AXA Lebensversicherung AG – AXA Versicherung AG 	<ul style="list-style-type: none"> – AXA Services & Direct Solutions GmbH – AGER Lebensversicherung AG – Deutsche Ärzte Finanz Beratungs- und Vermittlungs-AG – Deutsche Ärzteversicherung AG – E.C.A. LEUE GmbH + Co.KG 	<ul style="list-style-type: none"> – Kölner Spezial Beratungs-GmbH für betriebliche Altersversorgung – ROLAND Rechtsschutz-Versicherungs-AG – winExpertisa Gesellschaft zur Förderung beruflicher Vorsorge mbH
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Companies whose main task is data processing (named individually)

All Group companies

Service provider	Object and purpose of the contract
ARA GmbH	Customer services helpline
AXA Assistance Deutschland GmbH	Customer services helpline
AXA Customer Care GmbH	Customer services helpline, customer care
AXA Group Operations Germany GmbH	Operation of data centre
AXA Group Operations SAS	Operation of Group-wide IT applications
AXA Konzern AG	Processing of applications, contracts, claims and recoveries support for intermediaries
AXA Logistik & Service GmbH	Processing of mail, applications, contracts and claims
AXA Services & Direct Solutions GmbH	Customer services helpline, customer care/processing of cases
GDV Dienstleistungs GmbH	Data transfer with intermediaries and service providers
GIE AXA	Hosting, data selection
unternehmen online GmbH & Co.KG	Operation of online applications (recording of proposals/applications for insurance)

AXA Krankenversicherung AG incl. branch DBV Deutsche Beamtenversicherung

Service provider	Object and purpose of the contract
IMB Consult GmbH	Medical opinions
MD Medicus Holding GmbH	Customer services helpline abroad, processing of foreign travel health insurance claims
ROLAND Assistance GmbH, Medical Contact AG, Sanvartis GmbH	Disease management
HMM Deutschland GmbH	Assessment of claims
ViaMed GmbH	Assessment of claims

AXA Lebensversicherung AG incl. branch DBV Deutsche Beamtenversicherung

Service provider	Object and purpose of the contract
Verisk Med GmbH	Requests for medical information
Fondsdepot Bank GmbH	Custody account management for fund policies
SP Consult AG	Processing of applications and claims, administration of existing policies





AXA Versicherung AG incl. branch DBV Deutsche Beamtenversicherung/branch Deutsche Ärzteversicherung/AXA easy Versicherung AG

Service provider	Object and purpose of the contract
Verisk Med GmbH	Customer services helpline
April Deutschland AG	Customer services helpline
AXA Assistance Deutschland GmbH	Disease management, providing motor vehicle insurance for credit card holders, administration of existing policies, processing of rental car insurance claims, technician and service provider network, recording of new claims
Inter Partner Assistance S.A.	Assistance services
ROLAND Assistance GmbH	Assistance services
Versicherungsforen medi-part GmbH	Processing of claims

Categories of service providers for whom the processing of data is not the main object of the contract and/or where the service is performed by many different service providers

All Group companies	
Category of service provider	Object and purpose of the contract
Address enquiry services	Checking of addresses
Archive	Storage of files
Underwriting agents	Underwriting services
Assistance coordinators	Assistance services
Investigators/accident analysts	Anti-fraud
Disposal companies	Disposal of waste
Experts/med. experts/consultants	Assessment of applications, claims, recoveries, counselling
Collection agencies/credit agencies	Processing of accounts receivable, proof of existence, credit reports, Notification and information system („HIS“)
IT service providers	Maintenance/operation/development of systems/applications/online services
Letter shops/print shops	Postal items/newsletter (email)
Marketing agencies/providers	Marketing campaigns
Market research companies	Market research, analyses of customer satisfaction
Law firms	Collection of accounts receivable, litigation, procurement of investigation files, other legal services
Rehabilitation service	Rehabilitation management
Repair and restoration companies, claims service providers, car hire companies	Repair of property damage and related services
Route planners	Claims processing/scheduling
Reinsurers	Monitoring
Service companies	Processing of claims and existing policies in bulk business (techn. insurance covers)
Customer services helpline	Temporary customer services in particular business processes, customer care
Agents/intermediaries	Processing of applications, benefits and claims, counselling

AXA Krankenversicherung AG

Category of service provider	Object and purpose of the contract
Suppliers of medical remedies and aids	Supply of medical remedies and aids

A current version of this overview of service providers can be found online at www.AXA.de/Datenschutz.

Please note: Should your personal situation conflict with the legitimate interests of the company and therefore its performing the contract, you can raise an objection by turning to us.

