

## Information on the use of your data (Privacy Policy)

Herewith we inform you about the processing of your personal data by the Zurich Insurance plc Niederlassung für Deutschland and the rights to which you are entitled under data protection law.

### Responsible Data-Controller

Zurich Insurance plc NfD  
Platz der Einheit 2  
60327 Frankfurt am Main, Germany  
Telefon: 069/7115-0  
Fax: 069/7115-3358  
E-Mail: [service@zurich.de](mailto:service@zurich.de)

### You can contact our Data Protection Officer:

Zurich Gruppe Deutschland  
Konzern Datenschutz  
50427 Köln, Germany  
E-Mail: [datenschutz@zurich.com](mailto:datenschutz@zurich.com)

### Origin and categories of personal data

In principle, we collect personal data directly from the data subject. In certain cases, however, we may receive personal data from third parties.

Examples:

- We may receive data from insurance-applicants via insurance agents, brokers, tipsters or online-sales-platforms.
- In the case of returned mail, specialized service providers carry out an address research in order to determine current address data.
- We receive data on co-insured or insured persons via our policyholder if we cannot collect the data directly from these persons. For example, we collect the name, address and date of birth. We collect the necessary data in the event of damage directly from the person concerned.
- We receive data on beneficiaries or beneficiaries from our policyholder. For example, the name, address and date of birth so that we can contact the person concerned in the event of a claim.
- In the case of motor vehicle insurance, we receive the data of a different keeper from our insurance policy holder and registration authorities, e.g. the name, contact details, vehicle data and date of birth.
- We may obtain information about guarantors, lenders, leasing providers, guarantee creditors and claim holders from our policyholder. Conversely, we may receive information about the policyholder from you, in particular contact details and information about the risk involved.
- We receive data on witnesses from our insurance recipient or involved third parties, e.g. investigating and prosecuting authorities. In this way we receive the

name, contact details and relevant information on the facts of the case.

- We also receive personal data about you via your responsible intermediary, e.g. as part of the application process.

### Purposes and legal bases of data processing

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG), the relevant provisions of the Insurance Contract Act (VVG) and all other relevant laws in Germany. In addition, our company has committed itself to the "Rules of Conduct for the Handling of Personal Data by the German Insurance Industry", which specify the above-mentioned laws for the insurance industry. These can be found in the internet under [www.zurich.de/datenschutz](http://www.zurich.de/datenschutz)

If you submit an application for insurance cover, we need the information you have provided for the conclusion of the contract and for the assessment of the risk to be assumed by us. If the insurance contract is concluded, we process this data to implement the contractual relationship, e.g. to issue a policy or invoice. We need information on the damage, for example, in order to be able to check whether an insured event has occurred and how high the damage is.

### The conclusion or execution of the insurance contract as well as the processing of claims is not possible without the processing of your personal data.

In addition, we need your personal data to create insurance-specific statistics, e.g. for the development of new tariffs or to comply with regulatory requirements. We use the data from all existing contracts with a Zurich company to examine the entire customer relationship, for example to provide advice, to adjust or supplement a contract, to make goodwill decisions or to provide comprehensive information. For the billing of sales force remuneration (e.g. commission of insurance agents, brokerage fee or remuneration of tipsters) the processing of personal contract data is necessary.

The legal basis for such processing of personal data for pre-contractual and contractual purposes as well as for claims processing is Art. 6 para. 1 b) GDPR. Insofar as special categories of personal data (e.g. your health data when taking out a life insurance policy) are required for this purpose, we obtain your consent in accordance with Art. 9 para. 2 a) in conjunction with Art. 7 GDPR. If we compile statistics with these data categories, this is done on the basis of Art. 9 para. 2 j) DSGVO in conjunction with § 27 BDSG.

We also process your data in order to protect legitimate interests of ourselves or third parties (Art. 6 Para. 1 f) GDPR. This may in particular be necessary

- to ensure IT security and IT operations,
- for an overall view of your customer relationship with the companies of the Zurich Group in Germany,
- to promote our own insurance products and other products of Zurich Group companies and their cooperation partners as well as market and opinion surveys, to the extent permitted by law,
- for the prevention and clarification of criminal offences, in particular we use data analyses for the recognition of indications that may indicate insurance misuse.

In addition, we process your personal data to meet legal obligations, such as regulatory requirements, commercial and tax retention obligations or our obligation to provide advice. In this case, the legal basis for the processing is the respective legal regulations in conjunction with Art. 6 Para. 1 c) GDPR.

Should we wish to process your personal data for a purpose not mentioned above, we will inform you of this beforehand within the framework of the statutory provisions.

### Categories of recipients of personal data

#### Reinsurer:

We insure risks assumed by us with specialised insurance companies (reinsurers). For this purpose, it may be necessary to transfer your contract data and any loss data to a reinsurer so that the latter can form its own opinion about the risk or the insured event.

It is also possible for the reinsurer to support our company in risk or loss assessment and in the evaluation of procedures on the basis of his special expertise. We only transmit your data to the reinsurer to the extent necessary for the fulfilment of our insurance contract with you or to the extent necessary to safeguard our legitimate interests.

#### Self-employed Field-Service:

If you are advised by an intermediary with regard to your insurance contracts, your intermediary will process the application, contract and loss data required to conclude and execute the contract. Our company also transmits this data to the intermediaries who are responsible for you, insofar as they require the information for your support and advice in your insurance and financial service matters.

#### Data processing in the group of companies:

Specialized companies or divisions of our Group perform certain data processing tasks centrally for the companies affiliated with the Zurich Group. Where an insurance contract exists with one or more companies in our

Group, your data may be processed centrally by a Group company for example for the central administration of address data, for customer service by telephone, for contract and claims processing, for collection and disbursement or for joint mail processing. In the overview of the service providers of the Zurich Group Germany in the current version on our Internet site at [www.zurich.de/datenschutz](http://www.zurich.de/datenschutz) you will find the companies that participate in centralized data processing.

#### External service providers:

We make use of external service providers to fulfil our contractual and legal obligations.

A list of the service providers, with whom we do not only have temporary business relationships, can be found on [www.zurich.de/datenschutz](http://www.zurich.de/datenschutz).

#### Further recipients:

In addition, we may transfer your personal data to other recipients, such as authorities to comply with statutory reporting requirements (e.g. social insurance carriers, tax authorities or law enforcement agencies).

### Duration of data storage

We will delete your personal data as soon as they are no longer required for the above-mentioned purposes. It may happen that personal data is stored for the period in which claims can be asserted against our company (statutory limitation period of three or up to thirty years). In addition, we store your personal data insofar as we are legally obliged to do so. Corresponding duties of proof and storage arise from the German Commercial Code, the Tax Code and the Money Laundering Act. The storage periods are thereafter up to ten years.

#### Your rights as a data subject

You can request information about the personal data stored about you at the above address. In addition, under certain conditions you can request the correction or deletion of your data. You may also have the right to limit the processing of your data and the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format.

#### **Right to object**

**You have the right to object to the processing of your personal data for purposes of direct marketing without stating reasons. If we process your data to safeguard legitimate interests, you may object to this processing for reasons arising from your particular situation. We will then no longer process your personal data unless we can prove that there are compelling legitimate grounds for processing which override your interests, rights**

**and freedoms or the processing serves the establishment, exercise or defence of legal claims.**

### **Right to complain**

You have the option of contacting the above-mentioned data protection officer with a complaint. You also have the right to complain to a data protection supervisory authority. The data protection supervisory authority responsible for us is:

Der Hessische Datenschutzbeauftragte  
Postfach 31 63  
65021 Wiesbaden

### **Information system for the insurance industry**

When concluding an insurance contract or within the scope of claims processing in property, liability or motor insurance, we transmit data on the insured object (vehicle identification data or address of the building) as well as personal details (surname, first name, date of birth, address, previous addresses) to informa HIS GmbH (HIS inquiry). informa HIS GmbH uses this data to check whether information about you and/or your insurance object is stored in the "Information and Information System of the Insurance Industry" (HIS) that may indicate an increased risk or irregularities in an insured event. Such information can only be available on the basis of an earlier report by an insurance company to HIS (HIS registration), about which you may have been informed separately by the registering insurance company. Data stored in HIS as a result of an HIS registration will be transmitted by informa HIS GmbH to us, the requesting insurance company.

Detailed information on informa HIS GmbH in accordance with Art. 14 GDPR, i.e. information on the business purpose, data storage purposes, data recipients, the right to self-disclosure, the right to deletion or correction, etc. can be found at the following link.

[www.informa-his.de](http://www.informa-his.de)

### **Credit reports**

Before taking out a motor insurance policy, we transfer your data (name, address and date of birth, if applicable) to infoscore Consumer Data GmbH, Rheinstraße 99, 76532 Baden-Baden, Germany, for the purpose of checking your creditworthiness. The legal basis for this transfer is Art. 6 Para. 1 f) GDPR. Transmissions on the basis of this provision will only take place if this is necessary to safeguard the legitimate interests of our company or third parties and does not outweigh your interests or fundamental rights and freedoms that require the protection of personal data.

Detailed information on infoscore Consumer Data GmbH pursuant to Art. 14 GDPR, i.e. information on

the business purpose, data storage purposes, data recipients, the right to self-disclosure, the right to deletion and correction, etc. can be found in Annex II and on the following website: <https://finance.arvato.com/icdinfob-latt>.

### **Data transfer to a third country**

If we transfer personal data to service providers outside the European Economic Area (EEA), the transfer will only take place if the third country has been confirmed by the EU Commission as having an adequate level of data protection or if other appropriate data protection guarantees (e.g. binding internal company data protection regulations or EU standard contract clauses) are in place. Detailed information on this and on the data protection level of our service providers in third countries can be found in the overview of the service providers of the Zurich Group Germany in the current version on our website:

[www.zurich.de/datenschutz](http://www.zurich.de/datenschutz)

### **Automated individual decision-making**

In motor insurance, we decide to some extent fully automatically on the scope of the insurance cover or the amount of the insurance premium. These decisions are based on rules that we have previously defined for weighting information about your previous payment behaviour, damage patterns or your customer relationship.

As far as we carry out automated individual case decisions, you have the right to obtain the intervention of a person on the part of the person responsible, to present your own position and to contest the decision if your request has not been fully granted.

### **Updating of the information on the use of your data**

This data protection notice may be amended at a later date due to changes, e.g. in legal provisions. You will receive a current version of these notices and of the service providers with whom you have not only temporary business relationships separately by company on our website: [www.zurich.de/datenschutz](http://www.zurich.de/datenschutz)