

# How we use your information

For insured





# Privacy – Data Protection

We care about your privacy and are committed to processing your personal information in accordance with fair information practices and applicable data privacy laws. This is information on how Zurich processes your personal data and on the rights you have as a data subject

## Definitions

**Personal Data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Zurich Insurance Europe AG, a public limited company incorporated in Germany, registered at the Register Court of Frankfurt a.M., under number 133359 and regulated by the Federal Financial Supervisory Authority (BaFin). Registered seat: Platz der Einheit 2, 60327 Frankfurt a.M.

### Zurich Insurance Europe AG, Belgian Branch

Corporate Village, Building Caprese  
Da Vincilaan 5  
1930 Zaventem  
Belgium

### Zurich Insurance Europe AG, Netherlands branch

Prinses Margrietplantsoen 63/65  
2595BR Den Haag  
The Netherlands

## Collection and use of Personal Data

We offer insurance solutions for companies. Depending on the type of insurance contract, this can be an insurance that covers a natural person. For example, the liability that the insured party has towards third parties and the D&O insurance that covers the responsibility of director of a company as a natural person. When an incident occurs, we, more specifically our claims department, are therefore required to collect personal data of the natural persons involved in the incident. We collect personal data either directly from the data subject or indirectly through their representatives (their insurers, lawyers,...) or through our insured or insurance broker or through public information such as websites.

The collection and processing of this personal data is required for the execution of our insurance contracts: for the management and execution of the contract and management and settlement of the claims resulting from the insurance contract. To this base are added the pursuit of legitimate interests: the provision and management of insurance services in general and the prevention of irregularities. To this base are added our legal obligations: amongst others the laws related to insurances.

The information we ask you to provide to us varies according to the insurance cover and the incident. It may include, but is not limited to

- **Personal identification information**, such as your name, home address, date of birth, gender, and home phone number;
- **Government-issued identification numbers**, such as national ID number;
- **Global financial overview**, such as payroll details, real-estate information;
- **Job-related information**, such as function, work location, work record;
- **Lifestyle habits**, such as hobbies
- **Family composition**, such as marital status, number of children.

If you do not provide this data, we may be unable to comply with our obligations and/or run our business and we will tell you about the implications of that decision.

## Sharing of Information

Zurich considers your personal data to be private and confidential. Zurich may sometimes disclose information about you to service providers (lawyers, doctors and experts) appointed by us, regulatory bodies, , other companies within the Zurich Insurance Group and our partners both inside and outside of the European Economic Area in connection with the purposes as mentioned above. This in respect with the applicable privacy laws. We do not rent or sell personal information to third parties.

## Access to and rectification of your Personal Data

Under the applicable data privacy laws, you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability. You are entitled to copies of your personal information held by us as data controller. We will provide you with a copy of the personal data kept by us as soon as may be practicable and in any

event not more than 30 days after the request in writing.

All requests should be addressed to the Data Protection Officer, at the address detailed below. If the information we hold about you is inaccurate, please let us know and we will make the necessary amendments and confirm that these have been made within reasonable time of receipt of your request. There is no fee for this.

You have the right to lodge a complaint to the local supervisory authority if you believe that we have not complied with the requirements of any applicable data privacy law with regard to your personal data. In the Netherlands the “Autoriteit Persoonsgegevens” and in Belgium the “Gegevensbeschermingsautoriteit”. for (other) complaints one can also turn to the (Belgium) Ombudsman (in the Netherlands referred to as ‘KIFID’) and the relevant Public Courts. Please note that Zurich Insurance Europe AG, Netherlands branch is a Member of the Netherlands Insurers Association (“Verbond van Verzekeraars”) and complies with the Code of Conduct for the Processing of Personal Data by Insurers (a.k.a. ‘GVPV’)

## Right to Access

Data subjects have the right to obtain from the controller:

- confirmation as to whether or not personal data concerning him or her is being processed and information are relating to such processing; and,
- A copy of the personal data

## Information about the Personal Data

With respect to personal data relating to the data subject, the Data Protection Officer is responsible to confirm whether the personal data of the data subject is being processed.

If personal data of the data subject is being processed, the response to a request for access must contain information on:

- The purposes of the processing;
- The categories of personal data concerned;
- The recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- Where possible, the envisaged period for which

the personal data will be stored, or, if not possible, the criteria used to determine that period;

- The existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- The right to file a complaint with the supervisory authority;
- Information on the appropriate safeguards where personal data is transferred to a third country or international organization.

## Security of Personal Data

Most of the data we collect is hosted on servers located in the European Union. However, because of our membership in the Zurich Group and the nature of our activities, which focus on the implementation of international insurance programs at the request of our customers, we are led to share the data we collect with recipients in different countries, including outside the European Union. When they exist, these data transfers to third countries are supervised in order to ensure an adequate level of protection, for example by through data transfer contracts.

We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect Data from unauthorized access, alteration, use, disclosure, accidental loss or destruction. Zurich will continue to revise policies and implement additional security features as new technologies become available.

## Retention Period

We will hold on to your personal data for as long as necessary for the purposes of the execution of insurance contracts and as to comply with legal and regulatory requirements.

We keep the personal data for the duration of the legal requirements applicable. These retention periods vary according to the type of guarantees provided for in the contract, the nature of the claims declared under it and, where applicable, the existence or not of legal proceedings in progress.

## Changes to the Privacy statement

Zurich reserves the right to change this Privacy statement from time to time in its sole discretion and in line with the applicable data privacy laws. When we do, we will also revise the 'last updated' date at the bottom of the privacy statement. We encourage you to periodically review this privacy statement to stay informed about how we are helping to protect the personal information we collect.

## Handling Privacy Concerns

If you have any questions about this notice or if you believe that your personal information is not handled in accordance with the applicable law or this notice, you have several options:

- Consult the Data Protection Officer  
Goddin Lee, DPO ZIE NL Branch  
[goddin.lee@zurich.com](mailto:goddin.lee@zurich.com)  
Zurich Insurance Europe AG, Netherlands  
branch Prinses Margrietplantsoen 63/65  
2595BR Den Haag

- Contact the Privacy Office at  
[privacy.netherlands@zurich.com](mailto:privacy.netherlands@zurich.com) or  
[privacy.belgium@zurich.com](mailto:privacy.belgium@zurich.com)

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