

# How we use your information

For Underwriting



# How we use your information

## Who controls your personal information

This notice tells you how Zurich Insurance Europe AG ('Zurich'), as data controller, will deal with your personal information. Where Zurich introduces you to a company outside the group, that company will tell you how your personal information will be used.

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

You can ask for further information about our use of your personal information or complain about its use in the first instance, by contacting our Data Protection Officer:

Goddin Lee, DPO Netherlands branch  
[goddin.lee@zurich.com](mailto:goddin.lee@zurich.com)  
Prinses Margrietplantsoen 65  
2595 BR Den Haag

If you have any concerns regarding our processing of your personal information, or are not satisfied with our handling of any request by you in relation to your rights, you also have the right to make a complaint to the local supervisory authority:

In the Netherlands the "Autoriteit Persoonsgegevens"  
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')

## What personal information we collect about you

We will collect and process the personal information that you give us by phone, e-mail, filling in forms, including on our website, and when you report a problem with our website. We also collect personal information from your appointed agent such as your trustee, broker, intermediary or financial adviser in order to provide you with the services you have requested and from other sources, such as credit reference agencies and other insurance companies, for verification purposes. We will also collect information you have volunteered to be in the public domain and other industry-wide sources. We will only collect personal information that we require to fulfil our contractual or legal requirements and the pursuit of our legitimate interests unless



you consent to provide additional information. The type of personal information we will collect includes; basic personal information (i.e. name, address and date of birth), occupation and financial details, health and family information, claims and convictions information and where you have requested other individuals be included in the arrangement, personal information about those individuals. If you give us personal information on other individuals, this will be used to provide you with a quotation and/or contract of insurance and/or provision of financial services. You agree you have their permission to do so. Except where you are managing the contract on another's behalf, please ensure that the individual knows how their personal information will be used by Zurich. More information about this can be found in the 'How we use your personal information' section.

### **How we use your personal information**

We and our selected third parties will only collect and use your personal information (i) where the processing is necessary in connection with providing you with a quotation and/or contract of insurance and/or provision of financial services that you have requested; (ii) to meet our legal or regulatory obligations; or (iii) for our "legitimate interests". It is in our legitimate interests to collect your personal information as it provides us with the information that we need to provide our services to you more effectively including providing you with information about our products and services. We will always ensure that we keep the amount of information collected and the extent of any processing to the absolute minimum to meet this legitimate interest. Examples of the purposes for which we will collect and use your personal information are:

1. to provide you with a quotation and/or contract of insurance;
2. to identify you when you contact us;
3. to deal with administration and assess claims;
4. to make and receive payments;
5. to obtain feedback on the service we provide to you;
6. to administer our site and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes;
7. for fraud prevention and detection purposes.

We will contact you to obtain consent prior to processing your personal information for any other purpose, including for the purposes of targeted marketing unless we already have consent to do so.

### **Who we share your personal information with**

Where necessary, we will share the personal information you gave us for the purposes of providing you with the goods and services you requested with the types of organizations described below:

- associated companies including reinsurers, suppliers and service providers;
- introducers and professional advisers;
- regulatory and legal bodies;
- survey and research organizations;
- credit reference agencies;
- healthcare professionals, social and welfare organizations; and
- other insurance companies



Or, in order to meet our legal or regulatory requirements, with the types of organizations described below:

- regulatory and legal bodies;
- central government or local councils;
- law enforcement bodies, including investigators;
- credit reference agencies; and
- other insurance companies

## **How we use your personal information for websites and email communications**

When you visit one of our websites we may collect information from you such as your email address or IP address. This helps us to track unique visits and monitor patterns of customer website traffic, such as who visits and why they visit.

We use cookies and/or pixel tags on some pages of our website. A cookie is a small text file sent to your computer. A pixel tag is an invisible tag placed on certain pages of our website but not on your computer. Pixel tags usually work together with cookies to assist us to provide you with a more tailored service. This allows us to monitor and improve our email communications and website. Useful information about cookies, including how to remove them, can be found on our websites.

## **How we transfer your personal information to other countries**

Where we transfer your personal information to countries that are outside of the European Union (EU) we will ensure that it is protected and that the transfer is lawful. We will do this by ensuring that the personal information is given adequate safeguards by using 'standard contractual clauses' which have been adopted or approved by the EU, or other solutions that are in line with the requirements of European data protection laws. A copy of our security measures for personal information transfers can be obtained from our Data Protection Officer at.

## **How long we keep your personal information for**

We will retain and process your personal information for as long as necessary to meet the purposes for which it was originally collected. These periods of time are subject to legal, tax and regulatory requirements or to enable us to manage our business.

## **Your data protection rights**

You have a number of rights under the data protection laws, namely:

- to access your data (by way of a subject access request);
- to have your data rectified if it is inaccurate or incomplete;
- in certain circumstances, to have your data deleted or removed;
- in certain circumstances, to restrict the processing of your data;
- a right of data portability, namely to obtain and reuse your data for your own purposes across different services;
- to object to direct marketing;
- to claim compensation for damages caused by a breach of the data protection legislation.
- if we are processing your personal information with your consent, you have the right to withdraw your



consent at any time.

## 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 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.

## What happens if you fail to provide your personal information to us

If you do not provide us with your personal information, we will not be able to provide you with a contract or assess future claims for the service you have requested.

## Fraud prevention and detection

In order to prevent and detect fraud we may at any time:

- check your personal data against counter fraud systems
- use your information to search against various publicly available and third party resources
- use industry fraud tools including undertaking credit searches and to review your claims history
- share information about you with other organisations including but not limited to the police, other insurers and other interested parties.

If you provide false or inaccurate information and fraud is identified, the matter will be investigated and appropriate action taken. You may face fines or criminal prosecution.

## Claims history

We may pass information relating to claims or potential claims to any relevant database.

We and other insurers may search these databases when you apply for insurance, when claims or potential claims are notified to us or at time of renewal to validate your claims history or that of any other person or property likely



to be involved in the policy or claim.  
This helps to check information provided and prevent  
fraudulent claims.

Last updated: **June 2022**

