

Data processing/data privacy policy fact sheet

Foreword

Today, insurance companies can only fulfil their tasks with the help of information technology (IT). This is the only way to process contractual relationships correctly, quickly and economically; IT also protects policyholders more effectively against abusive actions than previous manual procedures. The employees of Neodigital Versicherung AG are obliged to maintain confidentiality regarding personal data. This data will only be passed on to third parties if it is necessary for the execution of the contract. Such third parties are also bound to Neodigital Versicherung AG by agreements to observe user data protection.

The processing of your personal data disclosed to us is regulated in particular by the General Data Protection Regulation (GDPR).

Pursuant to this, data processing and use is permitted if the GDPR or another legal provision allows it or if the data subject has consented. The GDPR permits the processing and use of data if this is done within the scope of the purpose of a contractual relationship or a relationship of trust similar to a contract or insofar as it is necessary to protect the legitimate interests of the storing body and there is no reason to assume that the data subject's legitimate interest in the exclusion of the processing or use outweighs this.

Declaration of consent

Irrespective of this balancing of interests to be carried out in individual cases and with regard to a secure legal basis for data processing, a declaration of consent in accordance with the GDPR has been included in your insurance application. This declaration of consent in accordance with the GDPR also includes the consent to obtain and use address information, information on previous payment behaviour and creditworthiness information based on mathematical-statistical procedures using address data from Infoscore Consumer Data GmbH (ICD), Rheinstr. 99, 76532 Baden-Baden for the purpose of concluding and processing the contract, identifying persons and, if necessary, in the course of the active business relationship (e.g. in the event of a claim).

The declaration of consent is valid beyond the termination of the insurance contract, but ends – except in the case of accident insurance – with the rejection of the application or through your revocation, which is possible at any time. If the declaration of consent is deleted in whole or in part when the application is made, the contract may not be concluded. Despite revocation or a wholly or partially deleted declaration of consent, data processing and use may take place within the limited legally permissible scope as described in the foreword.

Declaration of release from confidentiality

In addition, the transmission of data that is subject to professional confidentiality, e.g. in the case of a doctor, also requires the special permission of the data subject (release from the duty of confidentiality). In accident insurance (personal insurance), therefore, a release from confidentiality clause is also included in the notice of claim/benefit.

In the following, we would like to give you some essential examples of data processing and use:

Data storage with your insurer

We store data that is necessary for the insurance contract.

First of all, this covers your information in the application (application data).

Furthermore, insurance-related data such as customer number (partner number), sum insured, insurance period, premium, bank details and, if necessary, the details of a third party, e.g. a broker (contract data) are stored. When an insured event occurs, we store your information on the

damage and, if applicable, also information from third parties, such as the degree of occupational disability determined by the doctor.

Each of your visits to the website of Neodigital Versicherung AG is stored in a log file for a limited time with the following data:

- date and time of retrieval
- request details and destination address
- name of the retrieved file and amount of data transferred
- message whether the retrieval was successful

This data is evaluated for statistical and security purposes as well as for optimising our website. There is no personal evaluation or profiling.

Notwithstanding this, we reserve the right to evaluate your IP address in the event of attacks on the internet infrastructure of Neodigital Versicherung AG.

Data transmission to reinsurers

In the interest of its policyholders, an insurer will always take care to balance the risks it assumes. Therefore, in many cases we surrender part of the risks to a reinsurer. This reinsurer also requires corresponding insurance-related information from us, such as policy number, premium, type of insurance cover, risk and risk surcharge, as well as your personal details in individual cases. Insofar as the reinsurer participates in the risk and loss assessment, it shall also be provided with the documents required for this purpose. In some cases, the reinsurers make use of other reinsurers to whom they also transfer corresponding data.

Data transmission to other insurers

Pursuant to the German Insurance Contract Act, the insured person must inform the insurer of all circumstances that are important for the assessment of the risk and the settlement of the claim when submitting the application, with every change to the contract and in the event of a claim. This includes, for example, previous illnesses and insured events or notifications of other similar insurance policies (applied for, existing, rejected or cancelled in the last 5 years). In order to prevent insurance fraud, to clarify possible contradictions in the information provided by the insured person or to close gaps in the findings on the damage incurred, it may be necessary to ask other insurers for information or to provide corresponding information in response to inquiries. In certain other cases (multiple insurance, statutory subrogation and in the case of sharing agreements), personal data must be exchanged between the insurers. In the process, the data subject's data is passed on, such as name and address, type of insurance cover and risk or information on the damage, such as the amount of the damage and the date of the damage.

Central information systems

When examining an application or a claim, it may be necessary to make inquiries of the competent trade association or other insurers for the purpose of risk assessment, further clarification of the facts or prevention of insurance fraud, or to answer corresponding inquiries of other insurers. For this purpose, there are central information systems that may be followed with the respective system, i.e. only insofar as certain conditions are fulfilled.

Examples:

Property insurer

Recording of damage and persons if there is arson or if the contract is terminated due to suspicion of insurance fraud and certain damage amounts have been reached.

Purpose: Risk assessment, damage clarification, prevention of further abuse.

Accident insurer

Notification in the event of a significant breach of the pre-contractual duty of disclosure, denial of benefits due to intentional breach of obligations in the event of a claim, faking an accident or the consequences of an accident, extraordinary termination by the insurer after benefits have been provided or filing of a lawsuit for benefits.

Purpose: Risk assessment and detection of insurance fraud.

Support through insurance brokers

Your insurance affairs will be handled by a broker. Brokers in this sense are not only individuals but also brokerage companies. In order to be able to properly fulfil his/her duties, the broker shall receive the information from us that is necessary to provide support and advice from your application, contract and benefit data, e.g. policy number, premiums, type of insurance cover and risk, number of insured events and amount of insurance benefits.

Exclusively for the purpose of contract adjustments in personal insurance, health data may also be transmitted to the competent broker. The brokers themselves process and use this personal data within the scope of the aforementioned advice and support of the customer. We will also inform you of any changes to customer-relevant data. Every broker is legally and contractually obliged to comply with the provisions of the GDPR, and with its special duties of confidentiality (e.g. professional confidentiality and data secrecy). In the event that your broker's brokerage relationship with our company ends, you will be informed of this.

Further information and explanations about your rights

We take care to comply with data protection provisions in all areas of our platform and our company. If you have any questions, you can also contact the company data protection officer directly:

Jens Gmerek
Solicitor
Wilhelm-Theodor-Römheld-Str. 14
55130 Mainz
E-Mail: jgmerek@gmerek-manthe.de

Under the German Data Protection Act, in addition to the right of revocation mentioned at the beginning, you as the data subject have a right of access and, under certain conditions, a right to rectification, blocking or erasure of your data stored in a file. For any further information and explanations, please contact our company's data protection officer at the above address. Please always direct any request for access, rectification, blocking or erasure of data stored by the reinsurer to us.