

Data processing/data privacy policy fact sheet

Foreword

It is not possible to process an asserted claim without processing personal data. Today, insurance companies can only fulfil their tasks with the help of information technology (IT). This is the only way to ensure correct, swift and economical processing of contractual relationships. Compared to the previous procedure, IT also provides the insured community with improved protection against improper acts. Employees of Neodigital Versicherung AG are sworn to secrecy regarding collected personal data and deal with such data in accordance with statutory data protection regulations and with this data privacy policy. This data may only be passed on to third parties under the following circumstances: (1) provided that it is relevant within contract fulfilment with respect to our policyholders or (2) insofar as it is required to check the claims of aggrieved parties (claimants). Such third parties are also bound to Neodigital Versicherung AG by agreements to observe data privacy for policyholder and claimant (hereafter: user). The processing of personal data disclosed to us regarding the user 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 affected user has consented. The GDPR permits the processing and use of data, provided that this takes place 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 user's legitimate interest in the exclusion of the processing or use outweighs this.

Addressees

This fact sheet is intended for the policyholder with whom the insurance contract was concluded and for the claimant asserting claims against Neodigital Versicherung AG due to an insured event with the policyholder. Both groups of persons are addressed below.

Declaration of consent

Regardless of any interests to be assessed in the individual case, and with regard to a secure legal basis for data processing, you give your consent to Neodigital Versicherung AG in accordance with the GDPR within the insurance application or when making contact, to assert your claims. 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 Infocore Consumer Data GmbH (ICD), Rheinstr. 99, 76532 Baden-Baden, Germany 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). This consent also includes permission to transmit your personal data in an unencrypted e-mail. During communication with unencrypted e-mails, it may be possible for third parties to read or manipulate any sensitive contents. The German Federal Office for Information Security recommends the use of e-mail encryption. The declaration of consent applies after the

insurance contract or the insured event has ended. However, it ends when an insurance application is rejected – although not in the case of accident insurance – and is also ended by your proper notice of revocation. If the declaration of consent is entirely or partially deleted when submitting an insurance application or making contact to report a claim, it may not be possible to conclude a contract or this may cause delays in communication when processing a claim. 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 affected user (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 with regard to the policyholder. Should a claimant be affected, an express declaration of release from confidentiality will be obtained in writing, or in electronic form, from Neodigital Versicherung AG.

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

Data storage at Neodigital Versicherung AG

We store the data required for the insurance contract, or for processing a claim. Initially, this refers to the specifications in the insurance application (application data) or user-specific information entered in the claim notification. Provided that the policyholder is affected, actuarial data such as the customer number (partner number), sum insured, insurance term, premium, bank details and any information required of a third party, e.g. insurance broker (contract data), a claimant, an appraiser or a lawyer, may be stored for the claim. When an insured event occurs, we store policyholder information for the claim and, if applicable, we also store information from claimants and other third parties, such as the degree of occupational disability determined by the doctor, details about injuries, etc.

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 and
- no-claim discounts.

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 and in order to ensure orderly claim processing, Neodigital Versicherung AG shall always pay attention to compensation of risks assumed by the company. Therefore, in many cases we surrender part of the risks to a reinsurer. This reinsurer also requires relevant actuarial or claim-related information from us. This information related to the policyholder can include insurance policy numbers, premium, type of insurance coverage, loss classes, claim total and specifications regarding the risk and risk surcharge amount, and may also include personal information 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

In case of a claim, users provide the insurer with all important information required to estimate the risk and process the claim. The same applies for the insured person with regard to the submission of applications and changes to contracts. This includes previous diseases and insurance claims, or notifications about other similar claims or insurances. In order to prevent insurance fraud, to clarify possible contradictions in the information provided by the user 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 enquiries. 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 associated with the affected user is passed on. This can include the name and address, type of insurance cover and risk, or information about the claim, such as the claim amount and the claim date.

Central information systems

When examining an application or a claim, it may be necessary to make enquiries 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 enquiries of other insurers. Central information systems have been created for this purpose. Inclusion in these information systems and their use take place solely for the purposes that may be pursued with the relevant system, i.e. only insofar as specific conditions have been met.

Examples:

Property insurer

Situation: 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 insurance

Situation: 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.

External service providers

In conjunction with switching insurer, confirmations of insurance from the German Federal Motor Transport Authority (Kraftfahrtbundesamt) and asserting claims, personal data may be forwarded to the responsible authority, GDV Dienstleistungs-GmbH, for processing there.

Communication via e-mail

In certain circumstances, it may be necessary for specific information to be sent via e-mail during contract initiation or claim settlement, for example. Therefore, Neodigital Versicherung AG uses a special secure mail server to send e-mails. This server is capable of sending these mails with the requisite level of encryption. It communicates with the target mail server and attempts to negotiate the best encryption procedure to secure the route of transport (perform encryption). If this fails, the system checks the next (weaker) procedure. If the target mail server does not support any of the encryption procedures, or if configuration is incorrect, these circumstances may lead to the e-mail being sent unencrypted. In this context, unencrypted means that the route of transport through the Internet is not secure. As explained above, affected users expressly consent to this unencrypted communication, if necessary.

Support through insurance brokers

Insurance brokers provide guidance and support to insured persons in matters of insurance. 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 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.

Our brokers themselves process and use this personal data within the scope of the aforementioned advice and support for the customer. Insured persons will also be informed about changes to customer-relevant data by Neodigital Versicherung AG. All brokers are legally and contractually obliged to comply with the provisions of the GDPR and with their special duties of confidentiality (e.g. professional confidentiality and data secrecy). Should it be the case that the brokerage relationship between an insurance broker and Neodigital Versicherung AG is terminated, the affected insured persons will be informed about this.

Further information and explanations about your rights

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

Rechtsanwalt Jens Gmerek

Wilhelm-Theodor-Römheld-Str. 14
55130 Mainz
Germany
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 affected user 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 (datenschutz@neodigital.de).