



Privacy statement Non-Life
Protection of your personal data

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Privacy statement – Protection of your personal data

Cf. General Data Protection Regulation of 27 April 2016.

Nationale-Nederlanden considers your privacy to be of great importance, which is why we treat your personal details with care. We take both visible and invisible measures to this end. In this privacy statement, you will find information about the way in which we deal with your personal information.

I What are Personal Data?

If you would like to take out a product with us, file a claim for damages or if you would like to receive advice from us about our products, we ask you for personal data, such as your name and address. Also when you visit our websites, we may collect personal data from you, such as your computer's IP address.

Personal data are information that tells us something about you or that we can relate to you. The collection, storage and use of your data are called the "processing" of your personal data. This is a legal concept. Nationale-Nederlanden complies with the relevant laws and regulations when processing your personal data. Below you will find the purposes for which we process personal data and what data these might be.

II. What are the reasons for processing personal data?

We only store and use your personal data for carefully defined purposes. In most cases, we receive personal data from you because you purchase or want to purchase one or more products from us. The law then speaks of data processing that is necessary for the preparation or implementation of an agreement. The bottom line is that we cannot help you as a customer if we do not have or cannot store information about you.

Your personal data are also used because we maintain central customer records, carry out marketing activities, want to prevent and combat fraud, or use the data for risk management. In the law, this is called "processing for legitimate interests". This can also be in your own interest because we can help you better and fight fraud. We also process your data in order to comply with our legal obligations. Below you will find more information about the basis on which we process your personal data.

a. To implement our agreements

- To be able to assess your product application.
- To be able to help you as a customer. So for entering into, managing and/or implementing our products. And/or for advising on our products.
- To provide and receive information to and from other parties if necessary in connection with the implementation of your product. Such a party could be your

insurance intermediary or your mortgage advisers for example. We inform your advisor, for example, if there is a delay in payment of the product.

b. On the grounds of a legitimate interest

➤ **For central customer administration**

Nationale-Nederlanden has a central customer administration. Our customer service uses this to see which products you have with us so that we can help you well and quickly. The data we use in our customer administration include your name, your date of birth, your address details, other contact details, information about the product(s) you have with us, payment data, marketing data and (in the case of insurance) claims data.

➤ **For marketing activities**

We use your data

- To respond better to your personal situation with our services. This could be by offering other products of ours that suit you.
- For analyses of personal data to improve the products and services offered and to better attune to the wishes of our customers and potential customers. We use these analyses, among other things, to create groups of customers with the same characteristics or behaviour (which we call profiles).
- To keep you informed via our website, the app, a letter or email.
- To give you a more personal experience on our websites and apps, or to offer advertisements on the websites of others that match your interests. See also our cookie statement.

Some marketing activities require your consent. This permission is always requested from you in advance, for example, when sending offers by email. If you have previously given your consent and wish to revoke it, you can do so very simply by clicking a link at the bottom of the email.

➤ **To combat fraud**

To protect your own security and that of financial institutions, we process personal data for risk management and to prevent and combat fraud.

To guarantee the safety and integrity of the Nationale-Nederlanden companies, we use a central events administration. Personal data relating to events that may be important and therefore require special attention can be included here. We have one event administration for all our companies. Data from the events administration is made available through our security affairs department for all companies that fall under Nationale-Nederlanden.

➤ **To better assess risks**

We process personal data for statistical analysis, in order to be able to assess risks better and determine the prices of our products accurately.

We store data to obtain the correct information in the case of a complaint or dispute.

➤ **Processing third-party data**

In some cases, we record the data of persons other than our customers, such as injured parties, administrators, beneficiaries and people who have given collateral for a customer. We only do this insofar as it is necessary for the implementation of the agreement with the customer.

c. **To comply with legal obligations**

Partly for your own security, we are obliged to request your personal data to determine your identity.

In exceptional cases, we are required to provide your personal data to other parties such as regulators, police, justice or intelligence services.

III Which personal data do we process?

➤ **Personal data that we receive from you to implement an agreement. This includes**

- General information such as your name, address, telephone number, email address and date of birth.
- Data that enable us to identify you.
- Your account number to receive payments from you or make payments to you.
- Financial data. We request this in some cases, such as when applying for a mortgage.
- Data that we need for a specific product, for example, a registration number for car insurance.
- We can request information about your past as a motorist for the risk assessment for non-life insurance policies.

➤ **Medical data**

The processing of data relating to your health may be necessary to settle a claim with injuries. If this is the case, we request in advance the specific consent of the person whose data we process.

➤ **Additional information**

These are extra data that we have not received from you or your adviser, but that we extract from (sometimes public) sources. Examples include accessing information to combat

terrorism and money laundering. We do this in some cases to assess risk or to comply with our legal obligations.

➤ **Contact history**

We record when you are in contact with us. With a view to improving the quality of services, training, coaching and assessment of employees, we record some telephone conversations. We can save recordings of conversations with you about your banking products as a record of our agreements. We also record the content of chats.

➤ **Visiting our websites and apps**

We record your visits to our websites or apps. For example, the pages you visited or which search you performed. This helps us improve how the site works and gives you a personal experience. We also use these data for marketing activities. We do this by placing cookies, among other things. You can find more information about the use of cookies in our Cookie Statement. We also process your IP address. This is the internet address of your computer, tablet or mobile device that is necessary to ensure that computers communicate safely with each other on the Internet.

IV From whom do we receive your personal data?

We receive most of your personal data from you or your financial adviser.

For non-life insurance policies, we also use the Datassur economic interest group (EIG). Datassur uses various (sometimes public) sources. With these, we assess the risk of fraud, default and claims and we examine whether the application complies with our acceptance rules.

We use public data and data from market research agencies to achieve even better insights into our customers and services. If we process personal data that we receive from third parties, we will only do so if you have given that party permission.

V To whom can we provide your personal data?

We may disclose your personal data to the persons, companies and agencies listed below. We only do this if:

- it is necessary for the implementation of the Agreement, or
- we have a “legitimate interest”, and the provision of your data is needed for this purpose.
- it is legally required to provide your data, or
- you have given your consent.

We only provide your data to one or more of the parties given below if any of the above reasons applies.

- Our employees, insofar as they need this information for their work.
- Companies to which we outsource work (“processors”). We authorise these companies to work on our behalf.
- Your adviser or representative.
- Medical advisers and labour experts.
- Companies that we involve in the settlement of a claim by providing expert services or repair and advice with non-life and income insurance policies.
- Companies that we engage in the assessment of a product application or a damage report.
- Public services such as supervisors, police and judicial authorities and the Tax Administrative services, if we are legally obliged to do so.
- Other banks and insurance companies.
- Bailiffs, debt collection agencies and/or notaries.
- The Datassur economic interest group.

VI Automated decision-making

For a number of products, such as the application for a car insurance policy or a life insurance policy, we assess the application via an automated process. In this process, we check whether you meet our acceptance criteria. We examine, among other things, whether the information you provided with your application about yourself or about the object you wish to insure is correct.

We also test a number of fraud indicators and make a risk assessment based on your data and data from other (sometimes public) sources. This assessment can have consequences for the level of your premium for insurance products or the interest rate of banking products. In the case of a fraud registration, one of our employees will always assess your application.

VII Safeguarding your personal data

We ensure good security

We devote a great deal of time and attention to the security of our systems and the personal data stored in them. Each business unit also has a dedicated team that monitors the security of personal data and how they are used. The security of our data traffic is monitored continuously. If something goes wrong, action is taken immediately. We solve and register data leaks. Indeed, it is our duty according to the law to do so. We also report them to the supervisor and you if necessary.

There is surveillance of how we process personal data

- The Data Protection Authority checks whether we comply with the GDPR.
- The Belgian Data Protection Authority for Belgian customers.

- The Authority for Consumers and Markets (ACM) supervises how we deal with cookies, direct marketing via electronic mail and the Do Not Call Registry.
- The Dutch Central Bank (DNB), the European Central Bank (ECB) and the Authority for the Financial Markets (AFM) generally supervise the financial sector and therefore also Nationale-Nederlanden.
- Internally, the Data Protection Officer supervises how we handle your personal data. For damage and liability insurance concluded in Belgium, this can be reached via dponl@nn.be.

Our employees

All our employees are aware of the rights and obligations related to data processing. We handle the data that you entrust to us with great care. Only authorised personnel may access and process your data.

VIII What are your rights?

As a customer, you have a number of rights regarding your personal data. These rights are explained below.

➤ **You have the right to inspection**

This means that you can request which of your personal data we have registered and what we use them for.

➤ **You have the right to correction**

You have the right to have your personal data changed if they are not correct. If your personal data are not correct, processed unlawfully or are no longer required for the purpose for which they were processed, you have the right to limit the processing of personal data. This means that you can indicate that your data must not be used temporarily. You have this right in the event that you object to the processing while your objection is still being processed.

➤ **You have the right to have data transferred**

This means that in certain cases you have the right to ask us to transfer the personal data that you have provided to us to yourself and/or another service provider.

➤ **You have the right to be forgotten**

You have the right to ask us to delete your personal data, but this is not possible if we are still using the data to implement an agreement.

➤ **You have the right to object**

You may object to the processing of your personal data if we use your personal data for purposes other than those necessary for the execution of an agreement or necessary for the fulfilment of a legal obligation. We carefully review your objection and stop processing your personal data if necessary.

➤ **Set your preference for offers**

You can always easily change your choice for receiving offers via email. You can do this by clicking the link at the bottom of the email or by informing us by telephone.

IX How long do we store your data?

We store the data as long as we are legally required to do so and as long as it is necessary for the purpose for which we use the data. This may vary from product to product. We base ourselves on the following rules:

➤ **Do you have a non-life or income insurance policy, such as car or home insurance or disability insurance?**

We keep your data for as long as you are a customer with us. This also applies if you are not a customer and we process your personal data for e.g. the settlement of claims. We retain the data until the applicable statutory limitation periods have expired. After the retention period, we only store data that are necessary for statistical purposes.

X Where do we process your data?

Your data are generally processed within the European Union (EU). In some cases, personal data are processed outside the EU. Some of our suppliers and cooperation partners are also located outside the EU or provide these services outside the EU. Legislation in these countries does not always offer the same protection of personal data as European legislation. In order to ensure that your personal data are nevertheless safe, we take measures in those cases by concluding agreements in which we make similar agreements about the security of personal data. Just as we do within the EU. These are called “EU model contracts”.

XI To which companies does this privacy statement apply?

The formal name is NN Group N.V. This includes the companies listed below. This privacy statement applies to these companies. These companies work together and share data with each other. If you are a customer with us, you may receive an offer from these companies.

- Nationale-Nederlanden Levensverzekering Maatschappij N.V.
- Nationale-Nederlanden Premium Pension Institution B.V.
- Nationale-Nederlanden Schadeverzekering Maatschappij N.V.
- NN Non-Life Insurance N.V.
- If you have taken out a damage or liability insurance policy at NN Non-Life Insurance NV in Belgium, the management and the claim settlement are carried out by NN Insurance Services Belgium NV
- Nationale-Nederlanden Bank N.V.
- Delta Lloyd Levensverzekering N.V.
- Delta Lloyd Schadeverzekering N.V.

XII Do you have any questions?

If you have any general questions about your personal data, please contact us at telecel-nonlife@nn.be.

You can exercise the above rights in principle free of charge by sending us a signed and dated request, together with a copy of the front and back of your identity card, to our Data Protection Officer.

Do you have a complaint about how NN Non-Life Insurance handles your personal data? You can submit it via telecel-nonlife@nn.be.

If you are not satisfied with the answer, you can contact the Belgian Data Protection Authority as a Belgian customer.

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