

Data protection notes

HDI Global SE

With this notice, we would like to inform you of how your personal data are collected and processed by the company specified below, and of the rights you enjoy under data protection provisions.

Company controlling the data processing

HDI Global SE
HDI-Platz 1
30659 Hannover

Telephone: 0511/645-0
Fax: 0511/645-4545

You can reach our Data Protection Officer by post at the address specified above by adding — Data Protection Officer / Group Data Protection — or by email at privacy@talanx.com.

Legal basis and purposes of data processing

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG), the provisions of the Insurance Contracts Act (VVG) of relevance to data protection laws as well as all further definitive laws.

If you request a quotation for an insurance product, we need the personal details you provide on the one hand to assess the risk we are being asked to assume as part of our risk review (including risk exclusion and increase), and on the other as part of our process of setting premiums.

If you submit an application for insurance cover, we need the personal details you provide on the one hand to assess the risk we are being asked to assume as part of our risk review (including risk exclusion and increase), and on the other as part of our process of setting premiums and the acceptance review required for the conclusion of an insurance contract. If the insurance contract is concluded, we process these personal data to execute the contractual relationship, particularly for drawing up the policy, carrying out clean-up audits, invoicing, collections/disbursements, reinsurance billing, billing third parties such as brokers, adjusting or optimising premiums, preventing fraud and carrying out checks prescribed in law.

If you make a claim for payment on occurrence of the contingency insured against, we need details of the damage as well as a description of the accident to enable us to verify whether the insured risk has occurred, the level of damage and whether a claim can be asserted as the policyholder may have breached his obligations which may lead to a reduced payment or exempt the insurer from any obligation to pay (e.g. breach of duty of disclosure before the contract was signed and/or by bringing about the accident through wilful and grossly negligent conduct).

It is not possible to conclude or execute the insurance contract without processing your personal data.

Beyond that, we need your personal data to produce actuarial statistics, e.g. for the development of new rates, to optimise existing ones or meet regulatory requirements. We

use the data from all contracts with the controller specified above to view the entire customer relationship, e.g. for providing advice with regard to a modification or amendment to the contract and/or for supplying extensive information.

Art. 6 (1 b) GDPR forms the legal basis for this processing of personal data for pre-contractual and contractual purposes. If special categories of personal data are required (e.g. your health data), we will obtain your consent in accordance with Section 9 (2 a) in conjunction with Art. 7 GDPR. If we prepare statistics using these data categories, this is done on the basis of Art. 9 (2 j) GDPR in conjunction with Section 27 BDSG.

We also process your data to protect our own legitimate interests or those of third parties (Art. 6 (1 f) GDPR). In particular, this may be necessary:

- to guarantee IT security and IT operations,
- for clean-up audits,
- for mail advertising of our own insurance products and other products from companies in the Talanx Group and their collaboration partners as well as for market research and opinion polls.
- to prevent and investigate criminal acts; in particular, we use data analyses to detect clues which may indicate insurance fraud.

In addition, we process your personal data to meet statutory obligations such as regulatory requirements, duties of retention under commercial and tax law or our advisory duties as well as to carry out checks required in law and comply with statutory requirements. In this case, the relevant statutory regulations in conjunction with Art. 6 (1 c) GDPR serve as the legal basis for the processing.

If we want to process your personal data for a purpose not specified above, we will inform you in advance in line with statutory provisions.

Categories of recipients of personal data

Depending on the particular branch of insurance and the specific case in hand, data may be sent to policyholders and co-insured parties, applicants and counterparties liable to recourse. If further insurers are sharing the risk, your personal data may be sent to them depending on the particular case.

Reinsurers

In the event that risks assumed by us are insured with special insurance companies (reinsurers), it may be necessary to send your contract data and if applicable your claim data to a reinsurer to enable them to form their own view of the risk or the claim. Furthermore, it is possible that the reinsurer will support our company on account of its specialist knowledge in verifying the risk or claim as well as in evaluating procedures. We will send your data to the reinsurer only to the extent required to fulfil our insurance contract with you, or to protect our legitimate interests.

Brokers:

If you are looked after by a broker with respect to your insurance contracts, your broker will process the application, contractual data and claims information required to conclude and execute the contract. Our company will also send such

data to brokers looking after you insofar as they require the information to support and advise you in your insurance and financial services matters.

Data processing in the Group:

Specialist companies or divisions within our Group perform certain data processing tasks on behalf of affiliated Group companies. If an insurance contract exists between you and one or more companies in our group, your data may be processed centrally by a company in the group, e.g. for the central administration of address data, telephone customer service, processing contracts and payments, collecting debts and making disbursements or for joint mail handling. You will find the companies participating in centralised data processing in our list of service providers.

External service providers:

In some cases, we use external service providers to meet our contractual and statutory obligations. Personal data are only passed on to service providers provided this is required for data processing purposes in each individual case.

You can find a list of contractors and service providers used by us with whom we have more than transitory business relationships, in the enclosed overview of service providers of HDI Global SE as well as in the latest version on our website at https://www.hdi.global/globalassets/_shared/_global/legals/dl-liste-hdiglobal-eng.pdf

Further recipients:

We may also send your personal data to further recipients such as authorities to meet statutory duties of disclosure (e.g. social security agencies, financial authorities or law enforcement agencies).

Length of data storage

We will delete your personal data as soon as they are no longer needed for the above-mentioned purposes. To enable us to defend claims, it is necessary to retain personal data for the length of time in which claims can be asserted against our company (statute of limitations of three or up to thirty years). In this case, the period of retention depends on the contractual and/or statutory period of limitation and the corresponding conditions of limitation. We also store your personal data for the period in which we are legally obliged to do so. Relevant burdens of proof and duties of retention can be derived from the Commercial Code, the Tax Code and the Money Laundering Act, to name but some. The retention periods ordained by these measures are up to ten years.

Rights of data subjects

You can request information on the data stored about yourself from the above-mentioned address. On certain conditions, you can also demand that your data be rectified or erased. You may also have the right to restrict the processing of your data as well as the right to have the data provided by you released in a structured, conventional and machine-readable format.

Right of objection

You have the right to object to the processing of your personal data for purposes of direct advertising. If we process your data to protect legitimate interests, you can object to such processing if there are reasons arising from your particular situation which oppose it.

Right of complaint

You have the option of approaching the above-mentioned Data Protection Officer or a data protection regulatory authority with a complaint.

The data protection regulatory authority responsible for us is:

Die Landesbeauftragte für den Datenschutz Niedersachsen
Prinzenstraße 5
30159 Hanover
Tel.: 0511 120-45 00
Fax: 0511 120-45 99
Email: poststelle@lfd.niedersachsen.de
<https://www.lfd.niedersachsen.de>

Notice and information system in the insurance industry

Data on the object insured (vehicle identification data or address of the building) as well as details about yourself (surname, first name, date of birth, address, former addresses) are sent to Informa HIS GmbH when an insurance contract is concluded (HIS enquiry). On the basis of these data, Informa HIS GmbH reviews whether information about you and/or the object insured by you is stored in the "Notes and Information System operating in the Insurance Industry" (HIS), and whether such information may imply a heightened risk or anomalies in the event of a claim. Such information can only be in the system as a result of an earlier report from an insurance company sent to HIS (HIS report) about which you may have been separately informed by the reporting insurance company. Data stored in HIS on the basis of an HIS report, are sent to us as the insurance company posting the enquiry by Informa HIS GmbH. You will find more information on HIS on the following website: www.informa-his.de. Contact details:

Informa HIS GmbH
Kreuzberger Ring 68
65205 Wiesbaden

You can find the latest version of more detailed data protection information regarding Informa HIS GmbH on our website at <https://www.hdi.global/legal/privacy/>.

Exchange of data with your former insurer

To enable us to check your details on the conclusion of an insurance contract (e.g. transferring a no-claims bonus for car insurance) or the information provided by you if a claim is made, and if applicable to supplement such information, it may be necessary to exchange such personal data with the former insurer specified by you in your application as is required.

Credit rating information

If necessary to protect our legitimate interests, we will ask a credit agency to provide information to enable us to assess your general payment behaviour.

Transfer of data to a third country

Should we transfer personal data to service providers outside the European Economic Area (EEA), such transfer will only be made if the EU Commission has confirmed that the third country has an appropriate level of data protection or if other suitable data protection guarantees are in place (e.g. binding in-house data protection rules or EU standard data protection clauses). You can request detailed information on such guarantees and on the level of data protection at our service providers in third countries using the contact details specified above.

Profiling and automated individual case decisions

Insofar as we use automated processes and digital assistance systems, this is generally done to support our internal processes and usually one employee is always involved in the processes and decisions. In some constellations, however, processes are also automated for fast and efficient processing.

We process your details and information on your insurance contracts in order to analyse certain aspects of our customer and contractual relationships and to estimate probabilities with regard to certain constellations (so-called profiling). In this way, we can make quick decisions based on your information in the following cases, for example (so-called automated individual case decision):

- Due to legal requirements, we are obliged to combat money laundering and fraud. In this context, data analyses are also carried out (e.g. in payment transactions). These measures also serve to protect you. We use evaluation tools to provide you with targeted information and advice on products. These enable needs-based communication and advertising, including market and opinion research.
- So-called score values can be used to assess your creditworthiness. In scoring, the probability that a customer will fulfil his or her payment obligations in accordance with the contract is calculated using mathematical procedures. Such score values thus support us, for example, in assessing creditworthiness, in decision-making within the scope of product transactions and flow into our risk management. The calculation is based on mathematically and statistically recognised and proven procedures. Information on nationality and special categories of personal data pursuant to Art. 9 GDPR are not processed.
- For effective risk and premium determination, we use calculated probabilities for certain types of behaviour, such as conclusion and cancellation behaviour, and also models for finer risk assessment.

The calculation of the probability values used for this purpose is carried out according to mathematically and statistically recognised and proven procedures. Technical and organisational measures as well as internal checking mechanisms ensure the correctness of the calculations. The automated decisions are based in particular on the contractual terms and conditions of our insurance products and the rules and limits derived from them.

Insofar as we carry out automated individual decisions, you have the right to intervene on the part of the person responsible, to express your own point of view and to contest the decision. In this way, you can have the result of the automated decision reviewed by our staff.

You have the right to object at any time to the processing of your data based on Art. 6(1)(f) GDPR (data processing on the basis of a balance of interests) or Art. 6(1)(e) GDPR (data processing in the public interest) if there are grounds for doing so that arise from your particular situation. This also applies to profiling based on this provision (scoring, if applicable) within the meaning of Art. 4 No. 4 GDPR.