

Privacy Statement

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ABN AMRO Verzekeringen and your personal data

This Privacy Statement explains how we handle your personal data. You can rest assured that we will handle it carefully.

Who is this Privacy Statement intended for?

If you are a customer of ours or have shown interest in a particular product, for example by making an application, we will process your personal data and this Privacy Statement will apply to you.

We may also process the personal data of people who do not have an agreement with us. This will apply to you, for example, if you were involved in a claim by one of our customers.

Who is responsible for your data?

ABN AMRO Verzekeringen is responsible for your data. This is the trading name for ABN AMRO Schadeverzekering NV, ABN AMRO Levensverzekering NV, ABN AMRO Assuradeuren BV and ABN AMRO Verzekeringen BV. This Privacy Statement applies to these four companies.

ABN AMRO Verzekeringen is a joint venture between NN Group NV and ABN AMRO Bank NV and is part of NN Group NV. For retail insurance ABN AMRO Bank acts as a broker. For commercial insurance ABN AMRO Verzekeringen itself (usually) acts as the broker.

What is personal data?

Personal data says something about you. The best-known examples of personal data are your name, address, e-mail address, age and date of birth. Your bank account, telephone number, IP address and citizen service number (BSN) are also personal data. Sensitive personal data is a separate category defined by law. It includes data concerning your health, for example.

What do we mean by 'processing of personal data'?

'Processing' is a term defined by law. We use it to mean collecting, storing and using your personal data. We process your personal data in compliance with the laws and regulations, including the provisions of the General Data Protection Regulation (GDPR) and the Insurers' Code of Conduct for the Processing of Personal Data.

Your data that we obtained from other parties

We also use data about you which we have not obtained from you. For example, we may also request data about you if your partner applies for insurance partly on your behalf. Some of that data may come from other sources. Examples include:

- Public registers containing your data, such as those of the [Netherlands' Cadastre, Land Registry and Mapping Agency](#) and the Chamber of Commerce.
- Public sources such as newspapers, the internet and public sections of social media.
- Records held by other parties that have collected data about you, such as market research and commercial information firms. In this context mention should be made of Stichting CIS, a foundation that manages an external registration system for insurers.

- Brokers and advisers you have used and through whom you are insured with us.
- Your employer. But only if you have a pension or loss of earnings insurance with us through your employer.

On what basis do we process your data?

Obviously, we are not permitted to request or use your data without good reason. The law states that we may only do so if there is a 'basis for processing'. Accordingly, we are permitted to use your data for one or more of the following reasons:

Contract

We will use your data to conclude and fulfil contracts with you, such as an insurance agreement. We need to use all kinds of data about you in order to implement the insurance agreement. Examples are your address, e-mail address, bank account number and date of birth. In some cases the data will also include your car registration number, your citizen service number (BSN) or the composition of your family. For some types of insurance (such as life and accident insurance) we also have to process medical data. We will obtain this data from you or – with your authorisation – from a doctor. Your medical data will be processed under the responsibility of the medical adviser (doctor). The medical adviser will only disclose medical data to other employees in our company if they require it to perform their work. In such cases these other employees will be bound by the same confidentiality obligation as the medical adviser based on medical confidentiality. To enable us to assess risk in non-life insurance, we may also request from you and process information concerning any criminal record you have.

Legal obligation

Insurers have to comply with many laws and rules. These are not only European or Dutch rules, but in some cases also other countries' rules. Those rules require us to process data about you, for example to obtain an accurate impression of you as a customer. We also take measures to combat fraud, tax avoidance, the financing of terrorism and money laundering. We will therefore also process your data in order to identify you.

Our or other parties' legitimate interests

We are also permitted to use your data if we ourselves have an interest in doing so. This is known as a 'legitimate interest'. Our interest in using your data must nevertheless outweigh your right to privacy. We therefore weigh up all interests.

The following are examples of cases where we have a legitimate interest in using your data:

- When we need to protect our own financial position and that of others, for example to prevent and combat fraud. This includes not only fraud committed against us, but also fraud against other financial institutions. We may therefore exchange data with those other financial institutions. We may also enter that data in our internal records or in an external register. When we wish to conduct a personal investigation in connection with a claim or insurance application, we do this in accordance with the Code of Conduct for Personal Investigations.
- When we are implementing an agreement. In some cases we will record data of persons other than our customers, such as injured parties, administrators, beneficiaries and people who have provided security on behalf of a customer. We will do so only to the extent necessary to implement the agreement with the customer.
- When we wish to improve our assessment of risks, continue developing our products and price our products appropriately, we will use your data for statistical purposes.
- When we need to obtain correct information in connection with a complaint or dispute.
- When we wish to improve our services. For example, when we aim to improve the efficiency of our record-keeping by centralising the administrative systems, wish to use external service providers or wish to conduct statistical and scientific research.

Someone else may also have a legitimate interest that requires us to use your data, for example if your car has been damaged and we have to settle the claim with the other party. We will then exchange data, such as your car registration number, with the other party's insurer.

Consent

In most cases we do not require consent to use your personal data. Such cases are where we use your data to carry out the agreement, where we are legally obliged to process personal data or where we have a legitimate interest in processing

your personal data. If we request your consent, we will explain why we need it. You can withdraw your consent at any time.

We will always request your consent in the following cases:

- Before we process your sensitive personal data, we will always request your consent unless the law states that we can or must use certain sensitive personal data without your consent.
- If we use automated decision-making and profiling and the law states that we must obtain your consent to do so.

Other purposes

We are permitted to use your data for purposes other than those for which you supplied it to us. The new purpose must nevertheless be consistent with the purpose for which you initially supplied it. In legal terms this is referred to as 'compatible use of data'.

Compulsory data

If we need your data to conclude an agreement with you and you are not willing to supply it, even though the law requires you to do so, we will unfortunately be unable to enter into an agreement with you or we will have to terminate an existing agreement with you. The forms (or online forms) that you occasionally have to complete will tell you which data is compulsory.

If you want us to delete your data from our systems, that is unfortunately not possible in the case of compulsory data. This is data that we require, for example to implement the agreement you have with us, because we are obliged to retain this data by law or because the insurer has a legitimate interest (see the explanation on page 2).

Camera images, telephone calls, chats and video chats

It is also possible to contact us by telephone, chat or video chat. We may also record your telephone calls or chats/video chats with our colleagues. We do that in order to:

- improve our services, for example to coach or assess our employees,
- comply with a legal obligation,
- supply evidence, or
- prevent fraud.

We handle such video and audio recordings with care. They are subject to the same rules as other personal data. You can exercise your rights, such as the right of access.

Other parties that use your data

In some situations we have to share your data with people and organisations involved in providing our services. You can read below who those are.

Our service providers

We sometimes also work with companies that help us provide services for you. This is known as outsourcing. There are special legal requirements for outsourcing by insurers. In some cases those companies also need your data in order to perform their work properly. We select those companies carefully. We enter into a contract that clearly states how they will handle your data. We ourselves remain responsible if we engage another company to work for us. We may use companies to process claims. We may engage an expert, for example, to investigate damage at the site of a fire, or a medical adviser to examine the physical consequences of an accident.

Our own group

Within NN Group NV, of which we are part, we are permitted to share your data for internal administrative purposes or to improve the services we provide for you.

Brokers

You may have purchased one of our retail insurance policies through a broker. Usually this is ABN AMRO Bank, but it may sometimes be another broker. Brokers process your personal data and are themselves responsible for using personal data. To find out more about the broker's handling of your personal data, please consult the broker's website.

Authorised public bodies

Government authorities such as the Tax Administration, the Public Prosecution Service, investigation services and our own supervisory authorities may request data. We are required by law to supply that data, which may also include data concerning you.

External registers

We may enter your data in external warning registers that can also be inspected by other financial service providers, for example in relation to a claim or fraud. You can read more about this warning system and how it works on the website of Stichting CIS (www.stichtingcis.nl).

Third parties with a legitimate interest

We may also disclose your data to third parties if they have an interest in our doing so. Your data will also be disclosed, for example, if your car is damaged and the claim has to be settled with the other party's insurer.

Use of your data for direct marketing

If you have previously purchased a product or service from us or requested information, we would like to offer you similar products and services that meet your requirements. To do that we will use personal data that we have obtained from you. We can also use personal data that we have obtained from other parties.

Profiling

As an insurer we use profiling. You can read why and when we do so below.

Combating fraud

We have extensive knowledge of and experience with combating fraud. Unfortunately we are encountering increasingly sophisticated types of fraud. To find out what practices or indications point to a certain type of fraud, we observe precisely what happens when insurance fraud is committed. That enables us to create a profile that we can use to identify and investigate certain activities more closely. We can then take measures to combat fraud as effectively as possible.

Client acceptance

Profiling may be used if you wish to purchase insurance from us. As an insurer we may use profiling, for example, to analyse risks when you apply for insurance (including online). Insurers know from experience that certain factors may indicate that a customer (or prospective customer) is more likely to suffer losses. When you apply for insurance, we will examine these factors and draw up a profile based on them.

Automated decision-making

For some types of insurance we will use an automated process to assess your application. On the basis of the information you supply, we will automatically assess whether you meet our acceptance criteria. We will check that the information you provide about yourself or the items to be insured are correct when you submit your application. We will also check fraud indicators and make a risk assessment based on your information and data obtained from other (public or non-public) sources. This risk assessment may have consequences for the level of your insurance premium. If a decision has been taken automatically, you can ask for it to be reconsidered by one of our employees. If there is a record of fraud, your application will always be assessed by one of our employees.

Securing your data

We do our utmost to protect your data. We invest a great deal in our systems, procedures and people. We ensure that our working methods are appropriate for the sensitivity of your data. We also train our employees to handle your data securely and they are required to treat it confidentially. Only employees who need to access your data to perform their work are permitted to do so. We constantly monitor the security of our data traffic. We take action immediately if anything goes wrong. We resolve and record any data breaches. We are obliged to do so by law. We report them to the supervisory authority and, if necessary, to you.

Your data outside Europe

Your data is generally processed within the European Union (EU). In some cases personal data is processed outside the EU. Some of our suppliers and cooperation partners are also based outside the EU or provide their services outside the EU. The regulations in these countries do not always offer the same protection of personal data as European regulations. In order to ensure that your personal data nevertheless remains safe, we take appropriate measures in such cases by entering into agreements containing comparable provisions on the security of personal data. In other words, just as we do within the EU.

How long do we retain your data?

The principle is that we will retain data as long as is necessary to fulfil the purpose for which we have obtained it.

The data retention period will depend on the following criteria:

- The General Data Protection Regulation includes no specific retention periods for personal data, although other laws may do so. We are then required to retain the data for the specified length of time. Examples include tax laws or legislation applying specifically to financial undertakings (Financial Supervision Act). In most cases we will retain your data for up to seven years after the termination of your insurance with us or up to seven years after the settlement of your claim.
- We may also become involved in a court case or other proceedings in the Netherlands or abroad. Among other things, we retain data in order to prove the circumstances of the case. We may retain data on file until any claim is time-barred and we can no longer be involved in any proceedings.

What rights do I have?

Rights of access, rectification and restriction and the right to be forgotten

You are entitled to request an overview of all the data we hold about you. This means you can enquire about the personal data we have recorded and the purposes for which we use it. If your data is incorrect, you can request us to rectify it. In some cases you can also ask us to erase your data. That is not possible in all cases, for example if we are required by law to continue holding your data. You can also request us to temporarily restrict the use of your personal data. You can do so if:

- You believe your personal data is incorrect.
- We are using your personal data improperly.
- We wish to destroy your personal data, but you still need it (for example after the retention period).

Right of objection

You can object to the processing of your personal data if you believe we are using it for purposes other than those necessary to carry out an agreement or to comply with a legal obligation. We will assess your objection carefully and if necessary stop processing your personal data.

Right of data portability

We can arrange for you to receive the data which you supplied to us and which we store in computerised form to implement an agreement. This is known as 'data portability'. You can also request us to send that data directly to another party.

Make sure your data is secure

Check whether the party to which you wish to supply your data can be trusted and will handle your data as securely as we do. If you want us to send you your data, make sure your own equipment is sufficiently secure and has not been or cannot be hacked, for example. Your financial data may be of great interest to criminals.

Exercising your rights

If you wish to exercise any of the above rights, you can send a written request to dpo@abnamroverzekeringen.nl. Your request must include your name, address, telephone number, policy number and a copy of a valid identity document in which the citizen service number (BSN) and passport photograph have been redacted.

When submitting your request, please also let us know the background so that we can help you as effectively as possible.

What to do if you have a complaint or anything is unclear

Our company has a data protection officer, who can be contacted at dpo@abnamroverzekerings.nl. Please contact our data protection officer if you have any questions concerning the Privacy Statement. You can also submit a complaint to dpo@abnamroverzekerings.nl if you disagree with the way we handle your data. Of course you also have the right to submit a complaint to the Dutch Data Protection Authority (www.autoriteitpersoonsgegevens.nl).

Amendments to the Privacy Statement

Changes may occur in the way we use personal data due to changes in laws and regulations or changes in our services and products that have direct consequences for our use of your personal data. In such cases we will amend the Privacy Statement.