

# Privacy Statement for Brokers

Version: 01.03.2021

wefox

## 1. Who is the controller under data protection law and whom can you contact?

The controller for the processing of personal data (referred to below in short as “data”) is:

wefox Insurance AG  
Aeulestrasse 56  
9490 Vaduz  
Liechtenstein

## 2. How can you contact the data protection officer of wefox Insurance AG?

You can contact our data protection officer at the following address:

wefox Group Services (GER) GmbH  
Data Protection Officer  
Urbanstr. 71  
10967 Berlin  
Germany  
Email: [dataprotection@wefox.com](mailto:dataprotection@wefox.com)

## 3. What are the purposes for which we process your data?

We process your personal data in compliance with the General Data Protection Regulation (referred to below as “GDPR”), the relevant national provisions and all other relevant laws.

### 3.1. To fulfil our contractual duties

Your personal data is processed in order to carry out transactions and services as part of the performance of our contracts with you, your and our clients or to carry out pre-contractual measures. We process your data as part of the initiation of business to conclude or perform the cooperation agreement / the brokerage fee commitment / commission agreement. If you submit a proposal for insurance cover for your client, we require your data to verify your licence and the scope of your licensed activities and a copy of your ID card to identify you. We use your contact details for printing on the client correspondence and also for direct correspondence between you and our firm for business transactions, such as to follow up payment reminders, warnings, cancellations, contract amendments, etc. for example. We also process your data in the course of mailing campaigns. We store your data for this purpose in our sales management system and inventory system.

It is not possible to conclude or perform the cooperation agreement / the brokerage fee commitment / commission agreement without processing your personal data.

### **3.2. As part of the balancing of interests**

We also process your data to safeguard our own or third-party legitimate interests. This may be required in particular: to guarantee IT security and IT operations; to prevent and investigate criminal acts, for example through so-called scoring, in particular we use data analysis to identify information that may indicate insurance fraud; to use it for testing new and further developments of our processing software. We also process your data in order to advertise our insurance products and for market and opinion surveys. We also use your data for financial control purposes for revenue statistics. These statistics are partly for internal analyses, but we also provide the statistics to sales managers. Other transactions in which we process your data include assessments of claims and complaints (claims controlling and complaints management), as well as in the case of portfolio transfers.

### **3.3. Based on statutory regulations**

In addition, we process your personal data in order to comply with legal obligations, such as for example regulatory requirements, and retention obligations under commercial and tax law.

If we wish to process your data for a purpose other than those stated above, we shall inform you of this beforehand in accordance with the statutory regulations.

## **4. Who receives your data?**

Depending on the type of data processed within wefox Insurance AG, only specific organisational units have access to your data. These are the specialist departments involved in the performance of our services. A roles and authorisation concept restricts access within our company to those roles and to the scope required for the specific purpose of processing.

We also transfer your data to third parties to fulfil the purposes specified under section 3. The categories of these recipients are broken down as follows:

### **4.1. Data processing within the corporate group:**

Your data is transferred to affiliated companies, in particular to the authorised specialist departments of wefox Group Service (GER) GmbH and to FinanceFox Services BCN S.L.

### **4.2. External service providers:**

We sometimes use external service providers to fulfil our contractual and legal duties. These service providers may therefore receive data for these purposes, providing they maintain confidentiality and comply with our instructions under data protection law.

### **4.3. External service providers established in a third country (outside the EU and Switzerland):**

Some of our service providers are completely or partially established in so-called third countries, i.e. outside the EU and Switzerland. For some of these third countries there is no adequacy decision under Art. 45(3) GDPR in place. The same applies in relation to appropriate safeguards as defined in 46 GDPR. The transfer of your data to these service providers is carried out in accordance with Art. 49(1)(a) and (b) GDPR.

### **4.4. Other recipients:**

We may also transfer your data to other official or non-official bodies, such as to authorities to comply with our statutory verification and/or disclosure duties (e.g. law enforcement authorities).

## 5. Duration of data retention

We erase your personal data as soon as it is no longer required for the purposes stated above. However, it may also be the case that personal data is stored for the period during which claims may be made against our company (statutory limitation period of three or up to thirty years). We also store your personal data where we are obliged to do so. The relevant proof and retention obligations derive, inter alia, from the Commercial Code, the Fiscal Code and the Money Laundering Act. The storage periods under these amount to up to ten years.

## 6. Data subject rights

You can demand information about the data stored about you from the address given above. In addition, under certain conditions you can also demand the rectification or erasure of your data. You may also have a right to restrict the processing of your data and a right to the return of the data provided by you in a structured, commonly used and machine-readable format.

If processing of your data is carried out on the basis of your consent, you have the right to withdraw your consent without affecting the lawfulness of the processing carried out based on your consent up to the time of its withdrawal.

## 7. Right to object

You have the right to object to processing of your data for direct marketing purposes. An email to [dataprotection@wefox.com](mailto:dataprotection@wefox.com) will suffice for this.

If we process your data to safeguard legitimate interests outside the purpose of direct marketing, you can object to such processing if there are reasons arising from your specific situation against the data processing. We will then no longer process your personal data, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing is used for the establishment, exercise or defence of legal claims.

## 8. Right to lodge a complaint

You have the option of lodging a complaint with the data protection officer specified above or with a supervisory authority for data protection.

The competent supervisory authority for data protection for us is:

Data Protection Office of the Principality of Liechtenstein  
Städtle 38, PO Box 684  
9490 Vaduz  
Liechtenstein  
T +423 236 60 90  
Email: [info.dss@llv.li](mailto:info.dss@llv.li)