

Data 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 within the meaning of the European General Data Protection Regulation (hereinafter referred to as “GDPR”) 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

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

We process your personal data (hereinafter referred to as “data”) in compliance with the GDPR, the Federal Data Protection Act (BDSG), the provisions of the Insurance Contract Act (VVG) relevant to data protection law and all other relevant laws.

3.1. For the fulfilment of contractual obligations, Art. 6 para. 1 b) GDPR

Your personal data is processed to carry out transactions and services as part of the performance of our contracts with you as well as 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 apply for insurance coverage for your client, we need your Chamber of Industry and Commerce (IHK) registration number to check your admission and the extent of your authorised activity and a copy of your identity 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, Art. 6 para. 1 f) GDPR

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 data to fulfil legal obligations such as regulatory requirements and/or commercial and tax retention obligations. The legal basis for this processing is the respective legal regulations in conjunction with Article 6 (1) c) BDSG.

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 also 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):

Some of our service providers are completely or partially established in third countries, i.e. outside the EU. 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 on the basis of Art. 49(1) a) and b) GDPR.

4.4. AVAD

We use the AVAD and its information traffic to check and report on business initiation and in certain cases where there is a legitimate interest, postal address: Auskunftsstelle über Versicherungs-/Bausparkassenaußendienst und Versicherungsmakler in Deutschland e.V., 21071 Hamburg.

You can find additional information about AVAD at https://www.avad.de/pdf/Informationsblatt_Vermittler.pdf.

4.5. Other recipients:

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

5. Duration of data retention

We erase your personal data as soon as they are no longer required for the purposes stated above. However, it may also be the case that personal data are 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 suffices 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:

wefox

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

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