

Tryg's Personal Data Policy

Updated May 25th 2018

Tryg Forsikring A/S ('we') is the data controller of any personal data we process.

The object of our Personal Data Policy is that you feel peace of mind in relation to how we process your personal data. Here, you may find information about whom we process data about, which data we collect, which sources we collect data from, whom we share the data with, and for how long we store the data.

We are subject to an obligation of professional secrecy

We are subject to an obligation of professional secrecy under the Danish Financial Business Act (Lov om finansiel virksomhed) and we treat your personal data confidentially. The obligation of professional secrecy also applies between the employees at Tryg. We do not pass on your personal data, unless you have given your consent to this, or we have another legal basis for such disclosure pursuant to the Danish Financial Business Act and the personal data protection legislation.

How we process personal data depends on the purpose of our processing activities.

In Part I, you can read about how we process personal data about you when we

- A Prepare a quotation or draw up an insurance policy
- B Handle claims
- C Investigate suspected fraud and otherwise manage insurance contracts
- D Market products to you

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I. How we process personal data about you when we

A. Prepare a quotation or draw up an insurance policy

When we prepare a quotation or enter into an insurance contract, we will process data about the party who takes out the insurance (the policyholder) as well as about other persons who are covered by the insurance; see Article 6(1)(b) (necessary for the performance of a contract) and Article 6(1)(f) (legitimate interests) of the General Data Protection Regulation.

Categories of data subjects in our systems may be:

- The policyholder
- The insured (typically spouses/cohabitants, children and the insured under group insurance policies such as employer-paid health insurance)
- Beneficiaries
- Representatives/contacts
- The owner/user of an insured item

Categories of personal data we collect, use and process

We collect and use only the data necessary to enter into, manage and perform the contract. The data we process in connection with quotations and the drawing-up of insurance policies will depend on the type of insurance in question. We do not request data concerning health in connection with quotations and the drawing-up of insurance policies.

Categories of personal data may be:

- Contact details (e.g. name, address, email and telephone number)
- Date of birth and, if necessary, civil registration (CPR) number in order to identify you
- Payment details
- Insurance data about you or the insured item (e.g. employment, registration number, data about your previous similar insurance policies and claims with other insurance companies)
- Connection to our partners and, if relevant, trade union membership if you take out insurance through a member organisation, bank, association, employer or other parties with connected discounts and other advantages

We request your consent to process your civil registration number and, if relevant, trade union membership.

Collection and disclosure of personal data

Sources of data and categories of data recipients may be:

- The policyholder
- The Central Office of Civil Registration (Det Centrale Personregister) (to update address and for opt-out registration for unsolicited advertising)
- Virk.dk (to update address and for information about opt-out registration for unsolicited advertising)
- BBR (your real property)
- DMR (Digital Motor Register)
- Bilstatistik.dk (information about motor vehicles)
- Automobile insurance companies' joint register
- Other insurance companies
- Partners, including trade unions, which entitle you to discounts and other advantages
- Partners and suppliers which assist us in the management and performance of your insurance contract
- Employers and pension providers (for registration under group insurance policies)
- Representatives/contacts

In some cases, we obtain data about your insurance policies from your current and previous insurance companies and exchange data with partners which entitle you to discounts and other advantages. We request your consent to do this.

Storage

We store personal data for as long as this is necessary to meet the purpose of our processing activities. This means that we store data in the period in which we can be met by a claim, are obliged to store data under current legislation (e.g. the Danish Bookkeeping Act (Bogføringsloven) and the financial supervisory legislation) or have another legitimate data storage purpose.

We store quotations to private individuals for up to six months if you do not accept the quotation. If you take out an insurance policy, we generally base our data storage on the absolute limitation periods laid down in the Danish Limitations Act (Forældelsesloven) of 10 and 30 years, respectively, from termination of the policy in the event that a subsequent claim is brought. We also store the policy for as long as we have registered a claim.

B. Handling of claims

When we handle claims under private, business and group insurance policies, we only register personal data which is necessary to process the claim and assess the compensation payable under the claim; see Article 6(1)(b) (necessary for the performance of a contract), Article 9(2)(f) (establishment, exercise or defence of legal claims), and Article 6(1)(f) (legitimate interests) of the General Data Protection Regulation.

Categories of data subjects in our systems may be:

- The policyholder
- The insured, for example spouse/cohabitant and children or insured under group insurance policies
- Beneficiaries
- The claimant
- The tortfeasor
- Counterparties
- Witnesses
- Partners and treatment providers
- Representatives/contacts

Categories of personal data we collect, use and process

During our claims handling, we process and register only the data necessary to assess the claim. This will depend on the specific case.

Categories of personal data may be:

- Contact details (e.g. name, address, email and telephone number)
- Date of birth and, if necessary, civil registration (CPR) number in order to identify you
- Payment details
- Matters pertaining to employment contexts
- Insurance data (on current and previous insurance policies with other insurance companies about types of claims, details pertaining to the processing of specific claims, compensations paid, claims documentation and date and reason for termination)
- Information about the damaged item (e.g. age, purchase price and examination results)
- Events occurred in connection with the damage or loss (e.g. analysis, reconstruction of an accident, loss adjuster's report and police reports)

- Data about health, illness and contacts with health care services
- Salary and social and financial circumstances (for calculating indemnity for a claim)
- Photos, film and telephone recordings of the damage

Collection and disclosure of personal data

We will disclose only the required personal data when this is necessary to enable us and our partners to process your claim, or if we are legally bound to do so (e.g. reporting of current claims disbursements to SKAT (the Central Customs and Tax Administration)).

Sources of data and categories of data recipients may be:

- The policyholder
- The insured (typically spouses/cohabitants, children and insured under group insurance policies)
- Beneficiaries
- The claimant
- The tortfeasor
- Witnesses and secondary parties
- Partners and suppliers which assist us in the administration, handling and repair of damage (e.g. loss adjusters, workshops, tradesmen, emergency call centres and carriers)
- Treatment providers, e.g. physicians, specialists, dentists, psychologists, physiotherapists et al.
- Labour Market Insurance
- Public authorities such as municipal authorities, SKAT and the police
- Appeals boards and courts
- Other insurance companies (e.g. in connection with recourse)
- Mortgagees
- Representatives/contacts

In personal injury claims cases, the informed consent form that you sign contains information about the sources whom we may obtain information from and the parties which we may disclose data to. This may be specialists who are to prepare a specialist medical certificate, current and previous municipalities of residence, Labour Market Insurance and other expressly specified recipients.

Storage

We store personal data for as long as this is necessary to meet the purpose of our processing activities. This means that we store data in the period in which we can be met by a claim, are obliged to store data under current legislation (e.g. the Danish Bookkeeping Act (Bogføringsloven) and the financial supervisory legislation) or have another legitimate data storage purpose.

As a general rule, we store claims in accordance with the absolute limitation periods of 10 and 30 years, respectively, from when the notice of claim was filed in the event that the claim is resumed.

C. Investigate suspected fraud and otherwise manage insurance contracts

Investigate suspected fraud

We have a legitimate interest in verifying that we pay the compensation to which the claimant is entitled and that our customers do not pay higher premiums due to insurance fraud; see Article 9(2)(f) (establishment, exercise or defence of legal claims) and Article 6 (1)(f) (legitimate interests) of the General Data Protection Regulation.

You can read about our data processing in cases in which we investigate suspected insurance fraud at <https://tryg.dk/om-tryg/forsikringssvindel>. We follow the code of conduct of the industry organisation Forsikring & Pension (the Danish Insurance Association). In addition to the data and sources which normally form part of our claims handling, we also obtain data from publicly accessible profiles on social media in accordance with the guidelines laid down in the code of conduct.

Pay out bonuses

As a policyholder in Tryg, you are also a member of TryghedsGruppen. Under certain circumstances, members receive bonus payments calculated on the basis of insurance covers with Tryg. To enable TryghedsGruppen to pay a bonus to you, we disclose your name, address and civil registration number/CVR number.

Manage non-payment

If you default on your payment obligations to Tryg, we may report you to credit rating agencies or warning registers in accordance with the current legislation.

Process data for statistical purposes and analyses

We use your data for studies and analyses to improve our products, services, offers, counselling and technical solutions. We use statistics and analyses to monitor profitability, prepare insurance tariffs and calculate insurance premiums, insurance provisions, solvency and reinsurance. Our obligation to do so is laid down in, among other provisions, the rules in the legislation on financial supervision, including the Danish Financial Business Act, the Solvency II Regulation and the Regulation on requirements for product supervision and control for insurance companies and insurance distributors.

D. Market products to you

Through our marketing, we provide information about news, benefits and offers of insurance products and loss prevention products; see Article 6(1) (f) (legitimate interests) of the General Data Protection Regulation.

We collect, among other information, data from the public telephone directory and other public registers, competitions in which you participate, and from partners where you are a member/customer or where you have another connection which entitles you to special discounts and advantages.

Before we market our insurance products to you, we check that you have not opted out of direct marketing from us or are registered on the Robinson list.

You can always object to our marketing by contacting us on + 45 70 11 20 20.

II. How we protect your personal data when we

E. Communicate by email

When we send you emails containing your civil registration number or sensitive personal data, we encrypt your email.

Please note that if you send emails to us, we cannot guarantee confidentiality and use of encryption, as this will depend on your service provider.

Read more about being a digital customer at <https://tryg.dk/digital>.

F. Process your data digitally

When you visit our website, we use cookies. You can read our cookies policy for further information, including how you disable the tracking of cookies at <https://tryg.dk/om-tryg/cookiepolitik>.

When you fill in a contact form, buy an insurance policy, obtain a quotation or file a notice of claim online, we register the data you give us. Your notice of claim will be encrypted. We store the data for as long as they are needed in accordance with our general guidelines for data storage.

On My Page and My Business – your personal self-service universe – you can find information about your current insurance policies and claims. Read more about being a digital customer at <https://tryg.dk/digital>.

If you write to us through the chat function on our website, we register the information you give us to enable us to answer your enquiry. The chat function is encrypted, and we delete the conversation after three months. We store the data that we need in accordance with our general guidelines for data storage. We recommend that you do not chat with us about matters involving the processing of sensitive personal data, and that you instead call us on + 45 70 11 20 20.

If you write to us via Facebook, we cannot encrypt, protect, rectify or delete your data. We therefore recommend that you instead call us on + 45 70 11 20 20.

When you use our applications (apps), you can read more about our data processing in the conditions for the respective application that you use.

G. Experience personal data breaches

We have a responsibility to report to the Danish Data Protection Agency data breaches that occur with us and our data processors. Our data processors work under our instructions and are subject to our requirements for organisational, technical and security measures. If we experience a personal data breach, we are obliged to report the breach to the Danish Data Protection Agency within 72 hours in accordance with the personal data protection legislation.

If the personal data breach is likely to result in a high risk to natural persons' rights and freedoms, we are also obliged to inform you directly. We will do this by telephone, email, text message, at our website or through the press, depending on the available contact details for the persons affected by the situation and the seriousness of the data breach.

If you erroneously receive a letter or an email addressed to one of our other customers, you can report this by email to tryg.sd@tryg.dk.

H. Disclose personal data to other parties

We do not disclose your personal data to other parties unless you have given your consent, or we have another legal basis for such disclosure pursuant to the Danish Financial Business Act and personal data protection legislation.

We disclose only the required personal data when necessary, for example to perform and manage your insurance contract, process your claim(s), or if you wish to use your affiliation to a partner to obtain a discount and other advantages.

Our partners can act as our auxiliary arm and work under our instructions (data processors), or they can act as independent data controllers, just like us.

We use data processors for development, hosting, support and operations, among other activities. When we enter into an agreement with a data processor on the processing of your personal data on our behalf, we attach importance to ensuring that the data processor is also able to process your personal data in a secure manner and in accordance with applicable legislation. We therefore perform a risk assessment of our data processors before entering into an agreement with them and disclosing your personal data to them.

When our partners are independent data controllers like us, they are also obliged to meet your wishes regarding the exercise of your personal data rights (see below).

I. Transfer data to third countries

We use data processors and sub-processors outside the EU/EEA in connection with technical IT development, hosting, support and operations. Furthermore, there may be specific individual cases in which we transfer data to countries outside the EU/EEA, for example when we process your claim.

When we use data processors outside the EU/EEA, we use the European Commission's standard data protection clauses; see Article 46(2)(c) of the General Data Protection Regulation.

III. Your Personal Data Rights

J. Right to withdraw consent

When you give us your consent, this may be done orally and in writing. If the processing of your personal data is based on your consent, you have the right to withdraw your consent. This means that, going forward, we will stop processing your data based on your consent. Your withdrawal of consent will not affect the legality of the data processing we have performed before you withdrew your consent.

You may withdraw your consent at any time by calling us on + 45 70 11 20 20.

K. Other personal data rights

When we process your personal data, you have a number of rights.

You have the right to obtain access to the personal data we process about you.

You have the right to rectification, i.e. to have inaccurate personal data about yourself corrected or your incomplete data supplemented with further data if this will make your personal data more complete or up to date.

You can always change your master data on My Page and My Business at tryg.dk.

You have the right to erasure, which means that, in certain cases, you have the right to have personal data about you deleted before the time when we generally delete data.

You have the right to have the processing of your personal data restricted. This means that, in certain cases, you have the right to demand that, in future, we process only data – with the exception

of storage – with your consent, or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

You have the right to object in certain cases. This means that you have the right to object to our otherwise lawful processing of your personal data.

You can always object to the processing of your data for direct marketing purposes.

You have the right to human intervention in connection with automated decision-making. This is the case if you have received a quotation or taken out an insurance policy via tryg.dk, or if you file a notice of claim digitally where our price and assessment of compensation are based on an automated decision.

You have the right to talk to us if you want an explanation for the decision or want to contest it.

You have the right to data portability, which means that you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to have those data transmitted to another insurance company.

You can read more about your rights in the Danish Data Protection Agency's guidance on the rights of data subjects, which you will find on www.datatilsynet.dk.

IV. How to contact us or complain

Tryg Forsikring A/S
Klausdalsbrovej 601
DK-2750 Ballerup

If you have any further questions about how we process your personal data, or if you wish to exercise your privacy rights, you can always call us on our main number +45 70 11 20 20, where you will be put through to the department responsible for handling your question.

If you wish to complain about our processing of your personal data, you can email kvalitetsafdelingen@tryg.dk.

You can also write to our Data Protection Officer at dpo@tryg.dk.

The Danish Data Protection Agency is the supervisory authority responsible for ensuring compliance with the rules in the personal data protection legislation in Denmark. You can lodge a complaint with the Danish Data Protection Agency at Datatilsynet, Borgergade 28, 5., DK-1300 Copenhagen K, www.datatilsynet.dk. We hope that you will contact us first, so that we can help you, assess your complaint and clarify and remedy any misunderstandings.