

## How personal data is used by us

AIG Europe S.A., Direktion für Deutschland, is committed to protecting the privacy of our clients, claimants, insurance agents and other business contacts.

The controller within the meaning of the EU General Data Protection Regulation (hereafter: GDPR) and other national data protection laws of the member states as well as other data protection regulations is: AIG Europe S.A., Direktion für Deutschland, Neue Mainzer Straße 46-50, 60311 Frankfurt am Main, Germany.

The contact details of the controller's third-party data protection officer are as follows: Attorney Dr. Karsten Kinast, LL.M., KINAST Rechtsanwalts-gesellschaft mbH, Hohenzollernring 54, 50672 Köln, Germany, or by e-mail to: [datenschutz-aig@kinast.eu](mailto:datenschutz-aig@kinast.eu).

„Personal data“ means any information by which you or others (such as your partner or other members of your family) can be identified and which refers to you or others.

### 1. Personal data processed by us for the execution of insurance contracts

Depending on the contractual relationship and, hence, depending on the type of insurance, the following personal data of a policyholder/broker/business partner is collected:

- **Aerospace | All-Risks Insurance:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), age/date of birth, place of birth, education (if relevant), occupation, nationality, health data, gender, vehicle ownership, license plate number, registration data. For legal entities: Contact details of contact persons
- **Aerospace | Product Liability :** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee)
- **Commercial Transport Insurance, Transport and Traffic Liability and Commercial Comprehensive Insurance Products:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), information concerning the establishment of the company, sales information, account data
- **Credit Insurance :** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee)
- **Insurance Broker:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), account information, credit information
- **Financial Lines | Cyber Digital:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), account information
- **Financial Lines | Directors & Officers BG Premier Protector:** First- und last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee)
- **Financial Lines | Directors & Officers Excess Insurance:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee)
- **Financial Lines | M&A:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee)
- **Financial Lines | Professional Indemnity Consulting:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), education
- **Financial Lines | Professional Indemnity Service Provider:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), education
- **Financial Lines | Professional Indemnity Self-Administrator (Insolvency):** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), education
- **Financial Lines | Professional Indemnity (Interpreters):** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), account information
- **Financial Lines | Professional Indemnity Insolvency:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), education
- **Financial Lines | Professional Indemnity Notaries:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), education
- **Financial Lines | Professional Indemnity Real Estate:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), education
- **Financial Lines | Professional Indemnity (RSW):** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), education
- **Financial Lines | Professional Indemnity (Tech):** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), education
- **Financial Lines | Professional Indemnity Directors & Officers Digital:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), account information
- **Private Clients / Commercial Clients | All Accident Insurance Products:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), age/date of birth, gender, occupation, account information, credit information
- **Private Clients/Commercial Clients | All Products:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), account information, credit information
- **Private Clients / Commercial Clients | Liability Insurance, Commercial and Private Insurance:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), age/date of birth, occupation, account information, credit information

- **Private Clients / Commercial Clients | Property, Commercial and Private Insurance:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), account information, credit information
- **Private Clients / Commercial Clients | Vehicle Insurance:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), account information, credit information
- **Property / Technical Insurance:** First and last name, address, e-mail address, telephone number
- **Third-Party Provider/Service Provider:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), account information, capital assets, credit information
- **Transport Insurance – Private Clients | Yacht/ Musical Instruments Insurance, etc.:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee), education (only concerning water sports licenses), account information
- **Travel insurance:** First and last name, address, e-mail address, telephone number (Policyholder/Authorized Representative/Designee)

**Purpose of the processing of personal data:** Execution of insurance contract as well as compliance with statutory requirements.

In detail:

- Insurance management, e.g. communication, verification and payment of claims
- Evaluations and decision-making regarding the provision and conditions of an insurance and the settlement of claims
- Support and advice on medical and travel matters
- Management of our business activities and IT infrastructure
- Prevention, detection and investigation of criminal offenses, e.g. fraud and money laundering
- Justification and protection of legal rights
- Compliance with laws and regulations (including compliance with laws and regulations outside your country of residence)

#### **Basis for the processing of personal data**

We process your personal data for the performance of the insurance contract or to carry out pre-contractual activities in accordance with Art. 6 (1) lit. b GDPR and to comply with special statutory provisions in accordance with the Insurance Contract Act (VVG), as applicable.

#### **Period of data storage**

Once the legally permissible purpose of data processing has ceased to apply, the data will be deleted, subject to statutory retention periods.

## **2. Processing of personal data for marketing and similar purposes**

Furthermore, the following personal data are collected for marketing and similar purposes:

- **Marketing, market research and analysis:** First and last name, address, e-mail address, position in the company, telephone number

Basis for the processing of personal data

We process your personal data to protect our legitimate interests in accordance with Art. 6 (1) lit. f GDPR, for the purpose of information about our services and invitations to events or workshops (marketing), or in order to improve our insurance products and services (market research and analysis). The legal basis for sending newsletters to broker.

To unsubscribe from marketing communications received from us, you have a right to object at any time with future effect. If you wish to do so, please send an e-mail to [info.deutschland@aig.com](mailto:info.deutschland@aig.com) or a letter by post to: AIG Europe S.A., Direktion für Deutschland / Marketing, Neue Mainzer Straße 46–50, 60311 Frankfurt, Germany.

#### **Period of data storage**

The data will be deleted as soon as the legally permissible purpose of data processing has ceased to exist, or exercised your right to object.

## **3. Disclosure of personal data**

For the purposes specified in section 1, personal data may be disclosed to our affiliates and other third parties (e.g. insurance brokers and other insurance distributors, insurance and reinsurance companies, credit bureaus, healthcare professionals and other service providers). Personal data are disclosed to the Reference and Information System of the Insurance Industry (Hinweis- und Informationssystem der Versicherungswirtschaft, HIS). Personal data are disclosed to third parties (including public authorities) if required by law or regulation. Personal data (including details of violations) may be entered in claims registers that are shared with other insurers. We are obliged to report all third-party claims for personal injury to the Employers' Liability Insurance Associations. We may search these registers to prevent, detect, and investigate fraud, or to review your claims history or that of another person or entity likely to be affected by the insurance or claim. Personal data may be disclosed to potential buyers and buyers of our company and transmitted after a sale of our business or transfer of company assets has taken place.

For the purposes mentioned in section 2, personal data may be disclosed to our group companies and other third parties (our IT service providers and service providers for print materials, advertising, marketing and market research as well as data analysis).

A list of the group companies and service providers that process data for AIG Europe S.A., Direktion für Deutschland, either on their own or on behalf of AIG Europe S.A., can also be found at [www.aig.de/privacy-policy](http://www.aig.de/privacy-policy).

#### 4. Transmission of data to other countries

Due to the global nature of our business activities, personal data may be transmitted to parties located in other countries (e.g. In the USA, China, Mexico, Malaysia, the Philippines, Bermuda, and other countries that may have a different level of data protection than your country of residence). We will take steps to ensure that your personal data will be sufficiently protected during these transmissions and transmitted in compliance with data protection laws and regulations. When transmitting data to a party outside the European Economic Area, we either transmit personal data to countries that the European Commission considers to have an adequate level of protection for personal data, or we use dedicated EU standard contractual clauses to protect your data.

Please refer to our Data Privacy Policy for information on international transmissions to affiliates and third parties. A current list of group companies and service providers providing data processing under a delegation of functions or on behalf of AIG Europe S.A., Direktion für Deutschland, can also be viewed on the Internet at [www.aig.de/privacy-policy](http://www.aig.de/privacy-policy)

#### 5. Security of personal data

Appropriate technical and organizational security measures are taken to protect and secure your personal data. If we disclose personal data to a third party (including our service providers) or engage a third party to process personal data on our behalf, such third party will be carefully selected and required to take adequate security measures.

#### 6. Your rights

The GDPR provide for the followings rights for you, as the data subject affected by the processing of personal data.

According to Art. 15 GDPR, you may request access to your personal data processed by us. In particular, you may request information on the purposes of the processing, the categories of personal data concerned, the categories of recipients to whom your personal data was or is being disclosed, the envisaged period for which the personal data will be stores, the existence of the right to request from the controller the rectification, erasure, restriction of the processing or to object to the processing of such personal data, the existence of the right to lodge a complaint, the source of the data, where the data is not collected from you, the right to be informed on the transmission of data to third countries or international organizations and on the existence of automated decision-making including profiling and, where appropriate, request meaningful details in this regard.

According to Art. 16 GDPR you have the right to obtain, without undue delay, the rectification of incorrect or the completion of incomplete personal data concerning you that are stored by us.

According to Art. 17 GDPR, you have the right to obtain the erasure of personal data stored concerning you that are stored by us, as long as processing is not necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, for purposes in the public interest or for the assertion, exercise or defense of legal claims.

According to Art. 18 GDPR you have the right to request the restriction of processing of your personal data, if the accuracy of the data is disputed by you, if their processing is unlawful, if the data is no longer necessary and their deletion is refused by you, because you need these data to assert, exercise or defend against legal claims. You are also entitled to the right under Art. 18 GDPR if you have objected to the processing pursuant to Art. 21 GDPR.

According to Art. 20 GDPR you have the right to request to receive the personal data concerning you in a structured and commonly used and machine-readable format or to request that the personal data be transmitted directly from one controller to another.

When processing your personal data on the basis of legitimate interest in accordance with Art. 6 (1) sentence 1 lit. f GDPR, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data in accordance with Art. 21 GDPR. The same applies to an objection directed against direct marketing. In the case of direct marketing, you have a general right of objection which we will implement without necessity to specify any particular situation.

According to Art. 7 (3) GDPR, you may withdraw your consent at any time. As a result, we will not be allowed to continue the processing of your data based on the relevant consent with future effect.

According to Art. 77 GDPR you have the right to lodge a complaint with a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence, your workplace or our company headquarters.