

Tryg's Personal Data Policy

Updated 1 May 2019

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 confidentiality

We are subject to confidentiality pursuant to the Danish Financial Business Act (Lov om Finansiell Virksomhed) and we process your personal data with absolute confidence. The duty of confidentiality also applies internally between our employees. We do not disclose your personal data unless we have your consent or 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 effect an insurance policy
- B Handle claims
- C Investigate suspected fraud and otherwise manage insurance contracts
- D Market products to you
- E Otherwise communicate with you

In Part II, you can read about how we protect your personal data when we

- F Communicate by email
- G Record phone conversations with you
- H Process your data digitally
- I Experience breaches to personal data security
- J Disclose personal data to other parties
- K Transfer data to third party countries

In Part III, you can read about your rights in relation to your personal data

- L Right to withdraw consent
- M Other personal data rights

In Part IV, you can read about how you can contact us and how you can make a complaint

I. How we process personal data about you when we

A. Prepare a quotation or effect an insurance policy

When we prepare a quotation or enter into an insurance contract, we process data about the party who takes out the insurance (the policyholder) as well as 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 health insurance paid by the employer)
- Beneficiaries
- Representatives/contacts
- The owner/user of an insured item

Categories of personal data we collect, use and process

We only collect and use data when it is necessary in order to enter into, manage and perform the contract. Data we need to process in connection with quotations and the effectuation of insurance policies will depend on the concrete type of insurance. We do not request health data in connection with quotations and effectuation 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 number (in Danish: CPR-nummer) 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)
- Your connection to our business 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 benefits
- Data about fees due in DFIM (the Danish Motor Insurers' Bureau)
- Our assessment of your customer status and profitability

We request your consent to in order 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 (in Danish: Det Centrale Personregister) (in order to update address and opt-out registration for unsolicited advertising)
- Virk.dk (in order to update address and for information about opt-out registration for unsolicited advertising)
- BBR (The Building and Dwelling Register for information about your property)
- DMR (Digital Motor Register)
- Bilstatistik.dk (information about motor vehicles)
- DFIM (the Danish Motor Insurers' Bureau)
- Other insurance companies
- Business partners, including trade unions, who entitle you to discounts and other benefits
- Business partners and suppliers who assist us in the management and performance of your insurance contract

- Employers and pension providers (for registration under group insurance policies)
- Representatives/contact persons

In some cases we obtain data about your insurance policies from your current and previous insurance companies and exchange data with business partners who entitle you to discounts and other benefits. We request your consent to do so.

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 during such period when we can be met by a claim, are obliged to do so pursuant to current legislation (e.g. the Danish Bookkeeping Act (Bogføringsloven) and the financial supervisory legislation) or have another legitimate purpose with data storage.

We store quotations to private individuals up to six months in case 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 made. We also store the policy as long as we have a claim registered.

B. Handling of claims

When we handle claims under private, commercial and group insurance policies, we only register personal data necessary to process the claim and assess the compensation under the claim; see Article 6(1)(b) (necessary for the performance of a contract), Article 9(2)(f) (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
- Business partners and processors
- Representatives/contact persons

Categories of personal data we collect, use and process

During our claims-handling, we only process and register data which is 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 number (CPR) in order to identify you
- Payment details
- Employment relationship
- Insurance data (from current and previous insurance policies with other insurance companies about types of claims, claims experience, compensations paid, claims documentation and date and reason for termination)
- Data about the damaged item (e.g. age, purchase price and examination results)

- Events occurred in connection with the damage or injury (e.g. analysis, reconstruction of an accident, loss adjuster's report and police reports)
- Data about health, illness and contacts to health care services
- Salary and social and financial circumstances (for calculating a compensation)
- Photos, film and telephone recordings of the damage or injury

Collection and disclosure of personal data

We disclose only personal data which is necessary in order for us and our business partners to process your claim, or if we are legally bound to do so (e.g. reporting of current compensations paid to SKAT) (the Danish 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
- Business partners and suppliers who assist us in the administration, handling, assessment or repair of a damage or injury (e.g. loss adjusters, workshops, tradesmen, emergency call centres and carriers)
- Treatment providers, e.g. physicians, specialists, dentists, psychologists, physiotherapists et al.
- The Danish Labour Market Insurance (Arbejdsmarkedets Erhvervssikring)
- Public authorities such as municipalities, SKAT and the police
- The Central Office of Civil Registration (Det Centrale Personregister) (in order to update address)
- Appeal boards, appeal bodies and courts
- Other insurance companies (e.g. in connection with recourse where we collect our outstanding amounts from an insurance policy in another company, or where other insurance companies direct their claims to us)
- Mortgagees
- Leasing companies
- Buyers of damaged goods (e.g. cars and machines declared total losses)
- Representatives/contact persons
- Other departments in Tryg Forsikring A/S (e.g. in case of exchange of data between workmen's compensation, liability and accident insurance concerning the same claim)

In personal injury claim cases, the consent form which you sign contains information about the sources from whom we may obtain data and the parties who we, with your consent, 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 during such period when we can be met by a claim, are obliged to do so pursuant to 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, stipulated in the Danish Act on Limitation Periods, from when the notice of claim was reported, 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 your claim for compensation is legitimate and preventing our customers having to pay higher premiums due to insurance fraud; see Article 9(2)(f) (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> (NB; the link is in Danish). We follow the code of conduct of the trade organisation Forsikring & Pension (the Danish Insurance Association). In addition to the data and sources normally forming part of our claims-handling, we also obtain data from publicly accessible sources and open profiles on social media in accordance with the guidelines laid down in the code of conduct.

Pay out bonus

As a policyholder in Tryg you are automatically a member of TryghedsGruppen to whom we distribute data in order for them to administrate your membership. Under certain circumstances, members of TryghedsGruppen receive bonus payments calculated on the basis of insurance covers. Also, as a member you may run for candidacy and vote at elections in the committee of shareholders in TryghedsGruppen. To enable TryghedsGruppen to administer your membership, we disclose your name, address, policy number and civil registration number/ company registration number, account number and payable bonus.

Manage non-payment

If you fail to fulfil your payment obligations to us, we may report you to credit rating agencies or warning registers in accordance with the applicable law.

Prepare statistics and analysis

We use your data for studies and analysis to improve our products, services, offers, advisory services and technical solutions. We use statistics and analysis, including profiling, to monitor profitability, prepare insurance tariffs and calculate insurance premiums, customer follow-up, product recommendations, insurance provisions, solvency and reinsurance. Our reason or 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 management for insurance companies and insurance distributors, as well as Article 6(1)(f) (legitimate interests) of the General Data Protection Regulation, when the purpose is marketing and prevention of fraud.

Profiling is performed automatically by comparing personal data about e.g. your address, age, claims experience and other information pertaining to your customer status.

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 during such period when we can be met by a claim, are obliged to do so pursuant to current legislation (e.g. the Danish Bookkeeping Act (Bogføringsloven) and the financial supervisory legislation) or have another legitimate purpose to store the data.

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.

Among other things, we collect data from the public telephone directory and other public registers, competitions in which you participate as well as from business partners where you are a member/customer or where you have another connection which entitles you to special discounts and benefits.

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

E. Communicate with you on other matters

When you contact us with questions about e.g. insurance policies, complaints or if you are a representative or contact person for one of our customers, suppliers or business partners, we process your personal data in order to provide you with the correct aid, advice or service, see Article 6(1)(b) (required to perform a contract) and Article 6(1)(f) (legitimate interests) of the General Data Protection Regulation.

If you have participated in a satisfaction survey on the phone or online, we store your reply with your phone number or online identifier (IP address and cookie), see Article 6(1)(f) (legitimate interests) of the General Data Protection Regulation.

If you have registered for a news letter from us, we store your contact information for this purpose, see Article 6(1)(f) (legitimate interests) of the General Data Protection Regulation.

Storage

We store personal data for as long as this is necessary to fulfil the purpose of the processing, e.g. for as long as we provide a service or need to document our agreements pursuant to the Danish Bookkeeping Act (Bøgføringsloven) or the Danish Limitations Act (Forældelsesloven) or have another legitimate data storage purpose.

II. How we protect your personal data when

F. Communicate by email

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

Please note that we cannot guarantee confidentiality and use of encryption when you have received the email in your mail server or when you send emails to us, as this will depend on your service provider. We can receive emails with Tunnel Layer Security (TLS) if your provider supports this feature.

It is important that you choose a trustworthy and secure supplier who supports receiving mails with TLS as a standard. You should also secure your account with a strong password and 2-factor login. Read more about being a digital customer at <https://tryg.dk/digital>.

G. Record telephone conversations with you

In order to improve our service, on an ongoing basis, we may record our telephone conversations with you. We use the recordings for internal educational purposes, documentation and to improve our customer service. We store the recordings safely and as a rule store them for a period of three months whereafter they are deleted. For analysis purposes we may convert the conversations to text, which is stored for a maximum period of 12 months.

H. Process your data digitally

When you visit our website, we use cookies. You can read our cookie 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 report a claim online, we register the data you give us. Your notice of claim will be encrypted. We store the data for as long as it is 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>. You may be exempted from receiving your mail in the customer portal if you are exempted from receiving digital mails from the public sector.

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 query. The chat function is encrypted and we delete the conversation after three months. We store the data which we need in accordance with our general guidelines for data storage. We recommend that you do not chat with us about matters involving processing of sensitive personal data. Instead, call us on + 45 70 11 20 20.

When you use our applications, you can read more about our processing of personal data in the terms and conditions in the specific app that you are using.

Facebook

When you visit our facebook site, Facebook collects and processes personal data about you as described in Facebook's data and cookie policy. For further information, visit the following links:
<https://www.facebook.com/privacy/explanation>
<https://www.facebook.com/policies/cookies>

Facebook collects data by placing cookies on your computer or unit and data stored in these cookies are collected when you use the facebook

products. Data is collected when you perform an activity on our facebook site such as using the functions "like" or "sharing of posting" or if you comment on a post from us. Such cookies are active for two years, unless you delete them.

Facebook uses the data to improve their advertising system and to adapt marketing on our facebook site. On an ongoing basis, we receive statistics regarding facebook users who have performed an activity on our facebook site. We use this statistics to adapt our marketing to different target groups.

Consequently, we and Facebook are joint data controllers of the collection of data. This means that you may, at any time, exercise your rights in relation to the personal data regulation towards both us and Facebook.

Also, please notice that in case you write to us through Facebook we are unable to encrypt, protect, correct or delete your data. Thus, we recommend that you call us at +45 70 11 20 20.

I. Experience personal data breaches

We are responsible for reporting breaches to the Danish Data Protection Agency (Datatilsynet) which 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 of this directly. We will do this either by telephone, email, text message, on 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, please contact us as soon as possible so we can handle the matter.

J. Disclose personal data to other parties

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

We only disclose personal data when necessary in order to, for example, perform and manage your insurance contract, process your claim, or if you wish to use your affiliation to a business partner to obtain a discount and other benefits.

Our business partners may act as our right-arm men and work under our instructions (data processors), or they may act as independent data controllers, just like us.

Among other things, we use data processors for development, hosting, support and operations.

When we enter into an agreement with a data processor about the processing of your personal data on our behalf, we emphasise that the data processor also needs to be able to process your personal data in a secure manner and in accordance with current legislation. Consequently, we perform a risk assessment of our data processors before entering into an agreement with them and disclosing your personal data to them.

When our business 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).

K. Transfer data to third countries

We use data processors and sub-processors outside the EU/EEA in connection with technical IT development, hosting and support and operation. 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

L. Withdrawal of consent

When you give us your consent, this may be done orally and/or in writing.

When 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 the specific consent. Your withdrawal of consent will not affect the legality of the data processing we have performed before you withdrew your consent. Also, your withdrawal of consent shall only apply to such data which we have processed based on your consent but not to any data which we process on other legal grounds, e.g. Article 6(1)(b) (required to perform a contract) of the General Data Protection Regulation.

You may withdraw your consent by calling us at + 45 70 11 20 20 or by contacting the department which obtained your consent.

M. 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 you 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 deletion which means that, in certain cases, you have the right to have personal data about you deleted earlier than 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, future processing of data – with the exception of storage – is only performed with your consent or for the establishment, exercise or defence of legal claims, for the protection of personal rights or for reasons of important public interest.

You have the right to human intervention in connection with automated decisions. This is the case if you have received a quotation or taken out an insurance policy online, or if you report a claim digitally and our price and fixing of compensation is 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 this 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 personal data rights, you can always contact us at www.tryg.dk or call us at 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 send an email to kvalitet@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 of the personal data protection legislation in Denmark. You may file a complaint with the Danish Data Protection Agency at Datatilsynet, Borgergade 28, 5., DK-1300 København K, www.datatilsynet.dk. We hope that you will contact us first so that we may help you, assess your complaint and clarify and remedy any misunderstandings.