

Privacy policy for intermediaries

Our handling of your data and your rights

Subsequently, we would like to inform you about how PrismaLife AG processes your personal data and about your rights pursuant to data protection regulation under the EU General Data Protection Regulation (GDPR). As an insurance company, we are primarily subject to the GDPR through our registered office in the Principality of Liechtenstein (European Economic Area). In addition, due to our cross-border activities, we take into account the national data protection regulation relevant for you.

What data is processed specifically and in what way it is used depends largely on our business relationship.

1. Who is responsible for data processing and who is the contact person?

PrismaLife AG is responsible for data processing.

Our contact details are:

PrismaLife AG
Industriering 40
9491 Ruggell
Liechtenstein
Phone: +423 220 01 00
Email address: info@prismalife.com

For data protection matters, please contact our data protection officer at the above postal address or by email: dataprotection@prismalife.com

2. What personal data do we use and where does it come from?

We process personal data that we have received from you as part of our business relationship. In addition – to the extent necessary for providing our services – we process personal data that we have received or will receive in the future from third parties (e.g. from cooperation partners or credit reference agencies) in a legitimate way (e.g. for the execution of orders, for the performance of contracts or on the basis of consent granted by you).

Furthermore, we process personal data that we have legitimately obtained from publicly available sources, (e.g. debtor lists, commercial registers and registers of associations, the press, media), and that we are allowed to process.

We collect personal data without the participation of the affected person if we have received the data from the affiliation documents from you as our business partner. If we also receive the data of other persons in addition to your personal data, you as our business partner must inform the affected persons of the data processing. This may, for example, be sub-intermediaries or your employed and/or freelance staff.

Relevant personal data includes personal details (name, address and other contact details (e.g. salutation), date and place of birth as well as nationality), proof of identity data (e.g. identity card data), data on intermediary status, data on previous activities and authentication data (e.g. specimen signature), data regarding payment transactions (e.g. bank account details), debt collection data and commission and fee data.

In addition, we process data that you provide in the "Distribution Partner Onboarding Form - International" and in the "Sales partner data update sheet" as part of our business relationship (e.g. Chamber of Industry and Commerce register number / RUI or GISA number, SCHUFA excerpt, business registration, if applicable commercial register excerpt, copy of the broker license and articles of association or partnership agreement), your broker number and data from the fulfilment of our contractual obligations, information about your financial situation (e.g. credit score data, scoring/rating data), register data as well as personal data that you exchange with us in the future in the electronic partner portal as well as other data comparable to the aforementioned categories.

In the event that you provide an electronic signature when filing an application or other documents to be signed during our contractual relationship, we record biometric data (writing speed, writing direction, writing pauses and, if applicable, pressure) and store or use this data to establish, execute or terminate this insurance policy and to realise the partner portal. For the purpose of evidence in any dispute on the genuineness of your signature, we register this data with a notary who is legally bound to confidentiality, for the purpose of the establishment, exercise and defence of legal claims.

3. Why do we process your data (purpose of the processing) and what is the legal basis for this?

We process your personal data in compliance with the General Data Protection Regulation (GDPR), the Liechtenstein Data Protection Act (DSG) and the relevant provisions of all other applicable country-specific laws.

The data, on the basis of the statutory provisions pursuant to the GDPR, is primarily processed to fulfil the contract (see section 3 a)), to safeguard our legitimate interests (see section 3 b)), on the basis of your consent (see section 3 c)) and/or to fulfil legal obligations (see section 3 d)).

The legal basis and the associated processing purposes of the processing of your personal data are described below.

a) For the fulfilment of pre-contractual and contractual obligations (article 6 paragraph 1 b) of the GDPR)

The processing of your personal data mentioned above under section 2, excluding salutation information, is necessary for the conclusion and fulfilment of the intermediary agreement. This includes commission settlements, reliability checks, production statistics and production management.

b) As part of the balancing of interests (article 6 paragraph 1 f) of the GDPR

If necessary, we process your data beyond the actual performance of the contract in order to safeguard legitimate interests of ours or of third parties, unless your interests or fundamental rights and freedoms, which require the protection of personal data, prevail.

These include among others:

- > customer-oriented personal approach in written and oral communication
- > consultation and exchange of data with credit reference agencies for determining your payment behaviour and creditworthiness based on mathematical-statistical methods using address data;
- > review and optimisation of procedures for the analysis of needs and digital communication;
- > asserting legal claims and defence in legal disputes;
- > ensuring the IT security and IT operation of the insurance company, performance of stress tests, development of new and adaptation of existing products and systems, migration of data to ensure the viability and integrity of the systems and thus in the broader sense also of the processed data;
- > prevention and investigation of criminal offences, we particularly use data analyses to identify indications that may point to insurance fraud;
- > measures for the business management and further development of processes, services and products;
- > risk management within PrismaLife AG;
- > risk assessment, balancing of the risks assumed by PrismaLife AG and ensuring the satisfaction of your claims;
- > preparation of intermediary-specific statistics for the development of new tariffs, customer care, quote and application processing, contract management, service provision and risk minimisation;
- > "compliance" purpose: conformity with legal and other requirements, e.g. recording and advice- provision obligations, audits, compliance with audits by the government/authorities, reaction to legal processes, pursuit of statutory rights/remedies, management of internal complaints/claims, investigations and compliance with strategies/procedures;
- > Identification and connection of employed and/or self-employed staff and subcontractors;
- > planning, implementation and documentation of internal auditing measures to ensure continuous improvement of our business processes and fulfilment of regulatory obligations.

If we want to process your personal data for a purpose not specified here, we will inform you of this in advance in accordance with the statutory provisions.

c) On the basis of consent (article 6 paragraph 1 a) of the GDPR in connection with art. 7 of the GDPR)

If you have given consent to process personal data for certain purposes, this processing is as a result deemed lawful, for example consent for the processing of your biometric data in the event of submission of an electronic signature. Any consent you have given can be withdrawn at any time at our contact address (article 7 paragraph 3 of the GDPR). This also applies to the withdrawal of declarations of consent that were given to us before the General Data Protection Regulation becomes effective.

Please note that the withdrawal of consent will only have effect for the future. Processings carried out before the withdrawal of consent are not affected.

d) Due to statutory obligations ((article 6 paragraph 1 c) of the GDPR) or in the public interest (article 6 paragraph 1 e) of the GDPR))

In addition, we process your personal data to fulfil statutory obligations, for example supervisory require- ments, commercial-law or tax-law retention obligations, fraud and money-laundering prevention, to fulfil checking and reporting requirements under tax laws, to assess and manage risks and for the purpose of informing public authorities and institutions.

4. To whom may your data be passed on or from whom do we receive it?

Within PrismaLife AG, your data is received by the departments that need it to fulfil pre-contractual and contractual obligations, in the context of the balancing of interests or your consent and on the basis of statutory obligations or in the public interest. External recipients of your personal data can, for example include:

a) Reinsurers:

More information on the appointed reinsurer is available on their websites:

Swiss RE Europe S.A., Germany branch, Munich

www.swissre.com/privacy-policy.html

RGA International Reinsurance Company dac, Germany branch, Cologne

<https://www.rgare.com/our-company/responsibility/policies-and-governance-center/policy-and-rights/privacy-policy>

Hannover Rück SE, Germany Hannover

www.hannover-rueck.de/182750/datenschutz

You can also request information from the contact details provided above.

b) Broker pool

If you have a contractual relationship with a broker pool that looks after you and submit insurance applications via this pool, the broker pool processes the personal data required to conclude and implement the contract concluded with you. In accordance with the agreement, we transmit to the broker pool personal data relating to your brokerage activities, e.g. on settled remuneration

c) Processors:

If necessary, we sometimes work with processors to fulfil our pre-contractual, contractual and statutory obligations, which you can find in the current version of our service provider list on our website.

d) Public authorities and institutions:

In addition, we can transfer your personal data to additional recipients, such as to authorities to fulfil statutory notification obligations (e.g. supervisory authorities such as FMA, FINMA, BaFin, IVASS, prosecution authorities, MFSA etc.)

e) Debt collection agencies:

If you as our distribution partner do not meet your contractual obligations and fall into payment arrears, we retain an authorised debt collection agency to collect the debt on a case-by-case basis.

f) Other data recipients:

In addition, other data recipients may be those entities for which you have given us consent to the transfer of data or an order to do so (e.g. authorities, courts, official experts, appraisers, lawyers, credit institutions etc.).

A list of the order processors appointed by us with which we do not have an ongoing business relationship and all other aforementioned recipients of your personal data is available in the overview of our service provider list on our website at www.prismalife.com/en/data-protection.

5. Transfer of data to a third country

Should we transfer personal data to service providers outside the European Economic Area (EEA), the transfer will only take place if the third country has been confirmed by the EU Commission as having an adequate level of data protection or if other appropriate data protection guarantees (e.g. binding internal data protection regulations or EU standard contractual clauses) are in place. For example, we transfer personal data to our IT provider based in Switzerland. The EU Commission has confirmed an adequate level of data protection in Switzerland. You can find detailed information on this in the Commission's decision here:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32000D0518>

Personal data that is processed in connection with an M365 application is generally not passed on to third parties unless it is intended for transfer. However, when using these standard IT components and systems (e.g. Microsoft (Outlook, Teams), Adobe Inc., Zoom Video Communications, Inc. etc.), it cannot be completely ruled out that an IT service provider from a third country (e.g. USA) may in certain cases gain controlled access to personal data or be able to access it. The EU Commission has confirmed an adequate level of data protection for the USA and the aforementioned certified companies. You can find detailed information on this in the Commission's decision here: https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en

In addition, we have concluded an order processing contract with these companies, including the standard contractual clauses of the EU Commission.

You can request detailed information on this and on the level of data protection using the contact details above.

6. How long will my data be stored?

We store your personal data for as long as it is needed for the aforementioned purposes. Thereby it may happen that personal data is stored for the period in which claims against our company can be established (statutory period of limitation of three or up to thirty years). In addition, we store your personal data if we are legally obliged to do so. The corresponding proof and retention obligations result from, among other things, from the Act on the Supervision of Insurance Undertakings, the Due Diligence Act or the Anti-Money Laundering Act. The storage periods are usually ten years.

7. What data protection rights do I have?

According to the General Data Protection Regulation, you as the affected person have the right of access pursuant to article 15 of the GDPR, the right to rectification pursuant to article 16 of the GDPR, the right to erasure pursuant to article 17 of the GDPR, the right to restriction of processing pursuant to article 18 of the GDPR and the right to data portability from article 20 of the GDPR. Furthermore, there is a right to withdraw consent pursuant to article 7 paragraph 3 of the GDPR and a right to withdraw pursuant to article 21 of the GDPR. If you make use of your aforementioned rights, we ensure that the statutory requirements for this are met.

In addition, there is a right to file a complaint with a supervisory authority for data protection (article 77 of the GDPR).

The data protection supervisory authority responsible for us is:

Datenschutzstelle Liechtenstein
Kirchstrasse 8
P.O. Box 684
9490 Vaduz
Liechtenstein

You can exercise all rights by sending an email to dataprotection@prismalife.com, by communication by mail or via the contact form on our website or via the partner portal.

So that our reply can be addressed to you as the affected person, you need to identify yourself or contribute to the identification of your person.

8. Am I obliged to provide personal data?

The provision of your data is mandatory. Without the provision of your data, a fee or broker agreement cannot be concluded or fulfilled. If you do not provide us with the necessary information or documents, we cannot establish or continue the requested business relationship.

9. To what extent is there automated individual decision-making?

In principle, we do not use fully automated decision-making procedures pursuant to article 22 of the GDPR to establish or conduct the business relationship. Should we use these procedures on the case-by-case basis in the future, we will inform you separately, insofar this is required by law.

Information on your right to object pursuant to article 21 of the General Data Protection Regulation (GDPR)

1. Right to object in individual cases

You have the right to object at any time on the grounds relating to your particular situation regarding the processing of personal data concerning yourself that is based article 6 paragraph 1 e) of the GDPR (data processing in the public interest) and article. 6 paragraph 1 f) of the GDPR (data processing on the basis of the balancing of interests).

If you file an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

2. Right to object to the processing of data for direct marketing purposes

We process your personal data for direct advertising purposes in individual cases. You have the right to object to the processing of personal data for the purposes of such advertising at any time.

If you object to processing for direct advertising purposes, we will no longer process your personal data for such purposes.

The objection can be made without any conditions as to content or format and should be addressed to:

PrismaLife AG
Industriering 40
9491 Ruggell
Liechtenstein
Email address: info@prismalife.com

If you have any questions regarding this privacy policy, please do not hesitate to contact PrismaLife AG using the above contact details.

Note:

This "Privacy policy for intermediaries" may be updated at a later date due to changes, for example to the statutory provisions. You can find the latest version of this data protection notice at www.prismalife.com/en/data-protection.