

Privacy Statement



Version July 2025

This Privacy Statement was last updated on July 2025. This is a translation of the original Dutch text. In the event of any disparity between the Dutch original and this translation, the Dutch text will prevail.

A. ABN AMRO Verzekeringen and your personal data

We believe it is important to handle your personal data carefully. We take various measures in this regard. This Privacy Statement explains how we handle your personal data.

1. Who is this Privacy Statement intended for?

If you are a customer of ours or have shown interest in a particular product, for example by making an application, we will process your personal data and this Privacy Statement will apply to you.

We may also process the personal data of people who do not have an agreement with us. For example, if you have been involved in a claim from one of our customers.

2. Who is responsible for your data?

ABN AMRO Verzekeringen is responsible for your data. It is a joint venture between NN Group NV and ABN AMRO Bank NV and is part of NN Group NV. ABN AMRO Verzekeringen consists of the following companies: ABN AMRO Schadeverzekering NV, ABN AMRO Assuradeuren BV and ABN AMRO Verzekeringen BV. This Privacy Statement applies to the aforementioned companies.

For personal insurance, ABN AMRO Bank usually acts as the broker. For commercial insurance, ABN AMRO Verzekeringen itself (usually) acts as the broker. You may also take out private insurance with us through another broker.

3. What is personal data?

Personal data is information about you. The best-known examples of personal data are:

- name;
- residential and email address;
- age and date of birth.

Your bank account, telephone number and IP address are personal data. Special personal data are a separate category defined by law. These include data concerning your health, for example.

To enable us to assess risk in non-life insurance, we may also request from you and process information concerning any criminal record you may have. In such a case, we would like to know whether you or anyone else with an interest in the insurance has been in trouble with the police or the law in the past 8 years. By this, we mean:

- an ongoing investigation;
- that you are or have been the accused (dismissal);
- a conviction;
- the execution of a punishment or an order or;
- dismissal of criminal charges.

If this happened more than 8 years ago, you do not need to report it. You also do not have to report criminal records if we do not specifically ask for them. We use the provided criminal history to assess your insurance application and for an appeal against non-compliance with the applicant's obligation to provide information. In addition, we may process criminal data to prevent and combat fraud and abuse. We process these data pursuant to Article 33 of the Dutch General Data Protection Regulation (Implementation) Act (UAVG) and the Code of Conduct for the Processing of Personal Data by Insurers (GVPI). In this regard, we adhere to the Protocol in respect of the Financial Institutions' Incident Warning System (Protocol Incidentenwaarschuwingssysteem Financiële Instellingen – PIFI).

B. Processing personal data

1. What do we mean by 'processing personal data'?

'Processing' is a term defined by law. We use it to mean collecting, storing and using your personal data. We process your personal data in compliance with the laws and regulations, including the provisions of the General Data Protection Regulation (GDPR) and the Code of Conduct for the Processing of Personal Data by Insurers.

2. Data obtained by us from other parties

We also use data about you that we have not obtained from you. For example, we may also request data about you if your partner applies for insurance partly on your behalf. In addition, we may use data from other sources. For example:

- Public registers containing your data, such as those of the Netherlands' Cadastre and the Chamber of Commerce.
- Public sources such as newspapers, the Internet and non-private parts of social media.
- Files from other parties that have collected data about you, such as market research agencies, trade information agencies and credit reference agencies. In this context, mention should also be made of the Central Information System Foundation (Stichting CIS): a foundation that manages an external registration system for insurers.
- Brokers and advisers you have used and through whom you have taken out insurance with us;
- Your employer. But only if you are insured with us through your employer for loss of income.

3. On what basis do we process your data?

Of course, we are not permitted to request or use your data without good reason. The law states that this is only allowed if there is 'a legal basis for processing'. Accordingly, we are permitted to use your data for one or more of the following reasons:

I) Contract

We will use your data to conclude and fulfil contracts with you, such as an insurance agreement. To perform the insurance agreement, we use all kinds of data about you. For example, your address, email address, bank account number and date of birth. In some cases, the data will also include your car registration number or the composition of your family. For some insurance policies (for example, accident insurance), we also process medical data. We will obtain this data from you or – with your consent – from a doctor. Your medical data will be processed under the responsibility of the medical adviser (doctor). The medical adviser will only disclose medical data to other employees within our company if they require these to perform their work. These employees are subject to the same duty of confidentiality as the medical adviser by virtue of his medical confidentiality.

II) Legal obligation

Financial institutions must comply with many laws and rules. These are not only European or Dutch rules, but in some cases also other countries' rules. We will process data about you on the basis of these rules, for example to obtain the fullest possible picture of you as a customer. We also take measures to combat fraud, tax evasion, the financing of terrorism and money laundering. We will therefore also process your data in order to identify you.

III) Our or other parties' legitimate interests

We are also permitted to use your data if we ourselves have an interest in doing so. This is known as a 'legitimate interest'. Our interest in using your data must nevertheless outweigh your right to privacy. We therefore weigh all interests in this regard.

The following are examples of cases where we have a legitimate interest in using your data:

- When we need to protect our own financial position and that of others, for example to prevent and combat fraud. This not only concerns fraud against us, but also against other financial institutions. We may therefore exchange data with those other financial institutions. We may also include that information in internal records or in an external register.
- When we perform a contract. In some cases, we will record data of persons other than our customers, such as injured parties, administrators, beneficiaries and people who have provided security on behalf of a customer. We will do so only to the extent necessary to perform the contract with the customer.
- When we wish to improve our assessment of risks, continue developing our products and price our products appropriately, we will use your data for statistical purposes.
- When we need to obtain correct information in connection with a complaint or dispute.
- When we wish to improve our services. For example, when we:
 - wish to improve the efficiency of our record-keeping by centralising the administrative systems,
 - wish to improve customer experience,
 - wish to use external service providers, or
 - wish to conduct statistical and scientific research.We may use artificial intelligence (AI) in this regard.
- When we carry out marketing, communication and innovation activities. We then use data for (data) analysis and for innovations that use data analysis, such as developing and testing artificial intelligence (AI) applications. We do this to improve our processes, products and services and to better tailor them to (the wishes of) our customers (or potential customers). Or to improve the operation of our website and to show targeted advertisements. See also the cookie statement on our website in this regard.
- Someone else may also have a legitimate interest that requires us to use your data. For example, if your car has been damaged and we have to settle the claim with the other party. We will then exchange data, such as your car registration number, with the other party's insurer.

IV) Consent

In most cases, we do not require consent to use your personal data. This is the case if:

- we use your data for the performance of the contract,
- we have a legal obligation to process personal data, or
- we have a legitimate interest in processing your personal data.

If we require your consent, we will explain why we need it. You can withdraw your consent at any time.

In the following cases, we will always ask you for consent;

- Before we process your special personal data, unless the law states that we may or must use certain special personal data without your consent.
- If we use automated decision-making and profiling and the law states that we must obtain your consent to do so.

4. Other purposes

We are permitted to use your data for purposes other than those for which you provided them to us. The new purpose must then be compatible with the purpose for which you initially provided your data to us. In legal terms this is referred to as 'compatible use of data'.

5. Compulsory data

If we need your data to conclude a contract with you and you are not willing to provide them, even though the law requires you to do so, we will unfortunately be unable to enter into a contract with you or we will have to terminate a current contract with you. The forms or online forms that you occasionally have to complete will tell you which data are compulsory.

If you would like us to delete your data from our systems, unfortunately this is not possible for the compulsory data. We need those. For example, to perform the agreement you have with us, because we are obliged to retain these data by law or because of a legitimate interest (see the explanation on page 2 and 3).

6. Camera images, telephone calls, chats and video chats

It is also possible to contact us by telephone, chat or video chat. In most cases we record your telephone calls or chats and video chats with our colleagues. We do that in order to:

- improve our services, for example to coach or assess our employees,
- comply with a statutory obligation,
- supply evidence, or
- prevent fraud.

Using AI, we can automatically convert recordings of calls into text (speech to text) or summarise and analyse them for purposes described above.

We handle such video and audio recordings with care. They are subject to the same rules as other personal data. You can exercise your rights, such as the right of access.

7. Other parties that use your data

In some situations, we have to share your data with people and organisations involved in our services. You can read below who those are.

Our service providers

We sometimes also cooperate with companies that help us provide our services to you. That is known as outsourcing. For example, we may engage companies in the settlement of a claim. In addition, we may engage an expert, for example to investigate an on-site fire damage, or a medical adviser to investigate the physical consequences of an accident. In some cases, those companies need your data in order to perform their work for us properly.

There are special legal requirements for outsourcing by insurers. We therefore choose these companies carefully. We enter into a contract that clearly states how they will handle your data. We ourselves remain responsible if we engage another company to work for us.

Our own group

Within NN Group NV, of which we are part, we are permitted to share your data for internal administrative purposes or to improve our services to you. We may also share your data to combat fraud.

Brokers

You may have purchased one of our personal insurance policies through a broker. Usually that is ABN AMRO Bank, but it may sometimes be another broker. Brokers process your personal data and are themselves responsible for using them. To find out more about the broker's handling of your personal data, please consult the broker's website.

Autorised public authorities

Government authorities such as the Tax and Customs Administration, the Public Prosecution Service, investigation services and our own supervisory authorities may request data. We are required by law to provide these data, which may also include data concerning you.

External parties

We may share your information with external registers such as CIS and the External Reference Register (EVR). But also with bailiffs, collection agencies and/or civil-law notaries, and credit reference agencies (such as EDR). Or with other insurers, including reinsurers and legal expenses insurers. We do this if it is necessary to perform the agreement or if there is a legitimate interest to do so.

Third parties with a legitimate interest

We can also provide your data to third parties if they have a legitimate interest to process this information. If your car is damaged and the claim has to be settled with the other party's insurer, your data will also end up there.

8. Use of your data for direct marketing

If you have previously purchased a product or service from us or requested information, we would like to offer you similar products and services that best suit you. To do that, we will use personal data that we have obtained from you. We may also use personal data that we have obtained from other parties.

9. Profiling

Some parts of ABN AMRO Verzekeringen, such as ABN AMRO Schadeverzekering NV, use profiling. You can read why and when we do so below.

Combatting fraud

We have extensive knowledge of and experience with combatting fraud. Unfortunately, we are encountering increasingly sophisticated types of fraud. To find out what practices or indications point to a certain type of fraud, we observe precisely what happens when insurance fraud is committed. This is how we arrive at a profile that we use to recognise and further explore certain activities. In doing so, we may use artificial intelligence (AI). We may then take measures to combat fraud as effectively as possible.

When assessing an application for insurance or when handling a claim, we may also use various sources such as the Chamber of Commerce, fraud registers and the Central Information System Foundation (CIS). CIS is the central information system of insurers in the Netherlands. This system is managed by the Central Information System Foundation and is designed to manage risks and combat insurance crime. We may request information about you through CIS, such as when assessing an application or claim. We do so only under strict conditions.

We can also have your data about, for example, a claim or fraud recorded in CIS. On the basis of the Incident Warning System Protocol for Financial Institutions (PIFI), ABN AMRO Verzekeringen records in the so-called Incident Register data of legal and natural persons who have caused or could cause harm to ABN AMRO Verzekeringen, our customers or employees or who may compromise the integrity of ABN AMRO Verzekeringen. The data recorded in the Incident Register can be exchanged with other financial institutions within the rules of the PIFI for the purpose of investigating fraud, among other things. By means of the External Referral Register linked to their own Incident Register, other financial institutions can receive a signal on the basis of which they must further investigate an application or claim for compensation. More information about CIS and the CIS privacy regulations can be found on the website of the Central Information System Foundation: www.stichtingcis.nl

Client acceptance

Profiling may be used if you wish to take out insurance from us. As an insurer we may use profiling, for example, to analyse risks when you apply for insurance (including online). Insurers know from experience that certain factors may indicate that a customer or prospective customer will suffer losses more often than usual. When you apply for insurance, we will examine these factors and draw up a profile based thereon.

10. Automated decision-making

In some cases, we will use an automated process to assess your application or claim. In doing so, we may use AI. On the basis of the information you have provided, we will automatically assess whether you meet our acceptance or claim criteria. We will check, among other things, whether the data you provide about yourself or the insured objects are correct. We will also check against fraud indicators and make a risk assessment based on your data and data obtained from other public or non-public sources. This risk assessment may have consequences for the level of your insurance premium. If a decision has been taken automatically, you can ask for it to be reconsidered by one of our employees. If there is a record of fraud, your application will always be assessed by one of our employees.

C. How we deal with data

1. Securing your data

We make every effort to protect your data as much as possible. We invest a great deal in our systems, procedures and people. We ensure that our working methods are appropriate for the sensitivity of your data. We train our employees to handle your data securely and they are required to keep them confidential. Only employees who need to access your data to perform their work are permitted to do so. We constantly monitor the security of our data traffic. We take action immediately if anything goes wrong. We resolve and record any data breaches. We are obliged to do so by law. We report them to the supervisory authority and, if necessary, to you.

2. Your data outside Europe

Your data are generally processed within the European Union (EU). In some cases, personal data are processed outside the EU. Some of our suppliers and cooperation partners are based outside the EU or provide their services outside the EU. The regulations in these countries do not always offer the same protection of personal data as European regulations. In order to ensure that your personal data nevertheless remains safe, we take appropriate measures in such cases by entering into agreements containing comparable provisions on the security of personal data. In other words, just as we do within the EU.

3. How long do we retain your data?

The basic principle is that we will retain data at least as long as necessary to fulfil the purpose for which we obtained the data. How long we keep data depends on a number of criteria.

The General Data Protection Regulation (GDPR) includes no specific retention periods for personal data, although other laws may do so. We are then required to retain the data for the specified length of time. Examples include tax laws or legislation applying specifically to financial undertakings (Financial Supervision Act). In most cases, we will retain your data for up to seven years after the termination of your insurance with us or up to seven years after the settlement of your claim.

We may also become involved in a court case or other proceedings in the Netherlands or abroad. We retain data, among other things, in order to prove the circumstances of the case. We may retain data on file until any claim is time-barred and we can no longer be involved in any proceedings.

D. The GDPR rights and complaints

1. What are your rights?

Access, rectification, deletion and restriction

You are entitled to request a summary of all data we process about you. This means you can enquire about the personal data we have recorded and the purposes for which we use them. If your data are incorrect, you can request us to rectify them. In some cases, you can also ask us to erase your data. That is not possible in all cases, for example, if we are required by law to keep your data for longer. You can also request us to temporarily restrict the use of your personal data. You can do so if:

- You believe your personal data are incorrect.
- We are using your personal data improperly.
- We wish to destroy your personal data, but you still need them (for example after the retention period).

Right to object

You can object to the processing of your personal data if you believe we are using them for purposes other than those necessary to perform a contract or to comply with a statutory obligation. We will assess your objection carefully and, if necessary, stop processing your personal data.

Right to data portability

We can arrange for you to receive the data that you provided to us and that we store in computerised form to perform a contract. This is known as 'data portability'. You can also request us to send those data directly to another party.

Make sure your data are secure. Check whether the party to which you wish to provide your data can be trusted and will handle your data as securely as we do. If you wish to receive your data, make sure your own equipment is sufficiently secure and has not been or cannot be hacked, for example. Your financial data may be of great interest to criminals.

2. Exercising your rights

Would you like to exercise any of the above rights? If you wish to exercise any of the above rights, you can send a written request to dpo@abnamroverzekeringen.nl. Your request must include your name, address, telephone number, policy number and a copy of a valid ID in which the citizen service number (BSN) and passport photograph have been covered.

When submitting your request, please also let us know the background so that we can help you as effectively as possible.

3. What to do if you have a complaint or anything is unclear

We have a data protection officer within our company whom you can contact at dpo@abnamroverzekeringen.nl. You can contact our data protection officer if you have any questions about the Privacy Statement or if you would like to file a complaint if you disagree with the way we handle your data. Of course, you also have the right to file a complaint with the Dutch Data Protection Authority (Dutch DPA) (www.autoriteitpersoonsgegevens.nl).

Amendments to the Privacy Statement

Changes may occur in the way we use personal data due to changes in laws and regulations or changes in our services and products that have direct consequences for our use of your personal data. In such cases, we will amend the Privacy Statement.