

Privacy statement

Who are we?

Your data is processed by Den Hartigh Adviesgroep B.V. and/or Den Hartigh Serviceproviding B.V. and/or Den Hartigh International B.V. These legal entities are part of Den Hartigh Beheer & Exploitatie B.V. and in this privacy statement will further be referred to as Den Hartigh Beheer & Exploitatie B.V.

We are an insurance broker and because of the size of our business we can offer you a wide range of services. We can advise and mediate regarding investment products, personal benefits, employee benefits, non-life insurance and health insurance.

In addition, we are an authorised agent. An authorised agent is an professional financial service provider who conducts business on behalf of an insurance company. This includes drawing up quotations, accepting and updating insurance contracts, maintaining the policy administration and dealing with claims.

Processing your data

When providing our services we process personal data such as your name, address, telephone number, e-mail address, date of birth, bank account number, and the like. And if you contact us or visit the website, we process your data too. Den Hartigh Beheer & Exploitatie B.V. respects your privacy and this is why we process your data with the utmost care and in compliance with prevailing legislation and regulations regarding personal data protection. We ensure that the personal data we process is accurate, adequate, and relevant, and that it is not excessive.

The Dutch Code of Conduct for the Processing of Personal Data by Financial Institutions (Gedragcode Verwerking Persoonsgegevens Financiële Instellingen) is applicable to the processing of personal data. You can read the full text of this code of conduct on the Dutch Association of Insurers (Verbond van Verzekeraars) website (www.verzekeraars.nl). You can also request a copy of the code of conduct from the Dutch Association of Insurers.

Why do we process your data?

Den Hartigh Beheer & Exploitatie B.V. may process your personal data for the following purposes:

- To act as adviser and broker, and as manager of the financial products you have purchased;
- To assess and/or accept and/or process an application and to fulfil an insurance agreement or financial service;
- To conduct analyses to expand our customer base, to improve our products and services, and so that with our products and services we can better respond to your personal situation;
- To conduct marketing activities to establish, maintain and develop a good working relationship with you;
- To conduct scientific, statistical and/or market research;
- To guarantee the security and integrity of the financial sector, including implementing measures to prevent and counter fraud against Den Hartigh Beheer & Exploitatie B.V. and other financial institutions.
- To comply with legislation and regulations.

For what purposes may we process your data?

We may process your data for at least one of the following reasons:

- If you have given us explicit permission (you may also withdraw this permission later);
- If this is necessary for us to fulfil the agreement we have with you;
- If this is necessary for us to fulfil our legal obligations;
- If this is necessary to protect your vital interests or those of another person;
- If this serves our legitimate interest, whereby we also take your interests into consideration.

How long will we keep your data?

The period for which we keep your data depends on the purpose for which we process it. This may vary per situation. We will not keep your data for longer than is necessary for the purpose for which we process it. We may keep data for longer if there is a legal obligation to do so and we also keep data so we have evidence in the event of a complaint and/or legal proceedings. We may anonymise your data and store it in our archive for historical, statistical or scientific purposes and/or for further developing our products and services.

Access and processing by external sources

To conduct a fair policy for acceptance, claim settlement and fraud prevention, we may also collect information about you from external sources that we consider reliable. For example, we may contact the Dutch Motor Vehicle Registration Department (RDW – Rijksdienst voor het Wegverkeer) and credit registration service providers. We may also consult your personal data held by the Central Information System Foundation (CIS – Stichting Centraal Informatie Systeem). This foundation stores information for insurers and their authorised agents. Under certain conditions we can request information about you be stored in this system. You can find more information on www.stichtingcis.nl.

Special personal data

Sometimes we process special personal data such as data about your health and/or criminal record. We take extra care when processing special personal data. If we require information about your health to assess an application, then we will ask for your permission to use this data. Data about your health that we use for processing a claim is only used by those employees who actually need this data to fulfil their duties.

As part of our fair policy for acceptance we can request information about your criminal record. Again, this information is only processed by employees who need this data to fulfil their duties. We do not collect data about a person's race, religion, personal beliefs, political preferences or sexual orientation.

Telephone calls

To improve the quality of our services and to combat fraud we may record our telephone calls. Recorded conversations may be used for training purposes and, if necessary, to verify the agreements made with you. The conversations will not be kept for longer than necessary.

Automated processes

We have partially automated the procedures for accepting and modifying insurance contracts. This procedure uses acceptance and other criteria and consults external sources. An employee will conduct a manual assessment if required.

Sharing your data with third parties

Your data may also be shared with third parties to enable us to conduct the procedures described above under 'Why may we process your data?' The term 'third parties' includes, but is not limited to: your insurance adviser/broker, financial institutions (such as banks and insurance companies), damage assessors, repair organisations and debt collection agencies. Your personal data may be passed on to third parties if you have given permission for this, or if we are required to do so by law (for example to the police or judicial authorities). We will only provide information to countries outside the European Economic Area (EEA) if this is fully in accordance with legislation and regulations. To guarantee your privacy we document agreements with third parties in written contracts.

Using the website

For its website, Den Hartigh Beheer & Exploitatie B.V. keeps a record of visitor data, such as the most frequently requested pages. We do this so we can structure our website to best meet the needs of you as visitor or client. We also use the data to place specific information and special offers on the website.

If you use our website, cookies will be placed on your device. Many websites do this, because cookies make it easier for you to use a website. A cookie is a small text file that is stored on the hard drive of your device. It contains information that you enter on the site. A cookie cannot contain a virus.

Den Hartigh Beheer & Exploitatie B.V. uses cookies for the following purposes:

- To make it easier for you to use our website. For this we use temporary cookies, which are deleted when you leave our site.
- To measure repeat visits to our site. This involves cookies that remain on your device unless you remove them.
- To ensure that we don't ask you the same thing twice, for example to complete our customer satisfaction survey.
- To save user settings and other information for when you visit our site again.

If you do not want us to use cookies, change the setting in your browser to 'Cookies off'.

Securing your data

We take the necessary technical and organisational measures to protect your personal data. We do everything we can to ensure that your data is accurate, complete and confidential and to protect it from misuse and unauthorised access.

Your rights

You can ask us for an overview of your data that we process. If you consider the data we have about you to be incorrect or incomplete, or you consider it not necessary that the data is processed, you may request that we add to, modify or remove your data. You may also request us to transfer your data to another organisation.

You should submit your request in writing to our data protection officer. We will respond to your request within four weeks.

Den Hartigh Beheer & Exploitatie B.V.
Attn. Data protection officer
Biezenvijver 7
3297 GK Puttershoek, Netherlands
E-mail: boekhouding@denhartigh.com

Please enclose a copy of your identity document with your request, so that we can be certain the request comes from you. To protect your privacy, black out your photo and personal public service number in the copy of your identity document.

It may not be possible for us to honour your request. Naturally, we will discuss this with you to find a solution. Unfortunately, this is not always possible. If you do not agree with our position about the request you submitted or the solution we propose, you may submit a complaint to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

Changes to this privacy statement

We may modify the text of this privacy statement due to new developments in our business activities or in response to changes to legislation and regulations. The most recent version is then applicable. You will always find the most recent version of our privacy statement on our website.