

## Privacy policy of Vandeni Kindlustusmaaklerid AS

28.11.2018

- Privacy policy determines how Vandeni Kindlustusmaaklerid AS (hereinafter “broker”) processes the personal data of clients, policyholders, insured persons and beneficiaries, and other persons provided in the insurance contracts (hereinafter “persons”) with regard to insurance mediation and insurance marketing.
- The controller of the personal data is Vandeni Kindlustusmaaklerid AS (registry code 10613620, seat Tornimäe 7 10145 Tallinn, tel +372 616 4550, email [info@vanden.ee](mailto:info@vanden.ee)).
- The broker processes the personal data of insured persons to market insurance, mediate the conclusion of insurance contracts to policyholders as the insurance broker, assist in performing the insurance contract, and to provide other services of the insurance broker.
- The broker considers the protection of personal data and the privacy of individuals very important, therefore, it shall limit the processing of personal data to the minimum necessary. Our activities are based on these personal data protection rules, the European Union General Data Protection Act (GDPR), other personal data protection laws, and internal rules on personal data protection. The broker makes the best efforts to ensure the security and protection of personal data.
- The broker processes personal information to accept insurance application, carry out risk analyses, determine insurable interest, request insurance offers from insurers, prepare overviews of insurance offers and forward them to the clients, prepare the insurance contract documents, assist in the insurance contract performance, administration and in case of an insured event, and also to provide other services of insurance broker.
- The broker processes the following personal data: name, personal identification code, address, place of residence, telephone number, email address, bank account number, age, date of birth, destination and period of travel, details of the insured item, and data on loss events.
- The broker processes the following specified personal data to market and mediate the accident insurance, sickness insurance, and life insurance contracts: personal health data.
- The broker processes personal data to perform the contract concluded with the client, including brokerage contract (hereinafter “contract”).
- The insurance broker processes personal data to market, mediate, and conclude the insurance contract, and to assist in the performance thereof based on the Insurance Activities Act without a separate consent of the person. The insurance broker needs the consent of the person if specified personal data is to be forwarded to service providers who are neither insurers nor insurance intermediaries. The person agrees to the processing of personal data according to the insurance offer, other brokerage or insurance document to which it is clearly referred upon giving consent.
- The broker forwards the data of persons to insurance intermediaries and insurers, and also to its processor, including the insurance information system provider, other service providers, and to protect its own rights and perform legal obligations (for example, to an auditor, accounting and legal service provider, collection company, investigative bodies, etc.).
- Inter alia, the broker forwards personal data to US insurer Willis Tower Watson based on the US decision on adequacy adopted by the European Union.
- Insurers, insurance intermediaries, and other partners of broker (processors to whom the broker forwards personal data) also process personal data for the purpose of measuring the consumption habits and user experience of persons, for (profile) analysis and statistics, and the person agrees with this according to his or her consent given with the insurance offer. The person has the right to withdraw the consent at any time by sending a written notification to the contacts provided on the website of the broker at <http://www.vanden.ee>.



- The broker receives personal data from the person himself or herself, the policyholder, and other person who has insurable interest or consent from the person on forwarding personal data.
- The broker keeps personal data confidential and does not disclose such data for purposes not included in the privacy policy.
- The broker retains personal data until the termination of the brokerage contract, insurance contract or other contract, and then – for the protection of its legitimate interests – until the expiry of the limitation period for claims arising from the contract.
- A person has the right to receive information on the basis of a written request about what kind of personal data is processed about him or her, require the correction and updating of personal data, require the deletion of personal data (in this case, it is not possible to continue to provide services to the person), withdraw the consent for the processing of personal data (in this case, it is not possible to continue to perform the contracts), and require that he or she would not be subject to automated data-processing decisions.
- We use cookies on the website at <https://vanden.ee/>, and these are text files that are uploaded to the device of the website or website visitor. Cookies are stored on the hard disk of the device in the web browser's file catalogue (e.g. Internet Explorer, Firefox). Cookies enable to recognise the user when the user enters the website in the future, determine the user's interests and preferences, analyse the user's choices and offer better terms of use based on this, and forward the user offers and advertising through the website. Cookies do not jeopardise the settings of the website. We use cookies to ensure that the person who has already visited the website does not have to re-enter the previously entered data.
- The broker has the right to change the privacy policy by giving one (1) month's notice on its website at <https://vanden.ee/>. Upon disagreement with the new privacy policy, the person has the right to terminate the contract(s).
- By using the broker's services or website at <https://vanden.ee/>, the person agrees to the processing of personal data according to the privacy policy.

