

DATA PROTECTION NOTICE

Many thanks for visiting our website and for your interest in ACE. Protecting your data – both on our website and elsewhere – is extremely important to us. Below we have provided comprehensive information relating to data protection at ACE. If you have any questions about data protection issues, please get in touch with our [data protection officer](#).

Data protection: Background and definitions

Data protection in Germany is primarily governed by the German Data Protection Act (Bundesdatenschutzgesetz, BDSG). The purpose of this act is to ensure that individuals' personal rights are protected when their personal data are being handled. The German Criminal Code (Strafgesetzbuch, StGB) imposes penalties for the disclosure of confidential personal information. Such confidential personal information includes, for example, any information relating to private health, accident or life assurance. Other laws, such as the German Teleservices Act (Telemediengesetz, Sections 11 et seq. TMG), also incorporate data protection components.

The general rule that applies is that companies may only collect, process and use the data that they actually require. In many cases, the consent of the person affected is required to collect (i.e., procure), process and use their data. Such processing comprises the storing, altering, transfer, blocking and deletion of personal data.

What are personal data?

Personal data, within the meaning of the BDSG, relates to specific information concerning personal or factual issues for a specific, or identifiable, natural person. Examples of personal data include the following: name, address, date of birth, nationality, telephone number, occupation, bank details; information about your health (in doctors' opinions, insurance applications etc.), your income (e.g. the so-called "scoring" of credit enquiry agencies, etc.) and financial credit history. Pursuant to the BDSG, special protections govern all of this information.

When will ACE collect, process and use my personal data? Anonymous browsing, cookies, statistical analyses from the Internet

You can visit our website without notifying us of who you are. We will only obtain anonymous information about the name of the Internet provider, the website from which you are visiting us and the pages of our website that you view. This information is evaluated for statistical purposes. You remain anonymous as an individual user.

Information is provided for our customers and business partners on our general pages and strictly no personal information is collected or processed here. Some of our web pages use **cookies**. Cookies are small text files that are stored on your computer and saved by your browser. They do not contain any personal data and cannot be assigned to any specific person. Most cookies are deleted when you leave our website. Your browser settings allow you to define yourself whether and how your computer accepts cookies.

Encryption/secure web pages

Where you input your data through an ACE web page, these data are retrieved and processed in a secure area using Secure Socket Layer (SSL protocol) technology or a similar technology. This ensures that the data that are passed back and forth between your PC and the website are encrypted. You need an SSL-enabled Internet browser in order to fully benefit from this technology. This will activate SSL automatically. If you are using Internet Explorer or Netscape Navigator, you can check if you are in a secure area. You will see a key or padlock symbol in the bottom-right corner of your browser screen. A complete key or a closed padlock indicates that you are in a secure area.

If you are on a secure page, the network address will be preceded by "https".

Personal data in E-mails, for online applications, conclusion of a contract, etc.

If you send us an E-Mail, the data that are transferred (the E-Mail address and data that you provide us with, e.g. first name/surname) will be stored in our E-Mail systems and may also be stored in other systems. Should you apply for, or conclude, an insurance agreement on our product pages, the necessary data will be collected. When we collect this data, we will ask you for your consent so that we can collect, process and use it. If you do not give your consent, you cannot conclude an agreement.

Above and beyond this, personal data are only collected if you have given your consent for this. When a claim is being processed, your consent will be sought if, for example, we wish to question a doctor in relation to your health. From time to time, ACE may perform online surveys of customers and visitors in order to better understand customer needs and experiences. Participation in these surveys is voluntary.

Other data collection

Aside from the Internet, we also collect personal data during applications, when agreements are concluded, for insured events and during job applications. Once again, we will seek the consent of the person involved here. The data will be destroyed if they are no longer required or if a statutory retention obligation period has elapsed.

Processing of the data

Your health data and additional data protected under Section 203 StGB are stored in the ACE Group's special secure IT systems. Your data are exclusively read and processed for the purposes for which you have provided it to us. These usually include examining your application, preparation of your insurance certificate, the collection of insurance premiums, consultation and the provision of insurance services. Personal data are held securely pursuant to our internal security policy and legal requirements.

Your health data are only accessible to a limited group of people within the German Office (Direktion für Deutschland) of ACE European Group Limited. Your other data (e.g., commencement of insurance, your address) can be viewed by other ACE employees, e.g., in order to process your policy.

Our employees are not authorised to pass personal data on to unauthorised third parties. They are obliged to only use data for specific purposes and to treat data in the strictest confidence. This non-disclosure obligation remains in force beyond the term of our employees' employment relationship.

Data transfer

Non-disclosure agreements are in force in cases where we exchange personal data with third parties, e.g., ACE's intermediaries and subsidiaries. Personal data are also only exchanged with intermediaries or subsidiaries following your explicit consent. Companies that provide services to us are obliged to meet our strict data protection requirements. These companies may also only process personal data in the context of their services or in conjunction with your assignment.

Examples for such service providers include incident managers who provide services in an emergency, for instance in relation to a travel insurance policy, or a print shop printing insurance certificates. Please see [here](#) for a list of the locations (and categories of location) that collect, process or use health data for ACE European Group Limited in Germany.

Any other transfer of personal data and other information will only occur:

- in order to meet statutory requirements or to follow legal process;
- in order to register or collect receivables to which the company is entitled, or in order to protect our rights and our property;
- in order to prevent fraud.

What rights do you have in respect of the data you provide to us?

Under the provisions of the German Data Protection Act (Bundesdatenschutzgesetz, BDSG) and the Tele Services Data Protection Act (Teledienste-Datenschutzgesetz), you have a right to free and prompt information about the personal data held by ACE. This information will be supplied to you at your request. You also have the right to the correction of inaccurate information and to the blocking or deletion of data. Where you have consented to us using your personal data, you may revoke this consent at any time. In all such cases, please contact ACE's [data protection officer](#) without delay.

Insurers' code of conduct in respect of data protection and distribution

The Association of German Insurers (Gesamtverband der Deutschen Versicherungswirtschaft e.V., GDV), as the industry's primary association in Germany, has developed a self-regulatory code of data protection conduct in conjunction with the German data protection authorities. The Bundesverband consumer advice centre was also involved in the discussions. Like many insurers in Germany, ACE is a member of the GDV and will sign the code of conduct governing data protection.

1. The code of conduct in respect of data protection

The text of this code of conduct will shortly be available here.

2. Declarations of release from professional secrecy

ACE's declarations of release from professional secrecy were prepared based on the guidelines from the GDV and the German data protection authorities. Passages that were not required were deleted and the necessary information was added, in line with the requirements. Following your application, we will send you the appropriate form for your product. Attached to the declaration is a list of our service providers and other locations where we transfer your data. You will find the list [here](#).

Code of conduct for distribution

The GDV has also prepared a **code of conduct for sales and distribution**, which is designed to defend consumers' interests. ACE has also signed this code. You will find details here:

<http://www.gdv.de/verhaltenskodex-fuer-den-vertrieb/>

<http://www.gdv.de/wp-content/uploads/2012/09/Verhaltenskodex.pdf>

Data protection officer

If you have any questions in relation to the processing of your personal data, please get in touch with our [data protection officer](#). You are also free to contact our officer in order to request information or if you have any comments or complaints in relation to data protection.

Datenschutzbeauftragter@acegroup.com

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