

## PRIVACY STATEMENT LÉONS

Léons is a group of independent companies, acting as an insurance broker and consultant in the field of risk management, employee benefits and insurance. Léons can also act as a representative of insurers and as a local representative in the international network Brokerslink. Léons strives to protect the privacy and confidentiality of personal data that the company processes in connection with the services that it provides to its customers.

Léons's services consist mainly of risk advice and insurance mediation to enable customers to consider, use, manage and file insurance related claims.

## IDENTITY OF DATA CONTROLLER AND CONTACT DETAILS

For this explanation, Léons (Léons, we/us or our) means the following entities with legal personality, each of which acts on its own behalf:

- M.N. Léons B.V.
- Léons Consultancy B.V.
- MNL Assuradeuren B.V.

all established at De Boelelaan 1065, 1082 SB Amsterdam

Léons is the data controller of the personal data that we process in the context of our services. In certain cases, we may have reached an agreement with you that we will function as a processor for certain services. When we function as a processor, we will fulfil the obligations laid down in the agreement that we have concluded with you.

## USE OF PERSONAL DATA

Our services pertain to the processing of personal data (this is data that could be traceable to a natural person), such as:

- Personal details, such as name, address (and proof of address), other contact details (email and telephone details), gender, marital status, family information, date and place of birth, employer, position and employment history. Also, data required for identification, such as a passport number or Social Security Number.
- Financial information, such as a payment card number, bank account number and account details, income and other financial information, data relating to credit history and bankruptcy or moratorium status.
- Data relevant to the risk that is to be insured, as well as policy information, information about the quotations received by individuals and the policies that they acquire.

- Data about damage claims, both damages in the past and pending claims, including eventual other categories of data, if relevant regarding these claims.

In addition, we can process special data, such as criminal data or health data for, for example, taking out an accident insurance, health or professional liability insurances and also for handling claims. We will only process the data that is necessary for our service. If certain information is not provided, it could imply that it will not be possible to provide the requested services, or to settle or compensate any damages. When you provide information to us of third parties (your partner, children, co-insured persons or details of persons in case of emergency situations), we assume that you have informed them about the processing of their data by Léons and that you have referred them to this privacy statement.

In addition to the information that you provide, we may gather information from third parties, such as:

- You and your family members
- Your employer
- In the event of a damage claim, third parties, including the claimant, defendant, witnesses, experts (including medical experts), damage experts, lawyers and insurance claim handlers
- Insurers
- Credit information agencies (insofar as we run credit risks)
- Anti-fraud databases and other external databases, including sanction lists
- Public authorities, such as vehicle registration and tax authorities

## OBJECTIVES PROCESSING PERSONAL DATA

Léons processes the data in the context of its business operations and services. This includes, amongst others:

- Delivering the services requested by - or on behalf of - you
- Mediating in the realisation of insurance policies
- Damage handling
- Investigating claims or complaints in connection with insurance policies or services
- Consultancy in the field of risk management
- Advice with regards to pensions and absenteeism counselling
- Research into customer satisfaction
- Internal reporting, statistical analysis, introducing products and services of Léons onto the market and improvement of products and services.
- Creditworthiness and debtor policy investigations
- Research into imposed sanctions, validation of data, facilitation of prevention, detection and/or investigation into crime
- Compliance with legal obligations
- Offering other products that may be of interest to you

#### LEGAL BASES PROCESSING PERSONAL DATA

Implementing the agreement: in the context of our services and entering into agreements, we collect and use the necessary personal data for making an offer, the realisation and execution of the agreement.

Compliance with a legal obligation: the processing of data may be necessary for compliance with legal obligations. Léons, for example, is subject to a license under the FMSA and is supervised by the CCD. Léons is obliged to comply with the applicable regulations.

Legitimate interest: the gathering and use of certain data is necessary to fulfil legitimate commercial interests, for example, offering products that may be of interest to you or doing market research to improve our products and services. When we process your data on this basis, we will take the necessary measures to prevent the processing being an infringement of your rights and freedoms under the privacy legislation.

Permission: we process data on the basis of permission when we process special data in combination with, for example, profiling. You are always at liberty to withhold or withdraw the permission. In this case it may not be possible to implement our services. Where special data is required and you wish to make use of our services, you must agree to the gathering and use of this special data.

#### PROVISION TO THIRD PARTIES

We engage third parties in the context of our services. We can provide data in this context to:

- Insurers and intermediaries, where necessary, for taking out insurances and providing our services.
- Expertise bureaus, lawyers and investigation bureaus for work in case of damages and necessary reports.
- Investigative authorities, where necessary, to prevent or detect fraud and crime.
- Government agencies, where necessary, for Léons to meet its legal obligations. In the context of vehicle insurance policies, data is passed on to the Road Transport Directorate.
- Third parties in case of outsourcing of work. This work will be carried out under the responsibility of Léons, in accordance with our security standards and our instructions.
- Legal successors, in case of the sale of the service to another organisation or takeover or the sale of (a part of) Léons. If, in this case, personal data is shared, the data will continue to be used in accordance with this statement.
- Medical experts, for example, in the case of health insurance and claim handling services.

- Investigation agencies that are engaged to investigate creditworthiness, criminal record, fraud (and issuing declarations of conduct) in order to detect and prevent fraud in the insurance industry.

#### INTERNATIONAL TRANSFER OF PERSONAL DATA

We provide Personal Data, or grant access to Personal Data, to countries outside the European Economic Area (EEA). The legislation in these countries regarding data protection does not always offer the same level of protection of Personal Data as offered in the EEA. We will protect Personal Data in all cases as described in this Privacy Statement.

Certain countries outside the EEA have been approved by the European Commission as being countries that offer essentially the same protection of Personal Data as under the laws on data protection in the EEA. Based on the EU data protection laws, we may provide Personal Data freely to these countries.

#### SECURITY

We have physical, electronic and procedural safeguards built in, tailored to the sensitivity of the information we retain. These safeguards may vary, depending on the sensitivity, layout, location, quantity, distribution and storage of the personal data and include specific measures to protect personal data from unauthorised access. If applicable, the safeguards include, amongst others, separate servers for storage of data, firewalls, access controls, separation of functions and similar security protocols. We limit the access to personal data, namely to staff and third parties who need access to such information for legitimate, relevant business purposes.

#### LIMITATION OF GATHERING AND STORAGE OF PERSONAL DATA

We gather, use, provide and process personal data as required for the purposes mentioned in this privacy statement, or as permitted by law. If we should need personal data for a purpose that is not consistent with the purposes stated in this privacy statement, we will inform you about the new purpose and, if necessary, we will ask you and the persons concerned for permission (or ask other parties to do this on our behalf) in order to process the personal data for the new purposes.

Our retention periods for personal data are based on our business needs and legal requirements. We retain personal data for as long as necessary for the processing purpose(s) for which the data was collected, any other permissible related purpose, or as required by law.

For example, we may retain certain transaction data and correspondence until the time limit for claims that arise from the transaction has expired, or to comply with the legal requirements concerning the retention of such data.

#### ACCURACY OF THE DATA

We rely on the correctness of the information that is known to us in order to execute our services in the correct manner. You should therefore also inform us about any changes in your data.

#### ACCOUNTABILITY, TRANSPARENCY AND RIGHTS

You have the following rights with regard to the data that we process about you:

- The right to inspect the processing of your personal data by Léons.
- The right to have this data corrected, arrested and/or deleted, especially when the processing of the data is no longer necessary.
- The right of objection against the use of data for marketing purposes.
- The right to the further processing of your personal data.
- You can also request us to transfer your details to another party.

Some of these rights can only be exercised in certain cases. If we are unable to follow up on a request, we will inform you accordingly.

In order to exercise these rights and to obtain further information about this privacy statement, you can contact the compliance department via an email to [documents@leons.nl](mailto:documents@leons.nl).

Léons will retain your data for as long as necessary for the purposes for which the data was processed. In addition, Léons must keep records in view of the file and safety responsibility obligation and legal position and further to comply with legislation and regulations.

Your opinion will be appreciated. If you have any comments or questions about our privacy statement, please send them to [documents@leons.nl](mailto:documents@leons.nl), or write to us at the address mentioned earlier in this statement.

If you have any complaints about the processing of your personal data by Léons, please let us know. You can contact us in this regard and we will look at solutions together with you. You have the right to file a complaint with the data protection supervisor, the Personal Data Authority (via [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)).

This privacy statement is not an agreement and we can update this privacy statement. The last amendment dates from 1 May 2018. If we make any amendments to this Privacy Statement, we will update the date on which it was last amended. Amendments that we make to this Privacy Statement will take effect immediately.