



DUPI GROUP

PRIVACY POLICY



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We care about your personal data

DUPI Group B.V. and its subsidiaries (hereinafter: "DUPI") ("we", "us", "our") are one of the leading Managing General Agents in the Benelux acting for multiple renowned European insurers.

We provide customized Marine, Transport, Property, Casualty and Construction insurance solutions for various business risks mainly in, but also outside Europe.

But we do more than that. Our group companies FrameStory Software B.V. and FrameStory Software Bulgaria Ltd. create custom software for brokers, insurers and underwriters with special administrative needs. And our group company Delta Risk Consulting B.V. is specialized in risk inspections, risk management, construction supervision and prevention and aims to make business risks transparent for entrepreneurs, insurers, underwriters and intermediaries.

Our head office is in Rotterdam, but we also have offices in Amsterdam, Schiedam, Cologne, Paris, Copenhagen and Plovdiv (Bulgaria).

Protecting your privacy is a top priority for us. Below you can read how and what type of personal data we collect, why we collect this data and to whom this data may be disclosed.

1. Who is the data controller?

A data controller is a natural or legal person who determines the purposes and means of the processing of personal data and is responsible for keeping and using personal data in its (electronic) files. DUPI is the data controller as per relevant data protection laws and regulations.

2. What personal data will be collected?

We may collect and process various types of personal data as below:

- Surname, first name;
- Address;
- Date of birth;
- Gender;
- Identification document number;
- Telephone number;
- Email address;
- Bank account details;
- Other information.

In certain cases we may also collect and process sensitive personal data about you, such as medical data or claims history.

3. How will we obtain and use your personal data?

We will collect and use the personal data that you provide to us and that we receive about you for a number of purposes and with your explicit consent unless applicable laws and regulations do not require us to obtain your explicit consent (as shown below).

In principle, for insurance contracts that do not involve sensitive/special categories of personal data, consent is not required under Article 6(1)(b) GDPR, whereas for insurance contracts that do contain sensitive/special categories of personal data, consent is required according to Article 9 (2)(a) GDPR.

Purpose	Consent required?
Insurance contract administration (quotation, underwriting, claims handling)	No. Your consent is required only when we process sensitive personal data (unless the processing may be based on a legal obligation, on the establishment, exercise or defense of legal claims, or when courts are acting in their judicial capacity).
Administer debt recoveries.	No.
To inform you about products and services that we believe will interest you in accordance with your marketing preferences. You can change them at any time by contacting us as indicated in section 8 below.	Yes.
Fraud prevention and detection	No.
Meet any legal obligations (tax, accounting and administrative obligations)	No.
Risk redistribution through reinsurance and co-insurance.	No.

For the purposes indicated above, we may process personal data that we receive about you from public databases, third parties such as brokers and business partners, insurers, credit reference and fraud prevention agencies, advertising networks, analytics providers, search information providers, loss adjusters, appraisers, intermediaries, delegated authorities and attorneys.

For the purposes listed above where we have indicated that we do not require your explicit consent or where we otherwise need your personal data to underwrite your insurance product and/or process your claim, we will process your personal data based on our legitimate interests and/or to comply with our legal obligations and/or the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity.

When we process your personal data based on our legitimate interests, we believe that these interests do not outweigh your interests or fundamental rights and freedoms that require protection of your personal data.

We may need your personal data if you wish to purchase our products and services. If you do not want to provide personal data to us, we may not be able to provide the products and services you request or are interested in, or to tailor our offerings to your specific requirements.

4. Who will have access to your personal data?

We will ensure that your personal data is processed in a manner that is compatible with the purposes indicated above.

We keep your personal data on a (secured) server. For the purposes stated above, we may disclose your personal data to:

- Public authorities, other DUPI entities, insurers, co-insurers, re-insurers, insurance intermediaries/brokers, banks, technical consultants, experts, lawyers, loss adjusters and medical doctors.

We may also share your personal data in the following instances:

- In the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in any insolvency or similar proceedings); and
- To meet any legal obligation, including to, if applicable, the relevant ombudsman or applicable supervisor authority if you make a complaint about the product or service we have provided to you.

5. Where will your personal data be processed?

Your personal data may be processed both inside and outside of the European Economic Area (EEA) by the parties specified in section 4 above, subject always to contractual restrictions regarding confidentiality and security in line with applicable data protection laws and regulations.

6. What are your rights in respect of your personal data?

You have the right to:

- Be informed about the processing of your information;
- Access your information;
- Rectify and correct your information in case this is incorrect;
- Limit the processing of your data;
- Protest against the processing of your data;
- Not be valued and/or stored on the basis of choices made by automated systems or profiles;
- Data transfer (from DUPI to another data controller/processor);
- Erase your information. DUPI is required to delete without undue delay your data if:
 - a. This is not contrary the law;
 - b. You withdraw your active consent;
 - c. You request this from DUPI.

If you want to exercise these rights, please contact us stating your name, email address, account identification, and the purpose of your request. You can contact us via the contact details indicated in section 8 below.

7. How long do we keep your personal data?

According to our data retention policy we store your data generally for 7 years from the expiration date of your insurance policy, the date a claim is settled or our business relationship has ended.

In certain cases we may need to store your data for an extended period, but we will only do so if this is required and permitted by law and if it is necessary from our side.

We will keep your personal data only for the purposes for which it was obtained by us.

8. Contact

If you have any questions about how we store or use your personal data you can contact us as follows:

- Per letter:
DUPI Group B.V.
Legal & Compliance Department
Blaak 16 th floor
3011 TA Rotterdam
The Netherlands
- Per email:
compliance@dupi.com

9. Changes

We reserve the right at any time to change our Privacy policy. On this page you will always find the most recent version. For that reason, check our Privacy policy on this website regularly.

<https://dupi.com/privacy-policy/>

This Privacy Policy DUPI Group was approved by the DUPI Group Executive Committee on 05-09-2023

