



Data protection policy

Qualibroker AG | Zürich

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To improve the readability of the text, no distinction between genders has been made in this document. All terms used to denote persons refer equally to all genders.

1. Version control

1.1. Change control

Date	Version	Name	Description
31/10/2018	1.0	Rolf Badat	Creation
21/06/2019	2.0	Rolf Badat	Amendment of data subject rights

1.2. Approval

Date	Version	Name	Description
31/10/2018	1.0	Urs Thalmann	Managing Director

Signature:



21/06/2019	2.0	Urs Thalmann	Managing Director
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Signature:



1.3. Outstanding issues

Date	Name	Topic
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2. Data protection policy

2.1. General provisions

Qualibroker AG is a provider of tailor-made insurance and risk solutions. It offers services in the field of occupational pension provision, personal, property, liability and other non-life insurance, and risk management.

In this data protection policy, Qualibroker AG would like to inform you of how it complies with the applicable data protection regulations. The Qualibroker AG data protection policy is based on the security and data protection rules in force at Qualibroker AG.

2.2. Content and purpose

The activities undertaken by Qualibroker AG as an insurance broker involve the handling (receiving, saving, modifying, disclosing, etc.) of personal data ('personal data' or 'data') concerning customers, clients and employees. This also includes health data that requires greater protection. The processing of this data is essential in order to offer tailor-made solutions and to enable correspondence with customers and insurers.

Qualibroker AG considers the protection of personal data an essential part of the service it provides to its customers. Data protection is therefore one of the most important aspects of the company's principles of conduct.

2.3. Source and categories of data processed

The personal data processed by Qualibroker AG includes data provided by policyholders, insurers, insured parties and authorised third parties, as well as publicly accessible data. The data categories are:

- Customer details (e.g. name, address, date of birth, gender, nationality, creditworthiness data)
- Data from applications, including the corresponding supplementary questionnaires (such as applicant information on the insured risk, answers to questions, expert reports, information from the previous insurer on previous claims)
- Data from contracts with insurers (e.g. contract term, insured risks, cover, data from existing contracts)
- Collections data (e.g. date and amount of premiums received, outstanding amounts, reminders, credit, payment information)
- Any loss data (e.g. claims notices, investigation reports, accounting records, data on third parties who have suffered damage)

No data is obtained from other third parties.

2.4. Disclosure of data to third parties

Qualibroker AG uses various outsourcing partners, which assist it in performing data processing connected to its activities as an insurance broker: IT is outsourced and specialist software companies handle the development, modification and maintenance of the insurance broker software and the document management system. Accounting services, document shredding and postal services are also outsourced to partners. Qualibroker AG's close collaboration with its sister company in Liechtenstein, Schreiber Maron Sprenger AG, means that personal data held by Qualibroker AG may also be handled by employees of the sister company.

All contractual partners for outsourced activities are selected carefully by Qualibroker AG. Qualibroker AG obliges the contractual partners to comply with data protection requirements and monitors compliance on an ongoing basis. Qualibroker AG remains responsible for compliance with data protection requirements.

2.5. Storage period

Qualibroker AG processes personal data for the duration required to fulfil the above-mentioned purposes. The statutory retention period of 10 years applies for business documents (Art. 958f(1) CO). Qualibroker AG also retains data for the period in which claims can be asserted against Qualibroker AG.

2.6. Data protection guidelines

Qualibroker AG processes data in accordance with the following guiding principles:

- Data processing at Qualibroker AG is based on proportionality. As a result, data is only stored and processed if absolutely necessary for the performance of the task.
- Technically incorrect data from a data supplier is rejected.
- Qualibroker AG processes data only for the fulfilment of a contract and safeguards the security of the data.
- The executive management of Qualibroker AG has overall responsibility for data protection, provides the necessary means to fulfil this responsibility, and is responsible for making appropriate checks to ensure data protection requirements are met.
- All employees of Qualibroker AG understand the importance of data and information, and receive regular training.
- All employees of Qualibroker AG are familiar with the statutory requirements and internal guidelines, and act accordingly.
- All employees of Qualibroker AG are obliged to continuously optimise the effectiveness of data protection activities.
- Confidential and particularly sensitive data is managed securely and protected against unauthorised access.
- Policies and contractual provisions oblige all persons employed or engaged by Qualibroker AG to maintain confidentiality and to comply with data protection requirements.
- Qualibroker AG ensures the responsible handling of data, information, processes and equipment.
- All employees of Qualibroker AG are responsible for creating and maintaining the necessary and appropriate conditions for data protection and data security in their respective function.

2.7. Data privacy management system

Qualibroker AG is certified to ISO 9001:2015 and therefore has the required quality management system. All data processing is documented and can therefore be tracked. Qualibroker AG takes all appropriate and proportionate technical and organisational precautions necessary to protect personal data against unauthorised access, external access, manipulation, modification, falsification, destruction or loss. This applies to all processing stages, from acquisition to destruction of the data.

2.8. Your rights as a data subject

If you can be individually identified from the data stored by Qualibroker AG, you are a data subject. Qualibroker AG processes personal data both as a processor of customer data and as the controller for the processing of partner, employee and supplier data. In the first case, the customer is the controller. The data subject rights listed here need to be conferred by the respective controller.

Right to information:

You have the right to receive information on your personal data processed by the controller and the reason your data is processed. You can make your request for information in writing to the data controller's contact address, enclosing a copy of your ID card or passport.

Right to access and correction:

You have the right to view the personal data concerning you that is processed by the data controller. If, despite our efforts to ensure that data is accurate and up to date, incorrect information is stored about you, we will correct this information on request. You will be informed of the correction when it has been completed.

Right to deletion:

If the applicable laws and regulations do not oblige or entitle the controller to store some of your personal data, you have the right to the deletion of your data from the controller's system.

Right to data portability:

You have the right to receive the personal data concerning you, which you have provided to a controller, and to transmit this data to another controller without hindrance from the controller to which you provided the personal data.

Right to object:

If it is not necessary to process your data in order to fulfil the contract or, according to the applicable laws and regulations, the controller is not obligated or entitled to process your data, you may object to future processing at any time.

Right to make a complaint:

In the event of an infringement of your rights, you have the option to lodge a complaint with the responsible data protection authority.

2.9. Contact

The person responsible for data protection matters and the point of contact for questions is:

Urs Thalmann
Managing director and data protection officer

Qualibroker AG
Baslerstrasse 52
8048 Zurich

Tel. +41 43 311 21 51
Email urs.thalmann@qualibroker.ch

Questions on this subject from the European Economic Area can be directed to the EU representative:

Jan Müller
Managing director and EU representative

Schreiber Maron Sprenger AG
Heiligkreuz 42
FL-9490 Vaduz

Tel. +423 237 57 77
Email j.mueller@schreibermaronsprenger.li

2.10. Right to make changes

Qualibroker AG reserves the right to amend this data protection policy at any time to reflect the latest statutory provisions. The version published at www.qualibroker.ch/datenschutz always applies.