

Vanbreda Privacy Statement

For many years, the companies in the Vanbreda Group have assigned privacy a high priority. We process the personal data of each natural person with care and in a way that takes full account of the relevant legislation, regardless of whether this natural person is a (potential) policyholder, an insured person, injured party, beneficiary, contact person for a company, witness, expert or anything else.

This statement explains why Vanbreda collects personal data, what we do with it and what your rights are. This Vanbreda Privacy Statement is subject to change.

1. What is the Vanbreda Group?

The Vanbreda Group is a network of companies that provide insurance intermediary services and miscellaneous insurance activities, asset management, risk management and claims handling and/or other allied activities. Each company of the group is recognized by the FSMA as an independent broker.

The Vanbreda Group in Belgium consists of:

- Vanbreda Risk & Benefits – FSMA nr. 13718 A-R (0404.055.676) - [contact information](#)
- Vanbreda Ausloos – FSMA nr. 47833 A (0474.182.421) - [contact information](#)
- Vanbreda Calpa – FSMA nr. 103865 (0895.665.732) - [contact information](#)
- Vanbreda Cornelis – FSMA nr. 12565 A (0425.054.196) - [contact information](#)
- Vanbreda Credinco – FSMA nr. 042518 A (0462.175.702) - [contact information](#)
- Vanbreda Dekerf - FSMA nr. 017952 A (0451.680.203) - [contact information](#)
- Vanbreda Geerts – FSMA nr. 044401 A (0466.513.679) - [contact information](#)
- Vanbreda Huysmans – FSMA nr. 067446 A (0478.505.552) - [contact information](#)
- Vanbreda Missinne – FSMA nr. 013584 A (0426.071.906) - [contact information](#)
- Vanbreda Mediüs – FSMA nr. 016788 A (0406.096.042) - [contact information](#)
- Vanbreda Simplex - FSMA nr. 0473.851.334 - [contact information](#)
- Vanbreda Soenen – FSMA nr. 013295 (0405.513.151) - [contact information](#)

Within the group, the company Vanbreda Agencies (0772.859.673) has the status of managing general agent.

In the Netherlands, the Vanbreda Group is represented by [Vanbreda Risk & Benefits Nederland](#), and in Luxembourg by [Vanbreda Risk & Benefits S.A.](#)

The Vanbreda Group has close links to the insurance company [Justitia](#). Justitia specialises in insuring Employee Benefits plans which are developed by the Vanbreda Group and tailored for the policyholding business.

Above you will find all contact and identification details of the various Vanbreda companies.

The data controller for your personal data is the Vanbreda company that collected the data. We refer in this statement to the data controller as “Vanbreda”.

2. Which personal data do we process?

Depending on the situation, we may process the following personal data: your identity data, your contact data, health data, financial data, etc. We process this personal data solely for one of the reasons listed under point 4.

3. Your rights

3.1 You have the right to view your personal data

If you want to know whether Vanbreda processes your personal data, and if so which data, you can ask to view it. Vanbreda will then provide you with the most comprehensive list possible of the personal data being processed in its open files. Given the large volume of personal data processed by Vanbreda, we ask you to specify which information or which processing activities your request relates to. Personal data which only exists in back-up or log files, or which cannot be directly linked to you, will not be included

3.2 You can have your personal data corrected

If it appears that the personal data we are processing about you is incomplete or not (or no longer) correct, you can correct or complete said data (or have this done).

3.3 You can sometimes have your personal data deleted

Your personal data is automatically deleted over the course of time. You will find a more detailed explanation of this in point 6. If you believe that your personal data should not be processed, you can ask Vanbreda to delete said data sooner.

3.4 You can object to certain uses of your personal data

Due to a certain situation in which you find yourself, it may be that you cannot agree to any processing on the basis of Vanbreda's legitimate interests. In this case you can raise an objection to the processing of your personal data and Vanbreda will have to consider the merits of your specific interests as well as its own. Only if there are imperative, legitimate reasons that outweigh your interest (e.g. combating fraud) or in the context of a (future) legal action, will Vanbreda continue to process your personal data.

If you object to the processing of your personal data for direct marketing, Vanbreda will end all processing for this purpose.

3.5 You can oppose certain uses of your personal data

You can ask Vanbreda to restrict the processing of your personal data if, for example, time is needed to check the accuracy of your personal data, where the processing is not legal, if Vanbreda no longer requires this personal data (but you do in the context of a legal action) or if

you have raised an objection to a specific type of processing and the consideration of competing interests still needs to be carried out.

3.6 You can ask for your personal data to be transferred to another party

For personal data that you have provided to Vanbreda, and data that was obtained with your consent or on the basis of a contract and which is being processed by an automated procedure, you can ask that it be transferred to you or someone else.

3.7 You can sometimes reject decisions being taken on the basis of automated processing

In some of our processes, decisions are taken without any human intervention. An example of this is the reimbursement of a claim for which it is clear even to a computer that for the specific situation a reimbursement is obviously the outcome. You are informed of the existence of this kind of automated decision-making, and of the underlying logic used as part of the process itself. You can always get in touch with your contact person at Vanbreda if you have any questions about these automated decision-making processes or if you do not agree with a decision and wish to provide additional information.

3.8 You can withdraw your consent

You can withdraw your consent at any time for the personal data processed by Vanbreda on the basis of your consent. If you withdraw your consent, Vanbreda may no longer be able to provide certain services.

3.9 How can you exercise these rights?

If you wish to exercise one of these rights, it is important for you to:

- formulate your question to Vanbreda clearly (including which information or activity your request relates to, which type of insurance, your customer number, etc.);
- identify yourself (e.g. using the secure online platforms or a copy of your identity card).

Depending on the scope and impact of your request, Vanbreda may ask for additional information.

The best idea is to send your request to your contact at Vanbreda.

For questions or complaints about exercising your rights, you can also address the Vanbreda Data Protection Officer using our form, by e-mail at dpo@vanbreda.be or by post to Vanbreda Risk & Benefits NV, attn. Data Protection Officer, Plantin en Moretuslei 297, 2140 Antwerp, Belgium.

You can find more information about the legislation relating to the protection of personal data at www.dataprotectionauthority.be, the website of the Belgian Data Protection Authority. You can also submit complaints to them.

4. Why are we processing your personal data?

4.1 To meet legal requirements

Vanbreda needs certain personal data in order to meet its legal obligations. If it does not have this data available, it cannot sign or renew any contracts with you, or carry out a transaction that was requested by you or by a third party for your benefit.

Legal provisions that cause Vanbreda to process your personal data include:

- Insurance legislation, in particular the law dated 4 April 2014 and the law dated 2 August 2002 relating to the supervision of the financial sector and financial services
- Anti-money laundering legislation, in particular the law dated 18 September 2017
- Sanctions legislation, in particular the European Regulation No 2580/2001/EC
- Accounting and tax requirements.

4.2 To be able to conclude and implement contracts with you

Some personal data is needed in order to be able to sign a brokerage contract or to provide the service that you expect from Vanbreda when implementing the contract.

Vanbreda's services include, among others, providing advice, offering and recommending insurance contracts, the performance of preparatory work for concluding insurance contracts and the actual conclusion of insurance contracts. Finally, Vanbreda will also help you manage the implementation of insurance contracts. It assists with the preparation of claims and may, if necessary, appoint experts or contact other affected parties and provide them with your personal data.

If you want to make use of a third-party payment system, Vanbreda will also need to process your personal data.

4.3 For the correct provision of our services

Vanbreda will also process your personal data in order to further its legitimate interests.

Processing for this reason includes, among other things:

- Customer management
- Central administration within Vanbreda Risk & Benefits
- General business management, including tracking profitability
- Risk management, combating fraud and compliance
- Legal support and defence of our rights
- Quality control and improvement of our services
- Internal audit

- IT support for other purposes (such as use of pseudo-anonymised data for testing programs, searching for the causes of and solutions for IT problems, etc.)
- Network and information security, including access controls
- Studies and statistics
- Analysis and use of the website, apps, etc. with a view to improving our products and services
- Direct marketing to existing customers (commercial mailings, invitations to events and seminars, sending out surveys, etc.)

For this processing, Vanbreda will always balance its own interests against your rights and reasonable expectations. If you do not agree with one of the above forms of processing, you may lodge an objection as described in point 3.

When you contact the Vanbreda Risk & Benefits Contact Centre with regard to your Hospitalisation, Outpatient Expenses or Income Care policy, your phone call will be recorded to monitor the quality of the service. This data will be stored for up to 180 days.

4.4 For the smooth provision of our services to our clients and insurers

Vanbreda will also process your personal data in order to further the legitimate interests of third parties such as clients, employers and insurers. This will only occur when the interest of the other party outweighs the impact on your rights and reasonable expectations.

Processing for this reason includes, among other things:

- Reporting statistics to clients and employers, for example in order to improve working conditions, provide targeted training, etc.
- Requesting and comparing insurance products
- The provision and membership of insurance policies (such as accident-at-work insurance)
- Wherever possible, this data is communicated to the parties involved on an anonymised basis.

4.5 To carry out direct marketing

Vanbreda wants to offer you products and services that are relevant to you. In addition, we also see it as our job to inform you of new business risks that may, for example, threaten the continuity of your company.

In order to give you the best possible advice, Vanbreda will use the data that it has available. Vanbreda uses your personal data in order to carry out direct marketing. By analysing your personal data, you can enjoy a personalised approach and Vanbreda can present you with specialised proposals. If you would prefer this not to be the case, you can always let us know.

4.6 Because you have provided us with your consent

Certain personal data will only be processed because you have provided Vanbreda with your consent for us to do so. You can remove your consent at any time, without providing any justification.

The withdrawal of consent means that these processes, based on your consent, will no longer be possible in future. The withdrawal of your consent does not mean that processing that occurred in the past on the basis of your consent is suddenly no longer valid.

5. From whom do we receive your personal data?

Your personal data can reach Vanbreda in a number of ways:

1. You may have shared them yourself, initially or in the course of our collaboration;
2. Vanbreda received your personal data from someone close to you (such as your family);
3. Vanbreda received your personal data as part of the implementation of a contract with your employer, where you were an insured person/beneficiary/contact;
4. Vanbreda found said personal data in a public source (e.g. the Belgian Official Gazette, LinkedIn, etc.);
5. Vanbreda purchased said data from third parties, e.g. prospect databases to which you had given your consent;
6. Someone else provided your personal data to Vanbreda as part of the implementation of an insurance contract, or the management of a claim;
7. Someone else provided your personal data to Vanbreda as part of a contract between Vanbreda and said third party (e.g. a hospital invoice that AssurCard passed directly on to Vanbreda);
8. Indirectly (for example from surfing our website).

If you provide Vanbreda with someone else's personal data, it is important that this person is informed about it and referred to this privacy statement.

6. To whom do we provide your personal data?

6.1 Vanbreda

Your personal data can be transferred to other companies within Vanbreda. In this way, each Vanbreda company can see the information relating to customers, and does not need to ask for the same information every time.

This obviously does not apply to your medical data. This is only processed by the company within which it was collected.

Within Vanbreda, only those people who need the information for processing will have access to your personal data. The data they can access will depend on the reason why they need this access.

6.2 Others

Vanbreda may provide your personal data to parties who are involved in implementing a contract or policy. This may be, for example, (potential) insurers, the contact person at a company, (medical) experts and consultants, banks, health insurance funds, etc.

Your medical data is handled with particular care. In order to avoid processing any unnecessary data, we ask everyone to respect the agreements in the insurance policy. In some cases, therefore, you may be asked to send medical information directly to the consulting physician of the insurance company.

If Vanbreda shares this data with a third party (e.g. the insurer or your own doctor), this is only in the context of implementing a contract or paying for a claim.

Vanbreda may also provide your personal data to parties who are involved in handling a claim. These may be, for example, the other party (or their insurers), (medical) experts and consultants, banks, etc.

In order to provide its services as smoothly as possible, Vanbreda uses a number of suppliers and subcontractors. In order to perform their tasks correctly, it may be that they are given access to your personal data. By signing a data processor contract with them, Vanbreda defines some very clear limits about what your personal data may be processed for, and where. In addition, Vanbreda imposes the necessary security standards.

If Vanbreda is legally required to do so, it will share your personal data with the public authorities.

Important: Vanbreda will never sell your personal data.

Vanbreda endeavours to process your personal data within the European Economic Area as far as possible, unless otherwise required to implement a contract (e.g. contact with a local expert for a claim abroad). If this is not the case, Vanbreda will inform you about it.

7. Automated decision-making

Vanbreda uses automated data processing in some processes to increase the speed, reliability and efficiency of its services. In limited cases (see below), there is an automated decision-making process that has consequences for the insured. These processes are subject to manual review on a sample basis. You have the right to ask for human intervention for these processes at any time, indicate your opinion or challenge the automated decision. Please get in touch with your contact person or the Data Protection Officer in this regard.

Process	Logic used	Data used	Importance and expected impact
Hospitalisation report	When you file a declaration that is clearly covered based on limited data, this declaration will	Identification data, insurance policy, declaration data.	Fast acceptance.

	(or may) be accepted automatically.		
Payment of straightforward medical expenses	When you submit medical expenses that are clearly reimbursed based on limited data and limited in amount, these will (or may) be automatically accepted and paid.	Identification data, insurance policy, medical expenses submitted.	Fast payment.

8. How long do we retain your personal data?

Vanbreda will only retain your personal data for as long as Vanbreda needs said data for the implementation of its tasks, and representing its interests.

We will delete your data in our active systems at the latest on the expiry of the liability period for potential complaints.

Your data is stored in our back-up systems until it is removed from the storage system. When a back-up system needs to be used, the data that is no longer needed for the defined tasks is first removed from the active systems.

9. How do we use Google Analytics

Vanbreda uses Google Analytics to collect data about the use of the website and use it to prepare statistics and detailed reports. This information is collected using cookies, in order to optimise the website in line with patterns of user behaviour.

The information that is collected is transmitted directly to Google's servers in the United States. The information is also stored there. To prevent data being traced back to specific users, the users' IP addresses are transmitted to Google and anonymised there before use. These (anonymised) IP addresses will never be processed in conjunction with other data from your users. In this way, data is only collected from anonymous groups and not from individual users.

In addition, Vanbreda does not collect demographic data from its users via Google Analytics, and no additional data is collected for advertising purposes. No user IDs are kept, and no personally identifiable information is displayed anywhere in the website's URLs.

Google acts as the processor for our data, and a processing agreement has been concluded with Google for this role. Google has not been granted permission to use the data on Vanbreda's website for its own purposes, such as displaying advertisements.

The data that Google Analytics collects is therefore anonymous and is only used to help optimise the user experience of the website. The information that we collect:

- Title and URL of the pages a user visits;
- Information about the user's browser, operating system and screen resolution;

- User information: user's language and location based on their browser settings and IP address. This location will be a rough estimate because the IP address will be truncated;
- The platform or website through which the user accesses the Vanbreda website, the amount of time the user spends there, the number of pages they visit, and the date and time of this visit.

Vanbreda's website also uses Google Tag Manager. This Google Inc. tool allows different tags to be placed on the website. Google Tag Manager does not itself use any cookies or collect information from its users.

10. Privacy policy insurance companies

Vanbreda works with various [insurers](#). You can find your insurer's privacy policy on their website.

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Questions and problems relating to privacy

For any questions and problems relating to the processing of your personal data, you can contact our Data Protection Officer (DPO) at dpo@vanbreda.be, using our form or by post to Vanbreda Risk & Benefits NV, attn. DPO, Plantin en Moretuslei 297, 2140 Antwerp, Belgium.