

Privacy statement

We are careful with your personal data

Your privacy is very important to Nationale-Nederlanden, which is why we are careful with your personal data. We take both visible and invisible measures for this reason. This privacy statement provides information about how we handle your personal data.

What is PersonalData?

If you wish to take out a product or file an insurance claim, for instance, we ask you for personal data such as your name and address. If you visit our websites, we may also collect personal data from you as well, such as the IP address of your computer.

Personal data is data that tells something about you or that we can connect with you. We call the collection, retention and use of your data 'processing' your personal data. This term comes from the law. Nationale-Nederlanden complies in the processing of your personal data with legislation and regulations, such as the provisions of the General Data Protection Regulation (GDPR) and the Code of Conduct for the Processing of Personal Data by the Insurance Industry. The section below explains what we process personal data for and what kind of data that can be.

Code of Conduct for the Processing of Personal Data by the Insurance Industry

What do we process personal data for?

We keep and use your personal data for carefully specified purposes only. In most cases, we receive personal data from you yourself, because you have taken out or wish to take out one or more of our products. The law refers to this as processing data that is necessary for preparing or performing a contract. The long and the short of it is that if we are not allowed to keep or use your data, we are unable to help you as a customer.

Your personal data is also used because we maintain centralized customer records, perform marketing activities, seek to prevent and combat fraud or use the data for risk management. The law calls this 'processing for the purposes of legitimate interests'. This may also be in your own interest, so that we can better serve you and can prevent fraud. We also process your data in order to fulfil our statutory obligations. Further information about the basis for our processing of your personal data can be found below.

For performing our contracts

- To review your application for a product.
- To help you as a customer. Therefore, before entering into, managing and/or providing our products and/or before giving advice about our products.
- To provide information to and receive information from other parties, if that is necessary in connection with the provision of your product. Examples are your insurance agent and your mortgage advisers. We inform your adviser, for instance, if you are behind on payments for your product.

On the basis of a legitimate interest

- For centralized customer records
Nationale-Nederlanden maintains centralized customer records. Our customer service uses these customer records to see which of our products you have so that we can provide you with proper and fast assistance. The data that we use within our customer records includes your name, date of birth, address details, other contact details, information about the product or products that you have taken out from us, payment details, marketing data and, in the case of insurance products, claim data.

For marketing, communication and innovation activities

We use your data:

- To better tailor our services to your personal situation. Such as offering you other Nationale-Nederlanden products that fit your requirements.
- For analyses, including data analyses, and for innovations that utilize data analyses, such as the development (and testing) of applications in the area of artificial intelligence (AI). We do this to improve our processes and the product and service offering, and to better tailor it to the needs and wishes of existing and potential customers. We use these analyses for purposes such as creating groups (profiles) of customers with the same characteristics or the same behaviour.
- To keep you informed via our website, app, a letter or email.
- We use tracking pixels to analyze the effectiveness of our e-mail communication and to better tailor it to your interests. These are invisible images that are placed in emails. A tracking pixel allows us to see if an email we have sent you has been opened.
- To give you a personal experience on our websites and apps or to offer advertisements on the websites of others that may interest you. For further information, please see our Cookies Statement.
- Certain marketing activities require your consent. We always seek this consent from you beforehand. If you have given your consent, it is very easy to withdraw it later, for example by clicking the link at the bottom of the email.

To combat fraud

For your own security and that of financial institutions, we process personal data for risk management and to prevent and combat fraud. We may use AI for this purpose. For instance, we use an algorithm for mortgage products with which we calculate the probability of fraud based on a selection of personal data from your application. The results with a high score are assessed by an employee. We may share data within Nationale-Nederlanden, with other financial institutions or with external research agencies for this purpose. In the case of a personal investigation in connection with insurance, we observe the rules in the 'Code of conduct for personal investigations'.

We use a central register of claims to guarantee the security and integrity of the Nationale-Nederlanden companies. Personal data connected with events that could be important and therefore require special attention can be put on this register. We have one register of claims for all our companies and for Movir N.V., our occupational disability insurer. Data from the register of claims is made available by our Security department to all companies falling under Nationale-Nederlanden.

Based on the Protocol Incident Warning system for Financial Institutions (PIFI), Nationale-Nederlanden registers data in the so called Incident register of (natural) persons or legal entities that have led or could lead to affecting Nationale-Nederlanden, our customers or employees or those that could harm the integrity of Nationale-Nederlanden. The registered data in the Incident register can be exchanged with other financial institutions, within the framework of rules dictated by PIFI, for research into fraud amongst other things. Through the External Referral register, attached to our own Incident register, other financial institutions can get a signal and based on this signal they have to look into an application or damage claim.

To improve risk assessment

We process personal data for statistical analysis, to improve risk assessment and to aid in deciding what price to charge for our products. We may use AI for this purpose. For example, we may process data at initiation or throughout the term of a contract in order to manage the risk of potential late payments.

We keep data so that we have access to the right information in the case of a complaint or dispute.

Processing data of third parties

In some cases, we record the data of people other than our customers, such as injured parties, administrators, beneficiaries and people who have furnished security for a customer. We do this only if necessary for performing the contract with the customer.

To fulfil statutory obligations

- For reasons such as your own security, we are required to ask for your personal data in order to establish your identity.
- For the provision of several products, we are required to share your data with the Dutch Tax Authorities. In turn, the Dutch Tax Authorities will report the data of persons who may be designated a Specified US Person to the US tax authorities.
- We may – if we are required to – provide your personal data to authorized parties, such as supervisory authorities, the police, the Public Prosecution Service or intelligence services.

What personal data do we process?

Personal data that we receive from you for performing the contract. We collect the following information:

- General data, such as your name, address, telephone number, email address and date of birth.
- Data for identification purposes.
- Your bank account number so that we can receive your payments and make payments to you.
- Financial data. We will ask you for this in certain cases, such as if you apply for a mortgage.
- Data that we need for a certain product, such as a registration number for car insurance.
- For certain products, such as banking products, life assurance, pension insurance and loss-of-income insurance, we also need your Social Security Number (BSN).
- For the risk assessment for non-life insurance products, we may also enquire whether you have a criminal record.

Medical data

For term insurance or occupational disability insurance, for instance, we also need some medical details from you. We will obtain these details from you, your employer or – with your authorization – a physician. Your medical records are processed on the responsibility of a medical adviser (physician). Medical records are provided by the medical adviser to others within the company only if they need that data to carry out their tasks. In such case, these other persons are subject to the same duty of confidentiality as the medical adviser on the basis of his duty of professional confidentiality.

Additional data

By additional data, we mean extra information that we obtain from public records and other sources, not from you or your adviser. This could mean consulting information for combating terrorism and money-laundering, or consulting the information kept by the Dutch Credit Register (BKR). We do this in some cases to assess a risk or to fulfil our statutory obligations.

Further information about this can be found in ‘From whom do we obtain your personal data?’

Contact history

We make a record of when you have contact with us and what it was about. With a view to improving our operations, including the quality of service, training, coaching and staff evaluation, we record telephone calls and keep a record of the content of chats. In the case of calls about your banking products, we may also keep these recordings as a record of what was discussed or agreed. Using AI, we can automatically convert conversation recordings integrally into text (speech to text) or make a summary of them and perform analyses for the purposes described above. On our website we can also communicate with you via chatbots. When doing so, we make use of a limited form of AI (Natural Language Processing).

Your visits to our websites and apps

We record data about your visits to our websites and apps. Such as what pages you visited, what time you logged in to mijn.nn or what you searched for. This helps us to make the website work better and to give you a personal experience. We also use this data for marketing activities. One way we do that is by placing cookies. Further information about the use of cookies can be found in our Cookies Statement. We also process your IP address. This is the number that identifies your computer, tablet or mobile on the internet for other computers, tablets and mobile phones.

From whom do we obtain your personal data?

We obtain most of the personal data from you yourself or your financial adviser. If you are covered by Nationale-Nederlanden via your employer, for a pension or loss-of-income insurance, for instance, we obtain your data from your employer or sometimes via the Municipal Personal Records Database

(BRP). We may also receive data from other banks and insurers if necessary for performing a contract. We receive information about your health from your employer (reporting sick), physician (with your consent) or the UWV benefits agency.

When reviewing an application for a banking or non-life insurance product or handing a claim, we also consult different sources such as the Central Register (CIS), Dutch Mortgage Guarantee scheme (NHG), Dutch Credit Register (BKR), the Chamber of Commerce and fraud registers. For non-life insurance, we also use FRISS, which uses various public records and other sources, such as credit reference agencies. This helps us to assess the risk of fraud, default and claims and evaluate whether the application meets the acceptance rules.

If you are a customer of authorized agent Nationale-Nederlanden Verzekeren Services B.V., Nationale-Nederlanden Schadeverzekering Maatschappij N.V. will receive your personal data as well. If you are a customer of another party that takes out products on our behalf (an authorized agent), we will receive your personal data in order to fulfil our statutory obligations.

We use public records and data from market research agencies to validate and improve our data and to gain even better insight into our customers and services. We process personal data that we receive from third parties if it may be provided by that party and we do not use this personal data for purposes other than for which it was obtained.

With whom may we share your personal data?

We may provide your personal data to the persons, companies and institutions named below. We do that only if:

- it is necessary for performing the contract;
- we have a 'legitimate interest' in it, and the provision of your data is necessary for this reason. This is explained in 'What do we process personal data for';
- it is required by law to provide your data;
- you have given permission.

Only if we have at least one of the reasons mentioned above will we provide your data to one or more of the parties below.

- NN Group N.V., as far as necessary for operations and for fulfilling statutory obligations
- Sparklab B.V. (trade names NN Sparklab and Nationale-Nederlanden Sparklab) and NN Zakelijke Diensten B.V. to provide offers by e-mail or other digital channels.
- Companies to whom we outsource activities ('processors'). These companies then work under our authority.
- Your adviser or representative, your employer and its adviser if you are covered via your employer.
- Medical advisers and vocational experts.
- Companies that we work with for settling claims by providing expertise or recovery or advisory activities for non-life and loss-of-income insurance.
- Companies that we work with for reviewing applications for a product or an insurance claim.
- Public services, such as supervisory authorities, the police and judicial authorities and to the Tax Authorities, if we are required by law to do so.
- Other banks and insurance companies. This includes reinsurers and legal expenses insurers.
- Bailiffs, debt-collection agencies and/or civil-law notaries and credit reference agencies (such as EDR Credit Services).
- External registers such as CIS, BKR, NHG, Dutch External Reference Register (EVR).
- The UWV benefits agency.

Automated decision-making

For several products, such as motor insurance or term insurance, we evaluate the application via an automated process. We may also use AI for this purpose. In this process, we review whether you meet our acceptance criteria. This includes verifying whether the information that you provided in the application about yourself or what you want to insure is correct.

We also test this against several fraud indicators and use your data and data from public records and other sources as the basis for a risk assessment. This review can affect the amount of your premium for insurance products or the interest for banking products. If there is a record of fraud, one of our employees will always review your application. You have the right to have a decision referred to a

member of staff and to receive an explanation, to let them know what you think of it and to object if necessary.

How we take care of your personal data

We ensure proper security

We spend a lot of time and effort on the security of our systems and the personal data stored within them. Each business unit also has a special team that monitors security and the use of personal data. We keep a constant watch over the security of our data traffic. We take immediate action, should something ever go wrong. We resolve and register data breaches. That is also our legal duty. We also report them to the supervisory authority and to you, if necessary.

There are checks on how we process your personal data

- The Dutch Data Protection Authority (AP) checks whether we comply with the GDPR.
- The Dutch Authority for Consumers & Markets (ACM) monitors our use of cookies, direct marketing via email and telemarketing.
- The Dutch central bank (DNB), European Central Bank (ECB) and Dutch Authority for the Financial Markets (AFM) monitor the financial sector in general and, therefore, also Nationale-Nederlanden.
- Internally, the Data Protection Officer monitors how we handle your personal data. The Data Protection Officer for life assurance and pension products can be reached via DPO-leven@nn.nl. The Data Protection Officer for non-life and loss-of-income products can be reached via fg-schade@nn.nl and for banking products via fg-bank@nn.nl.

We have signed a non-disclosure agreement

All our employees have signed a non-disclosure agreement and taken an oath. We are careful with the data that you have entrusted to us. Solely authorized staff may have access to and process your data.

What are your rights?

As a customer, you have several rights concerning your personal data. These rights are explained below.

You have the Right of access

This means that you may request which personal data we have registered about you and what we use it for.

You have the Right to rectification, erasure and restriction

You are entitled to have your personal data changed if it is not correct. You are also entitled to have your personal data deleted if your personal data is unlawfully processed, no longer necessary for the purpose for which it is processed, or because you have withdrawn your consent and NN no longer has any other legal grounds for processing your data. You are also entitled to restrict your personal data. This right means that you may tell us temporarily not to use your data. You may exercise this right if your personal data is incorrect, unlawfully processed, no longer necessary for the purpose for which it has been collected or processed, or if you object to the processing of your data and your objection is still being handled by us.

You have the Right to data portability

This means that you are entitled in certain cases to request us to take the personal data that you provided, and transmit it to you and another service provider.

You have the Right to object

You may lodge an objection to the processing of your personal data, if we use your personal data for purposes other than necessary for performing a contract or necessary for fulfilling a statutory obligation. We will carefully assess your objection and stop processing your personal details, if necessary.

Setting your preference for offers

You can easily change your preference for receiving offers via email at all times. Simply click the link at the bottom of the email or call us to let us know.

How long do we keep your data?

We keep your data as long as we are required by law to do so and as long as necessary for the purpose for which we use the data. This may vary by product. This is based on the following rules:

Do you have a term insurance, life assurance or pension insurance policy?

We keep your data as long as you are a customer of ours. This also continues for some time if you no longer have a certain product of ours. In that case, we apply the statutory retention period of seven years. After that, we keep the data for statistical purposes only and with a view to handling complaints and legal actions. In that case, we keep the data in a closed file.

Do you have non-life or loss-of-income insurance, such as motor insurance, homeowner's insurance or occupational disability insurance?

We keep your data as long as you are a customer of ours. This also applies if you are not a customer, but that we process your personal data to settle a claim, for example. We remove the policy details seven years after termination of the contract. We remove the claim details seven years after termination of the claim. In the case of personal injury, we keep the data for twenty years after the claim is settled. After the retention period, we keep solely the data necessary for statistical purposes.

Do you have a mortgage loan, consumer loan, bank saving or savings product or investment product?

We keep your data as long as you are a customer of ours. We remove your data, in principle, seven years after the termination of your contract.

Do you have a health insurance policy?

We have placed your health insurance with health insurer Centrale Ziektekostenverzekeringen NZV N.V., part of CZ Group. We keep your data as long as you are covered via us. We remove your data, in principle, seven years after the termination of your contract. If you would like to know what data CZ has about you, please contact CZ via cz.nl/privacy

Where do we process your data?

Your data is generally processed within the European Union (EU). Personal data is processed outside the EU in some cases. Some of our suppliers and business partners are also located outside the EU or provide these services outside the EU. The regulations in those countries do not always provide the same level of personal data protection as European regulations. To ensure that your personal data is safe nevertheless, we take measures in such cases by entering into contracts ourselves where we make similar arrangements about the security of personal data, just like we do within the EU. We call these EU model contracts.

To which companies does this privacy statement apply?

You probably know us only as Nationale-Nederlanden, because we trade under this brand name. This includes the following companies. These companies are all part of NN Group N.V. This privacy statement applies to the companies below. These companies work together and share data with each other and with NN Group N.V. as well as Sparklab B.V. (trade names NN Sparklab and Nationale-Nederlanden Sparklab) and NN Zakelijke Diensten B.V. As a customer of ours, you may receive offers from these companies.

- Nationale-Nederlanden Levensverzekering Maatschappij N.V.
- Nationale-Nederlanden Schadeverzekering Maatschappij N.V.*
- Nationale-Nederlanden Bank N.V.
- Distributie Zorgverzekeringen B.V. (trade name Nationale-Nederlanden Zorg)
- Volmachtkantoor Nederland B.V.
- Bemiddelingskantoor Nederland B.V.

Questions

If you have any general questions about your personal data, please contact our customer service. Our telephone numbers can be found here.

How to gain access to or change your personal data

Please visit mijn.nn, your personal online environment where you can gain access to and change your primary personal data, such as your residential address or email address. Via mijn.nn, you can also retrieve Privacy statement / Nationale-Nederlanden

further details and exercise your other rights, such as the right to data portability. Not yet registered with mijn.nn? To create an account, please go to [nn.nl/account](https://www.nn.nl/account) or contact our customer service.

Are you a customer via ING Verzekeren?

Do you have an insurance via ING Verzekeren? And do you have questions about your personal data or when you would like to exercise your rights as a customer? Please contact ING Verzekeren (part of Nationale-Nederlanden) via +31 (0)20 22 888 88, on weekdays from 8.30 a.m. to 7 p.m. and on Saturdays from 10 a.m. to 4 p.m. Do you have questions on your personal data or do you want to exercise your rights as a customer of ING Bank? Please go to [ing.nl/privacy](https://www.ing.nl/privacy).

Are you a customer via SNS Verzekeren?

If you have an SNS insurance product and have questions about your personal data or would like to exercise your rights as a customer, please go to <https://www.snsbank.nl/particulier/service/privacy-amp-cookies.html>. You can also contact SNS on +31 (0)30 633 30 00, on weekdays from 8 a.m. to 9 p.m. and on Saturdays from 9 a.m. to 5 p.m. If you have questions for Volmachtkantoor Nederland B.V., please send your message to info.vkn@nn.nl.

Any questions about your health insurance?

We have placed your health insurance with Centrale Zorgverzekeringen NZV N.V., and O.W.M. CZ Groep U.A., both part of CZ Groep. Nationale-Nederlanden Zorg holds only that data which is necessary for acting as your intermediary and providing services. For example your name, address and age. For further information, our telephone number is +31 (0)26 353 53 53. We have no access to your medical or payment details. If you would like to know what data CZ Groep has about you, please contact CZ. See [cz.nl/privacy](https://www.cz.nl/privacy).

Complaints

If you have a complaint about how Nationale-Nederlanden handles your personal data, this can be lodged via <https://www.nn.nl/Contact/Klacht-melden.htm>. You can also file a complaint with the Dutch Data Protection Authority.

If you have filed a complaint with us and are you dissatisfied with our response, please contact the Financial Services Complaints Institute (Kifid), Postbus 93257, 2509 AG, Den Haag. You can also call them on +(0)70 333 89 99 or get in touch via www.kifid.nl.

About this privacy statement

This privacy statement can be adjusted to changes in the law or in legislation and/or when we change the way we process personal data. This version is dated 1 december 2022. The most recent version is always available on [nn.nl/privacy-statement](https://www.nn.nl/privacy-statement).