



Dazure.

Verzekeringen vanuit het hart

Privacy statement Dazure

#carefully handling your data

Who are we?

Dazure is an authorized agent. We offer insurance products that we develop ourselves, including under the labels *GoedIdee* and *GewoonIdee*. We do this with the "family benchmark" in mind—in other words, would you do the same for your brother, sister, or parents?

In the same way, we process personal data in accordance with the General Data Protection Regulation (GDPR), the Dutch GDPR Implementation Act, relevant codes of conduct—including the Code of Conduct for Personal Data Processing—and the protocols of the Dutch Association of Insurers, as well as other applicable laws and regulations. It may sound like a lot, but in essence, it means that we fully comply with all these guidelines 😊.

Why this statement?

We want to be as clear as possible about the data we process from you.

In this Privacy Statement, you will read about which data we process from you and for what purpose. The data you provide will be treated confidentially. Below, we describe how we handle your data and what we mean by personal data.

We will update this Privacy Statement if there are any changes. This version was made on 20 February 2025. Changes: addition of article on AI.

If you have any questions after reading this document, please contact us at:

Dazure B.V.

Contact: Patricia Boer (Compliance & Proces manager)

E-mail: compliance@dazure.nl

Your personal data at Dazure

What is personal data and what is meant by processing personal data?

Personal data is data that directly or indirectly says something about you. For example, your name and address but also your income or your postal code.

'Processing' of personal data includes everything that can be done with personal data, such as collecting, using, consulting, and storing your data. But this also includes deleting your data from our records.

Personal data of whom?

We process personal data of people with whom we have, want to have, or have had a relationship. This includes the data of:

- Candidate insured persons
- Candidate policyholders
- Policyholders
- Insured persons
- Premium payers
- Advisors
- Beneficiaries

What personal data do we process?

Below you'll find an overview of the types of personal data we may process and for what purposes we use them:

- Data about your identity (such as age and gender);
- Contact details (such as name, address, place of residence, telephone number, and email address) and contact history;
- Financial information such as income as well as payment statuses;
- Data about employment, income, profession, and employer;
- Data necessary for fraud prevention;
- Special personal data (such as data about your criminal and/or medical history);
- Reactions on social media;
- Data about you from other parties: we may use data from other parties who have obtained your consent to share your data.

For what purposes are your data processed?

If you apply for an insurance with us, we ask for your personal data and that of the (co-)insured. These may be used by us, the insurer, and your advisor to:

1. Process the insurance application or changes to your insurance;
We need the data to assess and process your insurance application, contact you, or send a confirmation via email. In most cases, we will receive your data from the advisor.
2. Maintain and/or expand the relationship with you;
We need the data to manage your insurances with Dazure, answer your questions, manage your other data, and process any necessary changes. If you fill out a contact form on our website, we use your personal data to respond to you.

3. Enter into an agreement with you;
We process your personal data to enter into and execute an agreement.
4. Conduct statistical research;
We may use your data to personalize our services and conduct statistical research. We do this by anonymizing and aggregating your data. So, we remove the personal data we don't need for this purpose.
5. Comply with the law;
 - a. *Identification and verification obligation: if you take out insurance with us, we may need to verify your data further. For client screening, we then verify your identity. We do this by requesting a copy of your ID. Note: you may make your photo and BSN unreadable on this copy.*
 - b. *Information obligation and reporting: for the GoedIdee insurance, we process your BSN to comply with the reporting obligation imposed by the Tax Authorities. We are legally obliged to pass on this information. It may also be necessary for us to pass on your data to the AFM (Financial Markets Authority), DNB (De Nederlandsche Bank), or the AP (Personal Data Authority).*
6. Ensure the financial sector remains safe and sound.
7. Conducting marketing activities;
Sending newsletters or information of specific nature.
8. Preventing and combating fraud.
Digital investigation into your personal data may be part of the procedure for entering into or executing the insurance agreement.
For fraud prevention and detection, we use and participate in the Incident Registers and warning systems of the financial sector. The purpose of this is to protect customers of financial institutions and financial institutions themselves.

Legal grounds for processing data

We use at least one of the following grounds for processing your personal data:

- Executing a contract for a financial product or financial service;
- Being able to comply with a legal obligation resting on us;
- The explicit consent you have given to process data for specific purposes;
- For the pursuit of our legitimate interests in the context of our business operations or those of a third party.

With whom do we share your data and why?

We do not simply provide your personal data to others. We may do so if you have given us permission to do so, if we are required to do so by law or by a court decision, or if such provision serves the purposes of processing personal data. Dazure may also pass on your personal data to other parties performing tasks for us. For example, think of the system's automation provider that we use for insurance administration. We have made extensive and thorough agreements with these parties about processing your data. For example, regarding confidentiality and security. These agreements are recorded in a contract.

We only engage these parties if it fits the purpose for which we use your personal data. These parties include, among others:

- Financial institutions (such as insurers/banks);
- Intermediary;
- Individuals and entities that must be informed on the basis of a legal obligation;
- External parties processing data on, among other things, authority and responsibility, such as our automation provider or a medical practitioner;
- Databases focused on fraud prevention such as CIS;
- External partners we engage for providing support services we have agreed upon with you;
- Accountants.

How long do we retain your personal data?

We do not retain your personal data longer than necessary. Data that we necessarily need will be kept for at least the duration of the relationship or agreement. If our relationship or agreement ends, we will retain the data for the retention period determined prior to the relationship or agreement. We maintain a basic retention period of 7 years. The data of individuals who have applied for a product or service but have not become customers will be kept for 6 months. Exceptions to the above-mentioned periods may apply if, for example, the law prescribes a shorter or longer period.

In case of questions or disputes or when an investigation is conducted in a file, the retention period may be suspended as long as it is under review.

Security, confidentiality, and supervision

Dazure takes appropriate security measures to prevent misuse of and unauthorized access to your personal data. We ensure you that only necessary persons have access to the data, that access to the data is shielded, and that our security measures are regularly checked.

Rights regarding the processing of your personal data

You have specific rights regarding the processing of your personal data. You can always contact us about this.

Right to access, rectification, and supplementation

If you want to know which personal data we process about you, you can use the right of access. If you want us to adjust your data, you can use the right of rectification. We like to keep your data up to date. It is important for both you and us that the collected data is correct. The request for access or rectification can be addressed to servicedesk@dazure.nl. Within 4 weeks, you will receive a message whether this request can be fulfilled.

Right to object and right to erasure:

Personal data may be used by Dazure to inform you specifically about insurance products (services) that may be relevant to you. If you do not wish to receive this information, you can email servicedesk@dazure.nl. We will then make sure that we no longer contact you. If you want your data to be erased or if you want to object to its use, you can also email the Service Desk.

Right to erasure/forgetfulness

Do you want your data to be deleted from the Dazure system? In most cases, this is possible, except if you have an insurance policy that you wish to maintain. We need your personal data for the execution of the insurance. You can send us a request to delete your data via servicedesk@dazure.nl. We will then contact you and let you know if we can fulfill your request.

Right to data portability

You have the right to transfer your personal data to yourself or to another organization upon your request.

Use of CIS

In connection with a responsible acceptance, risk, and fraud policy, we are required to consult and record your data at the Central Information System Foundation (CIS) in The Hague. The objective of processing personal data at the CIS Foundation is for insurers to manage risks and combat fraud. Would you like to know more about the CIS Foundation and how they handle personal data? Please visit their website, www.stichtingcis.nl/en-us/

Use of AI in Medical Underwriting

For medical underwriting, we use Responsive Artificial Intelligence (RAI). This technology helps assess insurance applications by making predictions based on previous, anonymized data. Responsive means that the AI tool continuously learns and is regularly monitored for fairness, transparency, and reliability.

When you apply for insurance, you fill out a health declaration with medical information. Our AI tool analyzes this information and compares it with previous, anonymized applications to make an assessment. However, a medical underwriter always reviews the AI's recommendation and makes the final decision. This means that the AI does not make automatic decisions. The AI does not have access to personal details such as your name, contact information, or policy number and therefore cannot identify you.

We use RAI because it enhances speed and accuracy, while also ensuring fairness and transparency. The system continuously improves and is closely monitored to prevent any biases in the assessment process. This helps make decisions fairer and more understandable.

By using AI, we can improve customer service with faster responses, reducing processing time for you as a customer. Additionally, we aim to reduce pressure on the healthcare system by streamlining medical underwriting, minimizing the need for doctors and medical specialists to perform assessments. However, a medical underwriter always makes the final decision and can override the AI's recommendation.

We comply with data protection laws (GDPR) and ensure human oversight (GDPR Article 22). We implement strict security measures to protect your data by encrypting and processing it in a secure environment. Only authorized employees have access to this environment. We also conduct regular audits to ensure that the AI tool continues to operate fairly and transparently.

Ethical Standards in AI

When developing our AI model, we followed the Ethical Framework of the Dutch Association of Insurers. This framework includes key principles such as: human control over decisions, not computers; strong privacy protection for customers; AI must not harm or discriminate against anyone.

We also apply our Family Benchmark to the use of AI: Would we offer this product or way of working to our own family?

Do you have questions about AI at Dazure? Feel free to contact us at compliance@dazure.nl.

Use of our website

We have taken appropriate measures to secure your visit to and use of our site and to prevent abuse. All persons who can access the data are bound to confidentiality. When you visit our website to obtain information, visitor data may be collected and stored by us to promote the user-friendliness of the website. It is possible that small text files (cookies) may be sent to your computer to facilitate communication via the electronic communication network.

Dazure uses Google Analytics cookies; however, these are only used to monitor from which devices the health declaration is completed. We do this to gain better insight into the functioning of our website and documentation.

- We have entered into a Data Processing Agreement with Google;
- The last octet of your IP address is masked;
- No data about you is shared by Google;
- And no other Google services are used in conjunction with the Google Analytics cookies.

Dazure strives for the most careful and up-to-date display of data on our site. We also aim for good accessibility of the website and the services offered by us electronically. However, inaccuracies and incompleteness may occur. We reserve the right to change the content of the information on this website.

Right to lodge a complaint

If you disagree with the way we process your personal data or handle your rights as a customer, please contact us via Patricia Boer, via compliance@dazure.nl or by calling 076-5310758.

You can also file a complaint with the Dutch Data Protection Authority. For this, please visit: <https://www.autoriteitpersoonsgegevens.nl/en>

New developments:

The text of this disclaimer may be adjusted by us in view of new developments, for example, in the context of our business activities. It is therefore advisable to consult this text regularly on our website.

Questions:

If you have any questions about this disclaimer (privacy statement), please contact:

Dazure B.V.

compliance@dazure.nl

Phone number 076 531 0758

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