

## Albatros data privacy policy

### Correspondence address:

Albatros Versicherungsdienste GmbH  
Albatros Service Center GmbH  
ServiceCenter, Postfach 3253, D-53832 Troisdorf

**Customer:**

**Customer number:**

**Address:**

## Albatros data privacy policy

We, Albatros Versicherungsdienste GmbH and Albatros Service Center GmbH (hereinafter referred to in each case as "Albatros" – or "We"), as a company in the Delvag group and the Lufthansa group of companies, take the privacy of your data very seriously. The following information provides an overview of how we process your data and your rights under the relevant data protection regulations:

### Art. 1 Responsible party

You request brokerage and/or management services of your contracts with insurers, building societies and/or investment companies and/or other companies – with which We, Albatros Versicherungsdienste GmbH and Albatros Service Center GmbH respectively, collaborate – on the basis of an existing contractual relationship (hereinafter also referred to as the Contract) with

#### Albatros Versicherungsdienste GmbH

Address: Venloer Str. 151-153, D-50672 Köln, Germany  
Tel.: +49 (0)221 8292-002  
Fax: +49 (0)221 8292-246  
E-mail: [zentrale@albatros.de](mailto:zentrale@albatros.de)

for brokerage services and the management of policies with insurers, **and/or**

#### Albatros Service Center GmbH

Address: Venloer Str.151-153, D-50672 Köln, Germany  
Tel.: +49 (0)69 696-9977  
Fax: +49 (0)69 696-9978  
E-mail: [service@albatros.de](mailto:service@albatros.de)

for brokerage services and the management of policies with building societies and/or investment companies and/or other companies.

### Queries regarding data privacy:

For any queries regarding data privacy, please get in touch with us using the contact details provided above or send us an e-mail at [datenschutz@delvag.de](mailto:datenschutz@delvag.de). Please also feel free to address your query to our Lufthansa Group Privacy Officer:

#### \*Lufthansa Konzerndatenschutz-Beauftragte (Group Privacy Officer)

Deutsche Lufthansa AG  
Konzerndatenschutz-Beauftragte  
Lufthansa Aviation Center  
Airportring  
D-60546 Frankfurt/Main  
Germany  
E-mail: [datenschutz@dlh.de](mailto:datenschutz@dlh.de)

### Art. 2 Purpose and legal basis for collecting, processing or utilizing data

The main purpose of processing your data is to provide advisory and brokerage services related to insurance policies, pension contracts, financial investment contracts, loan contracts and general financial services. In some cases, for instance brokerage services for occupational disability insurance, the processing of special categories of personal data (for instance, health-related data) is necessary.

**NB:** Please note that it is not possible to finalize and subsequently execute any of the above policies without processing your data.

We process your data solely for the purpose described above and for fulfilling our duties and obligations resulting from such transactions. The processing of your personal data shall be lawful where processing is necessary for the performance of a contract to which you, the data subject, are party pursuant to Art. 6 (1)/1/lit. b) of the General Data Protection Regulation (GDPR), where processing is necessary for compliance with a legal obligation to which We, the data controllers, are subject pursuant to Art. 6 (1)/1/lit. c) of the GDPR, and where the data subject has given consent to the processing of his or her personal data pursuant to Art. 6 (1)/1/lit. a) of the GDPR. The processing of special categories of personal data is solely based on the data subject's consent pursuant to Art. 9 (2)/lit. a) of the GDPR. In addition, pursuant to Art. 6 (1)/1/lit. f) of the GDPR, processing your data may be necessary for purposes of the legitimate interests pursued by the data controller or by a third party, for instance in matters pertaining to legal succession.

Finally, some of your data may be subject to automated processing with the aim of assessing specific personal aspects (profiling). Profiling is used, for instance, in the following cases: due to legal and regulatory requirements, We are obliged to carry out a target market comparison in various product areas, in particular for investment and insurance investment products, in order to check whether the product is suitable or appropriate for you. In this context too, processing is carried out for purposes of data analysis, for instance: to analyse your knowledge and experience of investment products, your financial situation, your loss-bearing capacity, your investment objectives and risk tolerance. This information is automatically compared with the corresponding product specifications. These measures support us in the provision of our investment advisory and brokerage services and also serve to protect your interests at the same time.

The need for and the scope of data processing depend on the advisory and brokerage services you have requested. Your consent to the processing of your personal data by service providers commissioned by us is required, unless said service providers act as contract processors as specified under Art. 28 of the GDPR.

### **Art. 3 Recipients or categories of recipients who may be notified of your data**

- (1) Albatros transfers your data to the following categories of recipients wherever this is necessary for brokerage or management services of the product you have requested:
  - insurers authorized by the German Federal Financial Supervisory Authority (*BaFin*) with a branch establishment in the Federal Republic of Germany;
  - financial/credit institutions authorized by *BaFin* and operating a branch establishment in Germany;
  - building societies;
  - sub-intermediaries, including cooperation brokers;
  - providers of units or shares in domestic open-ended investment funds, EU open-ended investment funds or open-ended investment funds that may be marketed under the German Investment Code (*KAGB*);
  - providers of units or shares in domestic closed-end investment funds, EU closed-end investment funds or foreign closed-end investment funds that may be marketed in accordance with the *KAGB*;
  - investment providers as specified under Section 1 (2) of the German Asset Investment Act (*VermAnlG*);
  - insurance ombudsmen;
  - social security and insurance organizations;
  - ad-hoc advisers;
  - the German Federal Financial Supervisory Authority *BaFin*;
  - external contract processors (service providers pursuant to Art. 28 of the GDPR).
- (2) In addition, Albatros transfers your data to broker pools wherever this is necessary for brokerage or management services of the product you have requested. Albatros is currently cooperating with the broker pool Jung, DMS & Cie. POOL GmbH, Kormoranweg 1, D-65201 Wiesbaden, Germany. Any changes and developments will be updated on our website at [www.albatros.de/web/albatros/maklerpool](http://www.albatros.de/web/albatros/maklerpool) (in German). Further information on the subject of broker pools is also available on our website (in German).
- (3) Your data are only transferred by us to the extent necessary for purposes of processing as specified above.
- (4) No data are transferred to recipients located in third countries or any international organizations.

### **NB: Identification in compliance with the German Money Laundering Act (*GWG*)**

Under the *GWG*, Albatros, as a provider of life insurance, accident insurance with premium refund or loans as specified under Section 1 (1)/2/2 of the German Banking Act (*KWG*), is obliged and authorized to confirm a product partner's identity – and where required, the identity of persons acting on the latter's behalf and any economic beneficiaries – on the basis of the necessary identification documents that are to be submitted prior to the finalization of a contract and to forward a copy of said identification documents to the relevant insurer and/or bank.

### **Art. 4 Rights of the contracting party**

For purposes of providing the product you have requested, it is necessary to transfer the policy-relevant information and data to the potential product partner (for instance, an insurer). The rights of such potential product partners to store and use your data within the scope of the contractual purpose, and/or to forward said data to reinsurers or co-insurers are based on the product partner's relevant data protection provisions and/or based on statutory and regulatory provisions.

#### **Art. 5 Duration of data storage**

- (1) Albatros is entitled to store your data for the duration of the policy.
- (2) Albatros is also entitled to store your data beyond the end of the policy for as long as you may assert claims against Albatros under the contractual relationship. In individual cases, this can be for a period of up to 30 years following the termination of the policy. Upon expiry of the relevant period, Albatros shall delete your data provided that no further legal, official or contractual storage obligations exist.

#### **Art. 6 Rights of the customer**

You have the following statutory rights:

- right of access by the data subject, in accordance with Art. 15 of the GDPR
- right to rectification, in accordance with Art. 16 of the GDPR
- right to erasure ("right to be forgotten"), in accordance with Art. 17 of the GDPR
- right to restriction of processing, in accordance with Art. 18 of the GDPR
- right to data portability, in accordance with Art. 20 of the GDPR
- right to object, in accordance with Art. 21 of the GDPR
- right to withdraw consent, in accordance with Art. 13 (2), lit. c) of the GDPR
- right not to be subject to a decision based (...) on automated processing, in accordance with Art. 22 of the GDPR

#### **Art. 7 Right to lodge a complaint**

You have the right to lodge a complaint with the relevant supervisory authorities. You are free in your choice of supervisory authority and are not bound by any criteria. The competent supervisory authorities for our purposes are:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen  
(North Rhine-Westphalia Commissioner for Data Protection and Freedom of Information)  
Kavalleriestr. 2-4, D-40213 Düsseldorf, Germany

T: +49 (0)211/38424-0  
F: +49 (0)211/38424-10  
E: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

Bundesbeauftragte für den Datenschutz und die Informationsfreiheit  
(Federal Commissioner for Data Protection and Freedom of Information)  
Husarenstr. 30, D-53117 Bonn, Germany

T: +49 (0)228 997799-0  
F: +49 (0)228 997799-5550  
E: [poststelle@bfdi.bund.de](mailto:poststelle@bfdi.bund.de)

#### **Art. 8 Data sources**

In general, we collect your data directly from you. In addition, we receive – depending on each individual case – data from the recipients and categories of recipients specified in Art. 3 and from publicly accessible sources. It is also possible that Albatros may obtain your data from third parties (for instance, from other Albatros customers).

**NB:** Please note that we cannot provide suitable advice and brokerage services to represent your interests without obtaining the necessary data from you.

#### **Art. 9 Current version**

The current version of our data privacy policy is available on our [website](#).

## Declaration of consent

### **A. Your communication with Albatros**

By signing this document, **I hereby expressly agree** to the sending of unencrypted emails for purposes of executing the contract. I also expressly grant this consent for email messages that contain special personal data. This authorization for unencrypted communication shall remain in effect until revoked by me in future.

- Yes.
- No, I would like to receive the policy documents by post.

**I expressly agree** that Albatros may inform me – in addition to the policies brokered and managed by Albatros – about insurance and/or financial investment products, for instance about the finalization of new insurance policies and/or about changes to the content of existing policies, in particular pertaining to the renewal, expansion and/or amendments thereof. Apart from the regular correspondence by post, Albatros may also inform me

by e-mail: \_\_\_\_\_

by phone: \_\_\_\_\_

by other means of communication: \_\_\_\_\_

*(Please tick or add as appropriate; provision of this information is voluntary.)*

**NB:** You may withdraw this consent, in whole or in part, at any time (by post, email or fax) without stating reasons. In accordance with Art. 7 (3) of the GDPR, the withdrawal of consent shall not affect the lawfulness of processing (for instance, for promotional or advertising measures) based on your consent before its withdrawal.

\_\_\_\_\_  
**City, date**

\_\_\_\_\_  
**Signature of customer**

## **B. Declaration of consent for purposes of data processing**

**I expressly agree** that my personal data, including any special categories of personal data as specified under Art. 9 (1) of the GDPR (for instance, health-related data when applying for life, health or accident insurance [personal insurance]), to the extent that such data are necessary in the context of policy procurement and/or execution, and for the performance of procurement or other advisory and brokerage activities pertaining to financial services, may be processed by Albatros.

In connection with requests for coverage, finalizing policies and the implementation/processing of insurance policies and other financial services requested by me, **I also agree** that Albatros may transfer/receive my personal data to/from the relevant product partner(s) and to/from the third parties listed below. Where necessary, such third parties may likewise process any personal data obtained – and in particular also process such data for purposes of profiling – and transfer said personal data to the relevant product partners and to Albatros. Such data transfer does not constitute a change of the intended purpose.

### **Third parties in the context of this declaration are:**

JDC Pool GmbH, Kormoranweg 1, D-65201 Wiesbaden, Germany

In addition, I **authorize** the relevant product partners to transfer data directly to the listed third parties and to the recipients or categories of recipients specified in Art. 3.

You can visit [www.albatros.de](http://www.albatros.de) at any time to find out about any changes with regard to third parties or the categories of recipients after the submission of your declaration of consent.

**NB:** Please let us know if you wish to receive separate notifications about any changes with regard to said third parties. Your declarations of consent shall apply, notwithstanding the materialization of the proposed policy, also for the relevant vetting procedures for insurance policy applications submitted to other service providers, or for future applications and requests.

**NB:** You may withdraw this consent, in whole or in part, at any time without stating reasons. In compliance with Art. 7 (3) of the GDPR, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Please note that your withdrawal of consent may imply that the relevant policy, in whole or in part, cannot be executed or can no longer be executed in accordance with the contractual terms and conditions of the policy.

\_\_\_\_\_  
**City, date**

\_\_\_\_\_  
**Signature of customer**