

## Ecclesia Credit GmbH

### Customer Information at First Business Contact

The Ecclesia Group, in collaboration with its broker companies, is one of Germany's foremost providers of insurance advisory, risk consulting, procurement, and management of insurance contracts. With its modern, industry-leading services, the Ecclesia Group creates value for its clients. This customer-centric focus fuels constant innovation. It also propels the further development of products and services within the group.

### Mandatory information required under Article 15 of the German Regulation on Insurance Mediation (VersVermV)

#### Status

Insurance broker with a license in accordance with Sec. 34d Para. 1 of the German Trade, Commerce and Industry Regulation Act (Gewerbeordnung), registered with the IHK Lippe zu Detmold, registration number D-7R2M-CLSU0-74. This information can be verified with the Association of German Chambers of Industry and Commerce (DIHK), Breite Strasse 29, 10178 Berlin, phone +49 180 6005850 (0.20 €/call), [www.vermittlerregister.info](http://www.vermittlerregister.info).

Ecclesia Credit GmbH renders consulting services on insurance products offered. The company provides these offerings in accordance with the law. Ecclesia Credit GmbH usually receives a broker's commission for its activities, which is included in the insurance premium. In the case of a corresponding agreement, the company's services are rendered on the basis of a fee, which is to be paid directly by the client; a combination of a broker's commission and a fee is also possible. Apart from the broker's commissions and fees, the company may earn interest income from its collection activities. In addition to the aforementioned forms of remuneration, Ecclesia Credit GmbH may receive separate remunerations from insurance companies for services rendered to such insurance companies. Ecclesia Credit GmbH is not compensated in any other way. In the case of insurance contracts that are mediated and/or managed by an underwriting agency of the Ecclesia Group acting as an insurance agent for insurers, said company receives a commission from the insurer for its activities on behalf of the insurer. This commission is included in the insurance premium.

#### Arbitration board

Versicherungsbundsmann e.V., Postfach 080632, 10006 Berlin, [www.versicherungsbundsmann.de](http://www.versicherungsbundsmann.de); Ombudsmann private Kranken- und Pflegeversicherung, Postfach 060222, 10052 Berlin, [www.pkv-ombudsmann.de](http://www.pkv-ombudsmann.de)

#### Complaints

Complaints can be sent to the above address, or submitted via e-mail to [beschwerde@ecclesia-credit.de](mailto:beschwerde@ecclesia-credit.de) or by phone at +49 5231 603-8997.

Ecclesia Credit GmbH is exclusive partner of the International Credit Brokers Alliance (ICBA) for Germany. This global network comprises a tight-knit association of specialist brokers worldwide. Each of these brokers is a market leader in their country, ensuring excellent, global client support. The ICBA boasts 620 specialists in 63 countries who provide services to over 8,000 clients worldwide, with an insured volume of over 300 billion dollars. Our ICBA membership facilitates the implementation of the best possible service standards tailored to individual customer specifications in the countries involved.

# **Data Privacy Statement and Information in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR)**

## **General**

We attach great importance to your privacy and strictly adhere to data protection regulations when processing data.

Please forward this information to current and future authorized representatives, as well as any additional insured persons.

## **Name and contact details of the Data Controller**

Ecclesia Credit GmbH  
Ecclesiastrasse 1 - 4  
32758 Detmold/Germany  
Phone +49 5231 603-0  
info@ecclesia-credit.de  
www.ecclesia-credit.com

## **Contact details of the Data Protection Officer**

Ecclesia Credit GmbH  
Data Protection Officer  
Ecclesiastrasse 1 - 4  
32758 Detmold/Germany  
Phone +49 5231 603-6129  
Fax +49 5231 603-606129  
E-mail dsb@ecclesia-gruppe.de

## **Purposes for processing personal data and the legal basis for processing**

We process your data solely for the purpose of providing our insurance broker services. These services include the brokerage of insurance services and the associated coverage requests, the conclusion of contracts, contract administration, and the handling of claims. The legal basis for processing data is Art. 6, para. 1 lit. b of the GDPR.

If we did not collect your personal data directly from you (e.g., in the context of claim settlements), the legal basis for processing your data arises from Art. 6 para. 1 lit. f GDPR: the legitimate interest of ourselves or third parties. Our legitimate interest lies in efficiently supporting our clients in all aspects of their insurance needs, including claims handling and other insurance-related matters. Without this data processing, claims cannot be handled, or they can only be handled with difficulty.

Your explicit consent is required for the processing of special categories of personal data. The legal basis for this processing is established by Art. 9 para. 2 lit. a of the GDPR.

## **Categories of personal data that are processed**

Personal data is any information relating to an identified or identifiable natural person.

We process various categories of personal data in order to perform our services as an insurance broker. Examples include name, address, bank

details, communication data, insurance policy numbers, etc.

In general, special categories of personal data are processed with your consent. Among other things, this includes health data. The legal basis for processing data in such cases is provided in Art. 9, para. 2, lit. a of the GDPR. In general, special categories of personal data are processed with your consent. Among other things, this includes health data. The legal basis for processing in such cases is provided in Art. 9, para. 2, lit. a of the GDPR. Some cases require the processing of special categories of personal data for the assertion, exercise, or defense of legal claims. The relevant legal basis for this processing is provided by Art. 9, para. 2, lit. f.

## **Recipients of your personal data**

We will only disclose your personal data to third parties with your consent or if permitted by relevant legislation. In addition, our employees are obliged to maintain confidentiality and comply with the provisions of data protection legislation.

The transfer of your personal data to government entities that are legally permitted to receive it will only occur if it is required by law or if we are mandated to do so by a court or administrative ruling.

Matters such as coverage inquiries, contract conclusions, contract administration, and claims handling may require the transmission of your data to or from other entities. These entities include:

- policyholders,
- affiliated companies,
- insurers,
- reinsurers,
- insurance brokers,
- technical service providers,
- social insurance carriers,
- financial services institutions,
- lawyers and
- surveyors/experts.

For the technical execution of our services, Ecclesia Holding GmbH has been commissioned to process your personal data on our behalf as part of an order processing contract.

Data is only transferred to countries outside of the European Economic Area (EEA) if it is necessary for us to carry out our activities, if you have given us your consent, or if it is otherwise legally permissible. In such cases, we take measures to ensure the protection of your data. We only transfer data to recipients who ensure the protection of your data in accordance with the provisions of the GDPR for transfers to third countries (Articles 44 to 49 GDPR).

## **Your security**

We implement technical and organizational measures to protect your data from unauthorized

## **Data Privacy Statement and Information in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR)**

access, loss, manipulation, or destruction. Our security protocols are subject to constant updates in alignment with technological advancements.

### **Duration of data retention**

We store your personal data for the purpose of providing our insurance broker services and to comply with legal obligations. Once your personal data is no longer necessary for these purposes, it will be automatically deleted.

Our insurance broker services and their associated legal obligations encompass, in particular, the retention of documents and information within the framework of the statutory retention periods (up to ten years), and evidence of proper advisory and contractual performance within the statutory limitation period (up to thirty years).

### **Rights of the persons affected**

You are entitled to receive information concerning the data stored in relation to your person at any time. According to Articles 16 to 20 of the GDPR, you also have the right to request the correction of inaccurate data, deletion of your personal data, the restriction of its processing, and data portability.

#### **Right to object to processing**

Pursuant to Art. 21 para. 1 of the GDPR, you may object to the processing of your personal data carried out on the basis of Art. 6 para. 1 lit. f of the GDPR on grounds relating to your particular situation by contacting the responsible party at the above address. If you do so, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or unless the processing serves the purpose of asserting, exercising, or defending legal claims.

#### **Right to revoke consent**

You have the right to revoke your consent at any time with immediate effect for the future. However, the lawfulness of any processing carried out on the basis of consent prior to the moment of revocation shall not be affected.

### **Right to complain**

You have the right to file a complaint with a supervisory authority if you believe that the processing of your personal data represents an infringement of the GDPR.

### **Provision of your personal data**

We cannot provide insurance broker services if we do not process your personal data. This is why it is necessary to disclose your personal data.

In specific cases, such as in the event of claims, this may involve the voluntary provision of information. If this is the case, we will notify you. The personal data you provide will be processed solely for the purposes communicated to you.

### **Information about the sources of your personal data**

We use the following sources to collect personal data that you have not provided directly:

- Information provided by our clients
- Insurers
- Reinsurers
- Insurance brokers
- Social insurance carriers
- Lawyers
- Surveyors/experts
- Publicly accessible sources (e.g. official registers, address directories, internet)

### **Questions, suggestions, complaints**

If you have any further questions about the data protection information or the processing of your personal data, please contact us or our Data Protection Officer directly by using the contact information provided above.