# De Goudse

Privacy statement

**Customer** information

#### Who we are..

Geert Bouwmeester was only 22 years old when in 1924 he started his own company. A small space was converted into an office. The first policies were distributed by bike, a traditional Dutch mode of transport. Since then our company has gone through exponential growth and therefore a lot has changed. Despite our present size we are still an independent family business that has kept its entrepreneurial spirit.

#### Insurances for entrepreneurs

Our focus is on supplying insurance solutions for entrepreneurs. Men and women who work hard at achieving success for their companies, who seek security and convenience. And who are looking for good and practical insurance solutions for each phase of their entrepreneurship.

#### Independent advisors

Our society is becoming more and more complex. Both individuals and entrepreneurs have the need for advice given by third parties who know their specific requirements and can advise them accordingly. Therefore, we work closely with independent brokers, who like no other are capable of providing the right customized solution.



# Privacy statement of De Goudse

De Goudse is a financial company offering products and services through independent insurance advisers. The protection of your personal data and the careful handling of these data are very important to us. This privacy statement tells you what data we collect and how we handle them.

#### Introduction

De Goudse N.V. consists of several subsidiaries, such as Goudse Levensverzekeringen N.V., Goudse Schadeverzekeringen N.V. and Goudse Assurantiedesk B.V. (hereinafter referred to collectively as: De Goudse).

We ensure that all our subsidiaries comply with the General Data Protection Regulation (GDPR) and related legislation and regulations. The GDPR provides important safeguards for the protection of your personal data. You can find the full text of the GDPR in the Official Journal of the European Union (Regulation 2016/679). Further information can be found on the website of the Dutch Data Protection Authority (Dutch DPA) (autoriteitpersoonsgegevens.nl).

In addition, we comply with the Code of Conduct for Processing Personal Data by Insurers (Gedragscode Verwerking Persoonsgegevens Verzekeraars). This code of conduct (in Dutch only) can be found on the website of the Dutch Association of Insurers (Verbond van Verzekeraars) (verzekeraars.nl).

De Goudse is responsible for the personal data you provide to us. These data may be processed by all subsidiaries of De Goudse N.V. in accordance with the code of conduct.

If you are insured through an adviser, your adviser is responsible for the personal data you share with him or her.

If your organisation transfers personal data of employees to us, you are obliged to inform your employees about this. You can refer them to this privacy statement, so that they know how we handle their data.

# What personal data do we use?

When you or your employer apply for insurance with De Goudse, we will ask for your personal data. We receive these data through your adviser or directly via our website, by email or by telephone.

What data we specifically process depends on the type of insurance or contact we have with you. It may include the following types of personal data:

#### Name, address and contact details

Your name and address, email address and telephone number. We use these details so that we can contact you, send information and perform (insurance) agreements.

#### Financial data

For example, your bank account number (to collect premiums and make payments) and your income data if necessary for the execution of the insurance agreement.

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#### Citizen service number (BSN)

We ask for your BSN only if there is a statutory basis for doing so.

#### Additional data

Depending on the type of insurance or service, we may need additional information such as your date of birth, gender, occupation or licence plate. We use these data, for instance, to determine the premium or prepare the policy.

#### Data on contacts and communication

We register information on your contact moments with us, such as the content of the conversation and when it took place. In this way we can better provide you with a more targeted response the next time you contact us.

#### Website visit and IP address

We temporarily log your IP address when you visit our website. We do this to recognise digital threats and to act effectively in the case of security incidents. We keep this information for 45 days in order to be able to always look back for a minimum of one month.

#### Health data

We process health data only when necessary, for instance to:

- Assess the risk we can insure;
- Determine the extent of a loss or claim;
- Decide whether we need additional information or can provide immediate advice on settling the claim.

Medical data are processed solely by a medical adviser or staff from our medical service. We will only request additional medical data through or under the responsibility of a medical adviser.

If we need data from your physician, we will always ask for your prior consent.

# Criminal data

Sometimes we need details of your criminal record to assess an insurance application. These are only relevant facts from a period of eight years prior to the application.

Criminal information is processed only by employees authorised to do so.

#### What do we use your personal data for?

We use your personal data for the following purposes:

#### Performing your insurance or services

We use your data to assess applications, accept and execute insurance policies, provide services and settle payments.

# Handling claims

For instance, if you are involved in a claim as an insured person or an aggrieved party. Your data help us to handle the claim adequately.

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#### Meeting statutory obligations

Sometimes we are under the obligation to share data with, for example, the tax authorities, the Employee Insurance Agency (UWV), regulators or the police. We may also share data with other institutions under the Money Laundering and Terrorist Financing (Prevention) Act (Wwft).

# Ensuring safety and integrity

We use your data to ensure the safety and integrity of De Goudse and the insurance industry. This includes recognising, preventing and investigating (attempted) fraud or other reprehensible behaviour.

#### Customer satisfaction and marketing

We would like to hear how satisfied you are with De Goudse and how we can improve our services. We also like to keep you informed about relevant information, for example through newsletters. If you object to this, please let us know.

#### *Improving and innovating*

We also use personal data to perform analyses. We use those in order to:

- Better assess risks;
- Determine premiums more accurately;
- Improve processing;
- Develop new services.

When analysing data, we delete or anonymise personal data that are not needed. We also apply techniques to best protect your data.

# Statutory bases for processing [data]

We process your personal data only if a statutory basis is in place. This may occur in the following situations:

- For the execution of an agreement;
  - For example, if you apply for an insurance agreement or you make use of our services.
- To comply with statutory obligations;
  - For example, the duty to provide proof of identity or provide data to the tax authorities (information reporting), the Employee Insurance Agency (UWV) or regulators.
- To pursue a legitimate interest;
  - For example, if we are investigating possible fraud. We always carefully balance our interest and your privacy.
- With your consent.
  - For example, you give consent to receiving newsletters or the use of certain data for marketing purposes.

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#### Origin of data

We usually get your data from you, your employer, your legal representative or your adviser. We may sometimes receive data from third parties, for example:

- the Employee Insurance Agency (UWV) or other organisations implementing social insurance laws;
- the Key Register of Persons (BRP);
- the Netherlands Vehicle Authority (RDW);
- the Central Information System Foundation (CIS);
- the Tax and Customs Administration;
- other persons or organisations authorised on other grounds or by you.

# Protection of data

We consider it important to protect your data. Therefore:

- Only employees whose job require them to process data have access to your data;
- All our employees have a duty of confidentiality and have taken the oath or made a solemn affirmation that they will comply with legislation and regulations and codes of conduct, and act ethically;
- We only transfer data if there is a statutory obligation;
- Our systems and programs are appropriately secured and they are checked regularly;
- We protect your personal data against unauthorised access, loss or damage, destruction or misuse
- We ensure that data can be restored in the event of loss or damage;
- We impose demands on our suppliers and we check whether they comply with our safety standards:
- We ensure that you can use our websites safely.

#### Telephone calls and AI

We sometimes record telephone calls. We do this to:

- Determine the quality of our telephone service;
- Train, coach and assess our employees;
- Prevent and combat fraud.
- Improve our business operations.

To process these recordings we may use artificial intelligence (AI), such as text-to-speech technology and automatic summaries. These techniques help us to analyse and improve our telephone calls. We only use these AI techniques for the aforementioned purposes and not to make automatised decisions on you as a person.

The recordings and any generated texts are carefully secured; they cannot be accessed by unauthorised persons and cannot be adapted or manipulated. We do not keep them longer than necessary for the purpose for which they were collected.

# Copy of your identity document

Sometimes we ask you for a copy of your ID, such as a passport or driving licence. We ask this, for instance, for security reasons or to establish your identity. To secure your privacy, please make your passport photo and BSN or the Machine Readable Zone (MRZ) illegible on the copy. Also clearly indicate to whom you provide the copy and on what date. You can also use the government's KopielD app. With this app, you can easily make a safe copy.

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#### **Duration of data retention**

How long we keep your personal data depends on the purpose for which we have collected them. If you provided data for a quote, we store these data for a maximum of six months.

We keep data needed to conclude and execute an insurance contract for seven years after the end of the contract unless we are required by law to keep them for longer. In that case we adhere to the statutory retention period.

When your data are no longer needed for the purpose for which they were collected, we delete them.

Sometimes we may keep personal data anonymously for longer periods, for instance, for historical, statistical or scientific purposes. In that case we will take measures to ensure that the data are used only for these specific purposes and are properly secured.

#### Use of our website

We have taken measures to secure your visit to our website and prevent misuse.

If you visit our website, we may collect visitor data to promote website usability. Only employees who need these data may access them. They are under a confidentiality obligation.

We use cookies on our website. These are small text files that your browser stores on your device. On the cookie page of our website you can read how we use cookies and how you can manage them.

# Providing data to third parties

We will only provide your data to third parties if this is legally permitted and necessary for our business operations. Third parties include:

- Your adviser;
- Reinsurers;
- Postal companies;
- Research agencies;
- IT service providers;
- Companies to which we have outsourced tasks.

Data may sometimes be passed on to the Dutch Association of Insurers (Verbond van Verzekeraars) in the context of statistical research, or for validation purposes and for relationship management. We do not sell your data.

As part of a responsible acceptance, risk and fraud policy, we may provide your name, address, place of residence and date of birth to trade information agencies such as Experian Nederland B.V. in The Hague. If you have any questions about your registration with Experian, you can contact Experian by mail at <a href="inzage@experian.nl">inzage@experian.nl</a> or call 0900-EXPERIAN.

We are sometimes required to share your data with institutions, for example, to the Tax and Customs Administration, regulators, police or judiciary. We may also share data under the Money Laundering and Terrorist Financing (Prevention) Act (Wwft).

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We only transfer personal data to countries outside the European Economic Area (EEA) if this is in full compliance with the GDPR and other legal guidelines.

# Detection of fraud and abuse

To prevent and detect fraud, abuse and improper use, we may record and exchange personal data. We exchange data within De Goudse, with other financial institutions or with external investigation agencies. In doing so, we adhere to the Insurers and Crime Protocol and the Financial Institutions Incident Warning System Protocol (PIFI).

#### Event Administration System and Internal Referral Register

We use an Event Administration System to register situations that require special attention, for instance, in the event of suspected fraud. These data can only be accessed through our Special Affairs department. This system is linked to an Internal Referral Register. This only contains referral data, such as your name, date of birth or Chamber of Commerce number. This register cannot be consulted by other insurers.

# Incident Register and External Referral Register

Financial institutions may record the behaviour of persons or organisations that has resulted or may result in harm to the institution, its clients or employees or put the integrity of the financial sector at risk in an Incident Register. An External Referral Register is linked to this Incident Register. This Register only contains referral data, such as your name, date of birth or Chamber of Commerce number, which may be included only under strict conditions. Institutions affiliated to industry associations, such as the Dutch Association of Insurers, Dutch Banking Association and the Association of Dutch Healthcare Insurers have access to (part of) this register.

# Data exchange with the Central Information System Foundation (CIS)

We may access and record your data in the Central Information System (CIS) of insurance companies operating in the Netherlands. This helps to manage risks and prevent fraud. More information and the privacy regulations can be found at www.stichtingcis.nl.

# Profiling and automated decision-making

We may compile a profile of you based on the data you have provided, sometimes supplemented by information from public sources. This profile helps us assess risks and perform our services in the best possible way.

For some products, we assess your application through an automated process. The decision on your insurance is then first made by a program, based on your data and our acceptance rules. If you do not get insurance immediately, the application will be reassessed by an employee of De Goudse. If you disagree with the decision, you can object to it. You will then discuss this with an employee who will assess your application again.

# Your rights with regard to personal data

You have the right to have your personal data amended if they are incorrect. You may also request us to remove your data if:

- They have been processed unlawfully;
- They are no longer needed for the purpose that they were processed for; or
- You provided permission earlier but you have already revoked this permission and there is no other legal basis to process the data.

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You may also request to temporarily limit the processing of your data. This is possible for instance if.

- You are of the opinion that your data are incorrect;
- Your data are used unlawfully;
- You need the data for a legal procedure;
- You would like to transfer your data to another service provider;
- You have objected to the use of your data and the objection is still pending.

#### **Exercising rights**

If you wish to exercise your privacy rights, please send a request to:

De Goudse

For the attention of the Data protection officer

PO Box 9

2800 MA Gouda

or send an email to gegevensbescherming@goudse.com.

Please specify which right you wish to exercise. Also, if possible, indicate which personal data it relates to and during which period these data were collected or used.

To ensure that the request is made by you, we may ask you for a copy of a valid ID (such as a passport or driving licence). See "Copy of your Identity Document" earlier in this stement for instructions on how to provide a copy. Our Data protection officer will respond to your request as soon as possible, at any rate within one month.

#### Questions or complaints?

If you have any questions about this privacy statement or complaints about how we handle your personal data, you can contact the data protection officer, PO Box 9, 2800 MA Gouda or send an email to <a href="mailto:gegevensbescherming@goudse.com">gegevensbescherming@goudse.com</a>. In addition, you may file a complaint with the Dutch Data Protection Authority if you believe we have violated your rights.

#### **Amendments**

We may amend the text of this privacy statement due to new developments, such as changes in legislation or in our products and services.

#### **Entry into force**

This privacy statement is effective from 25 September 2025. This English translation has been prepared with due care. In case of any inconsistency or discrepancy, the Dutch version of this document shall be binding and shall prevail.

# Contact details De Goudse

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