

Information leaflet on data processing

Information relating to data protection with financing applications, loan agreements and other thus associated contracts with corporate customers

R+V Insurance Group - Raiffeisenplatz 1 - 65189 Wiesbaden
Status as of August 2024

1. What is the purpose of this information leaflet?

With this information leaflet, we are providing you with comprehensive information regarding the processing of company and personal data in connection with a financing application and/or a contractual relationship that is still to be concluded or was already concluded. We only process these data insofar as we are entitled or obligated to do so by law.

In the **Code of Conduct of the German Insurance Industry**, the German insurance industry has committed to not only strictly complying with the laws relevant to data protection, but also to promote data protection by means of further measures. You can find explanations in this respect in the Code of Conduct in the internet: www.code-of-conduct.ruv.de

There you will also find the companies of the R+V Insurance Group that have been using this Code of Conduct. Upon request we will be pleased to send you the Code of Conduct by post. Please contact our data protection officer if you wish to have this sent to you.

2. Contact data of our data protection officer

If you have any questions relating to data protection law please contact the data protection officer of the R+V Insurance Group:

R+V Versicherung AG
Data protection officer
Raiffeisenplatz 1
65189 Wiesbaden
Phone: +49 (0800) 533-1112
Fax: +49 (0611) 533-4500
Email: datenschutz@ruv.de

If you have any general questions relating to the underlying contractual relationship please use the **general contact options**. You can find all respective information online: www.ruv.de

3. How and when do we use company and personal data?

We require company as well as personal data (e.g. the beneficial owner; the authorised agent, the persons with signing powers or authorised to representation; the shareholders and/ or deviating owners, excerpts from the register of companies, etc.) in order to be able to estimate the risk before conclusion of the loan agreement and other thus associated contracts as well as for the processing of the contractual relationship, in particular for the financing application and contract examination with loan agreements.

We principally request you to only communicate data to us, which are necessary for the respective purpose (e.g. financing application and contract processing) or stipulated by law (e.g. owing to stipulations from the German Money Laundering Act, stipulations from tax law). If we request you to voluntarily communicate data to us we shall especially draw your attention to this fact. If there is a contractual or statutory obligation to provide the data and you refuse to do this it may result in the fact that we cannot conclude the contract.

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Furthermore and as permitted by law, we process the data for **advertising purposes or for market or opinion research**. **You can object to this use informally at all times with effect for the future. For example, you can send advertising objections by email to Darlehen@ruv.de.**

We will, if applicable, also process the data within the scope of the stipulations under data protection law for purposes which are not directly associated with the financing application, loan agreement or other thus associated contracts.

This can, for example, be the case in order to

- fulfil admissible regulatory requirements or requirements under supervisory law. With our main business activity we are thus subject to several special statutory regulations, in the framework of which the company and personal data are processed: e.g. combatting money laundering, account truth according to Section 154 German Fiscal Code, statutory reporting obligations to state authorities, Solvency II etc.
- check and optimise processes of electronic data processing
- to ensure IT security and IT operations
- to compile and, if necessary, evaluate data across companies in a legally permissible manner
- to evaluate and optimize means of demand analysis and direct customer contact
- to statistically evaluate the use of the R+V benefit program as well as the further development of benefits within the scope of the program and their calculation
- analyse annual financial statements and balance sheets
- create tariff calculations and to carry out internal controlling
- assert legal claims and for defence in case of legal disputes

4. Legal bases

In many cases the data processing is permitted by law, because it is necessary for the **contractual relationship**. This applies above all to the examination of the financing application and contractual documents as well as the portfolio contract processing.

In certain cases data processing is only permitted **if you explicitly grant your consent hereto**.

Examples:

- In some cases we will only process the data for advertising purposes if you have explicitly granted your consent hereto.

We will request this consent from you separately.

In other cases we shall process the data owing to a **general weighing up of interests**, i.e. we weigh up our interests against the respective interests of the data subject. One example: If we transmit data to specialised service providers owing to a process optimisation and this work is their own responsibility, we shall conclude contracts with these service providers. These ensure that the service providers comply with an adequate level of data protection.

5. Origin and categories of company and personal data

We principally collect **company and** personal data directly from the data subject. For example from your correspondence or contact forms.

In certain cases, however, it may occur that we receive **company and** personal data from third parties.

Examples:

- In case of **returned post**, specialised service providers will conduct address research in order to determine current address data.
- We receive data relating to **co-owners, deviating owners** through our borrower or intermediary, if we cannot collect the data directly from these persons.
We collect e.g. the name and the address.

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- We receive data relating to **deviating beneficial owners, authorised agents and persons with signing powers and persons entitled to representation, shareholders, etc.** from our borrower or intermediary, e.g. the name, the address and the date of birth, if we cannot collect the data directly from these persons.
- In case of **credit rating details** we receive credit rating information from specialised credit agencies. You can find more detailed information in this respect under Point 11.
- In addition, we receive data relating to your person through your responsible intermediary or consortium leader, e.g. within the scope of the recording of the application.

6. To whom do we transmit the data?

Within the scope of the financing application and/or contract, data may be transmitted to third parties:

a) Intermediaries

If you are supervised by an intermediary in loan matters, we will inform him of general financing application and contract data, which he needs for the advice and supervision. If you no longer want to be supervised by the original intermediary after conclusion of the contract, you can use your **right to revocation**. This shall also exist if the intermediary changes for other reasons, e.g. if he discontinues his business activity.

We principally transmit data to the intermediary within the scope of a general weighing up of interests or on a legal basis.

b) Contractors and service providers

On the internet you can access lists of the contractors and service providers with which permanent business relationships exist under www.code-of-conduct.ruv.de.

Upon request, we will be pleased to send you a print-out by post. Please contact our data protection officer for this purpose.

If we do not merely outsource "assistance functions", which are strictly bound to instructions, to service providers, but service providers independently perform further activities, there is a so-called function transfer under data protection law. Typical examples are experts, auditors or medical service providers. The data transfer to them takes place on the basis of our overriding legitimate interest, Art. 6 para. 1 f) GDPR (DSGVO).

If you can assert that, owing to your company-specific and/or personal situation, your interest that is worthy of protection outweighs the interest of the transmitting insurance company, you have a right to object to the data transmission in case of function transfers.

Please note that in order to exercise the right to object, it is not sufficient to if you refuse to transmit data to service providers in general or to a specific service provider without giving special reasons.

Service providers who perform tasks on their own responsibility can be found in the list of service providers mentioned above.

c) Centralised data processing within the R+V Insurance Group

Individual areas are centralised within the R+V Insurance Group, e.g. the debt collection, the telephone-based customer support or the data processing. Therefore company-related data, master data such as your loan number, the type of contracts or personal data (like e.g. the date of birth of the beneficial owner) are kept in a central collection of data; i.e. the general application, contractual and payment data.

Therefore, e.g. the address will, if applicable, only be stored once, even if you conclude contracts with various companies of the Group. This way incoming post can always be allocated correctly and in case of enquiries by telephone, the responsible contact can be named quickly.

All companies of the R+V Insurance Group, which are connected to the centralised data processing, can view these master data.

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The other financing application, contractual and payment data can, on the other hand, only be requested by the companies of the Group that manage the contract.

The following companies of the R+V Insurance Group are connected to the centralised data processing:

R+V Versicherung AG
R+V Allgemeine Versicherung AG
R+V Direktversicherung AG
R+V Krankenversicherung AG
R+V Lebensversicherung AG
R+V Lebensversicherung a.G.
R+V Pensionsfonds AG
R+V Pensionskasse AG
R+V Pensionsversicherung a.G.
R+V Rechtsschutz-Schadenregulierungs-GmbH*
R+V Service Center GmbH*
R+V Treuhand GmbH*
RUV Agenturberatungs GmbH*
Vereinigte Tierversicherung Gesellschaft a.G.
KRAVAG-HOLDING Aktiengesellschaft
KRAVAG-ALLGEMEINE Versicherungs-AG
KRAVAG-LOGISTIC Versicherungs-AG
KRAVAG-SACH Versicherung des Deutschen Kraftverkehrs VaG
KRAVAG und SVG Assekuranz Vertriebs- und Bearbeitungszentrum GmbH*
KRAVAG Umweltschutz und Sicherheitstechnik GmbH (KUSS)*
Condor Lebensversicherungs-Aktiengesellschaft
Condor Dienstleistungs-GmbH*
R+V Dienstleistungs-GmbH*
Pension Consult Beratungsgesellschaft für Altersvorsorge mbH*
carexpert Kfz-Sachverständigen GmbH*
CHEMIE Pensionsfonds AG
compertis Beratungsgesellschaft für betriebliches Vorsorgemanagement mbH*
UMB Unternehmens-Managementberatungs GmbH*

* This company is a service provider of the companies of the R+V Insurance Group and can therefore access company and personal data.

You can call the respective current list of the companies taking part in the centralised data processing under www.code-of-conduct.ruv.de. Upon request, we will be pleased to send you a print-out of this list by post. Please contact our data protection officer for this purpose.

d) Superordinate financial conglomerate company

We transmit company and personal data to DZ BANK AG as a superordinate financial conglomerate company if and insofar as we are obliged to do so by law. Such an obligation may arise from the rules of a proper business organisation, for example for an appropriate and effective risk management on group level.

e) Authorities, Central Banks and other bodies with tasks under public law

We transmit company and personal data to authorities, Central Banks and other bodies with tasks under public law if we are entitled or obligated to do so by law or as per contract.

Such a data transmission can be carried out at the request of an authority. We will then examine whether the authority may receive the data.

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In some cases we are obligated by law, in all other cases we will obtain your consent. There is a legal obligation e.g. with reports to the Deutsche Bundesbank owing to regulations under tax law or obligations from the German Banking Act.

f) Other parties involved in the financing application and/or loan agreement and other thus associated contracts

In contracts, in which there are other persons and/or companies besides the borrower, e.g. a deviating payer, it may be necessary to transmit data of the respective other person and/or companies in order to execute the contract.

7. Data transmission to third countries outside of the EU/EEA

If we transmit company and personal data within the EU/EEA we will comply with the strict legal stipulations.

If necessary we will transmit company and personal data to service providers in third countries outside of the EU/EEA, e.g. within the scope of IT services, or to experts. The selection and contractual agreements are of course oriented to the statutory regulations.

In case of certain types of contracts it may occur that we transmit the data to reinsurers in third countries outside of the EU/EEA.

Particularly in cases where the insured risk or the borrower is located in a third country, it may be necessary to transmit data to the third country (e.g. intermediaries, other borrowers).

In addition, there are statutory reporting obligations in certain cases, owing to which we must transmit the data to authorities and similar bodies in third countries outside of the EU/EEA.

Such a transmission may also be necessary with lawsuits with a reference to overseas (e.g. lawyers).

If your consent is necessary in an individual case we will obtain this separately.

8. How long do we store the data for?

If it is necessary we shall process company and personal data for the duration of our business relationship. This may also be the initiation or the processing of a contract.

In addition, we are subject to various storage and documentation obligations. These can be derived among others from the German Commercial Code (HGB), the German Fiscal Code (AO), the German Money Laundering Act (GWG) or the Insurance Company Accounting Regulation (RechVersV). Deadlines for the storage and documentation stipulated therein are 2 to 30 years.

The storage duration is oriented to the legal statutes-of-limitations, which for example according to Sections 195 et seqq. of the German Civil Code (BGB) may be up to 30 years; however the regular statute-of-limitation is three years.

You can find further information regarding our deletion deadlines in the internet:

<https://www.ruv.de/datenschutz/loeschfristen>. We will also be pleased to send you the list by post. Please contact our data protection officer for this purpose.

9. Which rights do you have?

You can assert your statutory rights to information, rectification, erasure, limitation to the processing and data portability to our data protection officer.

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If the data processing is based on a general weighing up of interests, you are entitled to a right to object to this data processing, if reasons arising from your personal situation speak against this.

10. Information obligation if we receive data about third parties from you

If we receive company and personal data from you from third parties, you must forward the information leaflet on data processing to these parties. These are e.g. deviating owners, deviating payers.

11. When will we obtain information on creditworthiness?

In case of financing applications for the conclusion of a loan agreement and other thus associated contracts as well as during the term of a contract R+V will transmit company and personal data (e.g. corporate name, last name, first name, address, date of birth) to commissioned credit agencies. This takes place in order to receive information pertaining to the previous payment behaviour and creditworthiness information based on mathematical-statistical processes by using address data. The legitimate interest in financial information exists in these cases from the time of the financing application, upon conclusion of and during the execution of these contracts owing to the future or existing financial default risk of R+V as the data provider.

Our partners are:

SCHUFA Holding AG,
Creditreform Wiesbaden Hoffmann & Nikbakht KG
Creditreform Boniversum GmbH

If you request information about the company and personal data, which the credit agency has stored, please contact the commissioned credit agency directly.

12. Right to lodge a complaint

You have the right to lodge a complaint with a responsible data protection supervisory authority; see Article 77, General Data Protection Regulation.