



# Information concerning the usage of your data

This information serves to inform you regarding the processing of your personal data by AXA. More Information regarding your rights according to data protection, legal bases of the data processing, the duration of data storage and the recipients of your personal data and details for automated individual case decisions, you can find under [www.axa.de/datenschutz](http://www.axa.de/datenschutz). We would be happy to send you the complete information concerning the usage of your data by post if you contact us at [Datenschutz@axa.de](mailto:Datenschutz@axa.de) or by post.

## Responsible for data processing:

The company named in the application or quote is responsible for data processing. You can contact our **data protection officer** by post at the address stated in the letter, for the attention of the "Datenschutzbeauftragter" – or via e-mail [Datenschutz@axa.de](mailto:Datenschutz@axa.de).

## Purpose of data processing

When you apply to take out insurance cover, we require the information you provide to conclude the policy and to appraise the risk we are about to underwrite. If the insurance policy is concluded, we process this data to manage the insurance relationship, for example to issue the policy and for invoicing purposes. We require information regarding a claim in order to determine whether a claim to insurance benefits exists and to quantify the extent of any such loss/claim.

In addition, we require your personal data to draw up statistics specific to the insurance industry, e. g. to comply with provisions issued by the supervisory authorities. We use all data processed by an AXA company to provide comprehensive advices. We process your data also to safeguard our legitimate interests or those of third parties. This may be required in particular:

- to guarantee IT security and IT operations, including tests.
- to advertise our own insurance products and other products sold by AXA Group companies and their cooperation partners as well as for conducting market and opinion surveys.
- to prevent and investigate criminal offences; in particular, we use data analyses and research (also from publicly accessible sources) to detect signs of potential insurance fraud.
- for business management purposes within the company and within the AXA Group as a whole.
- for business management purposes and for the further development of processes, services and products.

In addition, we process your personal data in order to fulfil legal obligations such as, for example, supervisory authority requirements, retention periods according to commercial and fiscal law and to comply with our duty to advise.

## Categories of recipients of personal data

### Data processing in the Group:

Specialised companies and domains of our Group of companies carry out specific data processing activities centrally, on behalf of the affiliated companies. If an insurance policy exists between you and one or several companies of our Group, your data may be processed by a Group company centrally for the administration of your address details, for our customer care service, for policy and claims management purposes, for collections and disbursements or for the collective processing of post. Our list of service providers contains the names of the companies involved in centralised data processing.

### External contractors and service providers:

To fulfil our contractual and legal obligations we may call upon some services provided by external contractors and service providers.

A list of the contractors and service providers we commission, with whom we enjoy established and not merely temporary working relationships, is available on the Internet under [www.axa.de/datenschutz](http://www.axa.de/datenschutz) for your information.

### Further recipients:

In addition, we may communicate your personal data to further recipients such as authorities in order to fulfil statutory reporting obligations (e. g. social insurance carriers, financial authorities or law enforcement authorities).

## Right of objection

**You have the right to object to the processing of your personal data for direct marketing purposes. Where we process your data to safeguard legitimate interests, you may object to the processing thereof if your particular situation constitutes grounds for an objection to data processing.**

## Detection and Information System of the (German) Insurance Industry

The undertakings of the German insurance industry use a detection and information system (Hinweis- und Informationssystem – HIS of informa GmbH) to appraise the risks specified in an application, to establish the facts when assessing claims and in order to combat insurance fraud. This requires the exchange of certain personal data with the HIS. Further information in this regard is available on the Internet under [www.axa.de/datenschutz](http://www.axa.de/datenschutz).

## Exchange of data with previous insurance providers

In order to be able to check and supplement, where required, the information you provide at the time the policy is taken out (e. g. for consideration of an existing no-claims bonus for Motor insurance) or the information you provide in the event of a claim, we may, to the extent required, exchange personal data with the previous insurance provider you named in the application.

## Credit information

Where required to safeguard our legitimate interests, we can make enquiries with the associations of Creditreform e. V. or Schufa Holding AG to obtain information regarding your general payment history.

Within the scope of the insurance relationship, AXA communicates personal data obtained from the application, the management and termination of this business relationship as well as data concerning non-compliant behaviour or fraudulent behaviour to the SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden. Article 6, Para. 1, Letter b and Article 6, Para. 1, Letter f of the EU GDPR constitute the legal bases of such communications. Information on the basis of Article 6, Para. 1, Letter f EU GDPR may be disclosed only where required to safeguard the legitimate interests of AXA or of third parties and provided that this does not outweigh the interests or fundamental rights and fundamental freedoms of the person concerned, which call for the protection of personal data. The exchange of data with SCHUFA also serves to fulfil legal obligations to conduct checks of the creditworthiness of customers (Sections 505a and 506 of the German Civil Code – BGB). The SCHUFA processes the data it receives and also uses such data for scoring purposes in order to provide its contractual partners in the EEA and in Switzerland and possibly other third countries (where an Adequacy Decision of the EC exists) with information, among other things for the appraisal of the creditworthiness of natural persons. Further information regarding the activities performed by the SCHUFA can be derived from the SCHUFA information sheet according to Article 14 EU GDPR and also online under [www.schufa.de/datenschutz](http://www.schufa.de/datenschutz).

## Communication of data to a third country

If we communicate personal data to a service provider outside of the European Economic Area (EEA), data will be communicated only if the European Commission has confirmed the adequacy of data protection afforded by the third country or in cases where other adequate data protection guarantees (e. g. binding internal corporate data protection guidelines, EU standard contract clauses or EU-US Privacy Shield) exist. Detailed information in this regard and also regarding the level of data protection afforded by our service providers can be requested using the contact information referred to above.

## Automated individual case decisions

On the basis of the risk information you provide us with as requested in the application, we reach a fully-automated decision whether to conclude or cancel the policy and also regarding any potential risk exclusions or the amount of premium you will be required to pay.

A fully automated decision regarding our obligation to pay compensation, bonuses and additional benefits / services is reached, based on the information you provide in the event of a claim, on the data stored in relation to your policy (and, where applicable, information received from third parties in this regard). The fully-automated decisions are based on rules to weight information as predefined by the company. This means that when an application is received, the calculation and appraisal takes place on the basis of actuarial criteria and calculations.



# Information regarding the exchange of data with informa HIS GmbH on the basis of Articles 13 and 14 EU GDPR

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We would hereby like to inform you that upon conclusion of an insurance policy or within the scope of claims processing we may communicate data referring to the subject of the insurance cover (e.g. vehicle identification data or address of the building) and your personal data (surname, first name, date of birth, address, previous addresses) to informa HIS GmbH (HIS enquiry). On the basis of this data, informa HIS GmbH checks whether any information concerning yourself and/or the subject of your insurance cover is stored in the "Hinweis- und Informationssystem der Versicherungswirtschaft" (HIS) – the Detection and Information System of the (German) Insurance Industry – which may indicate an increase in risk or irregularities relating to a claim. Such information is available only if it was previously reported to the HIS by an insurance provider (HIS log); The reporting insurance provider may have informed you separately in this regard. Data stored in the HIS based on information lodged in the HIS is communicated to us, the insurance provider requesting information, by informa HIS GmbH.

You can get additional information on the Internet under [www.axa.de/datenschutz](http://www.axa.de/datenschutz) or [Datenschutz@axa.de](mailto:Datenschutz@axa.de)

## Objective of data processing by informa HIS GmbH

informa HIS GmbH, as an entity responsible for data protection, operates the "Hinweis- und Informationssystem der Versicherungswirtschaft" (HIS) – the Detection and Information System of the (German) Insurance Industry. It processes personal data in the system to assist the insurance industry with its processing of insurance applications and claims. This data contains information regarding increased risks or anomalies which may indicate irregularities (e.g. where one and the same insured loss has been claimed from different insurance providers).

## Origin of the data stored by informa HIS GmbH

The data contained in the HIS stems exclusively from insurance companies which lodge the information with the HIS.

## Personal data categories

On the basis of the HIS enquiry or the HIS notification by an insurance company, informa HIS GmbH – depending on the type or line of insurance – stores the data contained in the enquiry or notification with the personal data used (surname, first name, date of birth, address, previous addresses) and information concerning the subject of the insurance (e.g. vehicle or building information) together with a record of the insurance company requesting or lodging the information. When information is lodged with the HIS, which you may possibly have been informed about separately by the insurance company, informa HIS GmbH stores information concerning increased risks or anomalies, which may indicate irregularities, only to the extent that such information was lodged in the HIS. In the Life insurance line of business, this may, for example, involve information about possible burdens (without reference to health data) and sum insured/pension level. In the case of vehicles, the information stored may concern write-offs, notional claim invoices or anomalies in connection with a previous claim. Building-related data refers to the number of claims and time period over which the building claims were made.

## Categories of recipients of personal data

The only recipients of personal data are insurance companies based in Germany and, in individual cases, the public investigation authorities involved in investigation procedures.

## The company and the data protection officer can be contacted at:

informa HIS GmbH  
Kreuzberger Ring 68  
65205 Wiesbaden  
Telephone: 0611/880 870-0



# SCHUFA-Information Sheet according to Article 14 EU GDPR

## 1. Name and contact details of the competent entity and of the company Data Protection Officer

SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden, Tel.: +49 (0) 6 11-92 78 0  
The company data protection officer at SCHUFA can be contacted at the above address, FAO: Abteilung Datenschutz (DP Dept.), or via e-mail at datenschutz@schufa.de

## 2. Data processing by SCHUFA

### 2.1 Purposes of data processing and legitimate interests pursued by SCHUFA or a third party

SCHUFA processes personal data to provide legitimate recipients with information so they can appraise the creditworthiness of natural and legal persons. This involves the calculation and communication of score values. It makes information available only if a legitimate interest is presented in an individual case and processing is permissible having taken all of the interests into account. A legitimate interest exists, in particular, before entering into business transactions which carry a risk of financial default. The credit check serves to safeguard the recipient against losses in credit business and, at the same time, it opens up the possibility to safeguard borrowers against getting into excessive debt by providing advice. The processing of data is also carried out to prevent fraud, to verify integrity, to prevent money laundering, to verify identity and age, for address research, for customer services or risk management purposes as well as for the application of prices and T&Cs. SCHUFA shall communicate any changes in the purposes of data processing in accordance with Article 14, Para. 4 EU GDPR.

### 2.2 Legal bases of data processing

SCHUFA processes personal data on the basis of the provisions of the EU GDPR. Processing is carried out on the basis of declarations of consent and on the basis of Article 6, Para. 1 (f) EU GDPR insofar as processing is required to safeguard the legitimate interests of the entity responsible or those of a third party and provided that this does not outweigh the interests or fundamental rights and fundamental freedoms of the person concerned, which call for the protection of personal data. Declarations of consent can be withdrawn at any time with respect to the contractual partner concerned. This applies also to declarations of consent which were issued before the EU GDPR entered into force. Withdrawal of a declaration of consent shall not affect the legality of personal data processed before consent was withdrawn.

### 2.3 Data origin

SCHUFA receives its data from its contractual partners. These are institutes, finance companies and payment service providers based in the European Economic Area, in Switzerland and potentially in third countries (where an Adequacy Decision of the EC exists) which carry a risk of financial default (e.g. banks, savings banks, cooperative banks/credit unions/mutual savings banks, credit card companies, factoring companies and leasing companies) as well as other contractual partners which use SCHUFA products for the purposes referred to under Section 2.1, in particular from the mail order, trading, eCommerce, service, leasing, power supply, telecommunications, insurance or collections sectors. In addition, SCHUFA processes information from generally accessible sources such as public directories and official notices (debtors' lists, insolvency announcements).

### 2.4 Categories of personal data which are processed (personal data, payment history and commitment to contracts)

- Personal data, e.g. surname (possibly also information regarding previous names, subject to special application), first name, date of birth, place of birth, address, previous addresses.
- Information regarding the conclusion and contractually-compliant execution of business (e.g. current accounts, instalment credits, credit cards, accounts subject to protective orders, basic accounts).
- Information regarding undisputed, payable and repeatedly dunned or titled receivables and the outcome thereof.
- Information regarding improper or otherwise fraudulent behaviour such as identity fraud and fraudulent misrepresentation of creditworthiness.
- Information from public records and official notices.
- Score values

### 2.5 Categories of recipients of personal data

Recipients are contractual partners based in the European Economic Area, in Switzerland and potentially in third countries (where an Adequacy Decision of the EC exists) as defined under Section 2.3. Further recipients may include external contractors of SCHUFA according to Article 28 EU GDPR as well as external and internal SCHUFA entities. In addition, SCHUFA is subject to the legal powers of intervention afforded to government agencies.

## 2.6 Data storage period

SCHUFA stores personal data for a certain period only. The defining criterion for the setting of this time limit is "necessity". SCHUFA has defined indicative time limits for the examination of the necessity to continue to store or to delete personal data. Accordingly, the general period of storage of personal data is three years to the exact day of completion of processing. Other rules for deletion apply to other types of data:

- Information regarding enquiries after 12 months, to the exact day.
- Information regarding intact contract data regarding accounts documented without justified reason (e.g. current accounts, credit cards, telecommunication accounts or power supply accounts), information regarding contracts which, by law, require verification of evidence (e.g. accounts subject to protection orders, basic accounts) as well as sureties and trading accounts which are managed on the credit side, immediately following the announcement of termination.
- Data from the debtors' lists of the central enforcement courts after three years to the exact day, but earlier if SCHUFA is provided with proof that the central enforcement court has deleted such data.
- Information relating to consumer/bankruptcy proceedings or residual debt exemption proceedings after three years, exactly to the day of termination of the bankruptcy proceedings or the granting of exemption from residual debt. Earlier deletion can also take place in special individual cases.
- Information concerning the rejection of an application to file for bankruptcy due to a lack of assets, the lifting of safety measures or regarding the refusal to grant exemption from residual debt after three years, to the exact day.
- Previous addresses relating to individuals remain stored for a period of three years to the exact day; this is followed by a subsequent examination of whether these need to be stored for a further three years. They are subsequently deleted as of the exact day, if a longer period of storage for identification purposes is not necessary.

## 3. Data subjects' rights

Each data subject has the right to request SCHUFA to provide information according to Article 15 GDPR, has the right to have data amended according to Article 16 GDPR, has the right to have data deleted according to Article 17 GDPR and has the right to limit data processing according to Article 18 GDPR. SCHUFA has opened a service center to handle the concerns of private customers; it can be contacted by post at SCHUFA Holding AG, Privatkunden ServiceCenter, Postfach 10 34 41, 50474 Köln, by telephone under +49 (0) 6 11-92 78 0 and using an Internet form at [www.schufa.de](http://www.schufa.de). In addition, it is possible to contact the data protection officer responsible for the German state of Hesse, which is the supervisory authority responsible for SCHUFA. Declarations of consent can be withdrawn at any time with respect to the contractual partner concerned.

**According to Article 21, Para. 1 EU GDPR, data processing can be objected to for reasons which arise from the special situation of the person concerned. The objection can be sent to the following address: SCHUFA Holding AG, Privatkunden ServiceCenter, Postfach 10 34 41, 50474 Köln.**

## 4. Scoring

SCHUFA information can be supplemented by so-called score values. Scoring involves a forecast of future events drawn up on the basis of previously accumulated information and past experiences. The calculation of all Score values at SCHUFA is essentially based on the information SCHUFA has stored on a data subject, which is also shown in the information according to Article 15 EU GDPR. In addition, SCHUFA takes the provision of Section 31 of the German Federal Data Protection Act (BDSG) into account in the scoring. Based on the entries concerning an individual, he or she is assigned to a statistical group of persons who had similar entries in the past. The applied procedure is described as a "logistic regression" and it is an established and historically tried and tested statistical and mathematical method of forecasting risk probabilities. The following types of data are used by SCHUFA to calculate the score, whereby not every type of data is included in each individual score calculation: General data (e.g. date of birth, gender or number of addresses used in business transactions), previous payment disruptions, credit activity in the previous year, credit usage, long credit history and address data (only where there is little personal information relevant to credit available). Certain information is neither stored nor taken into consideration in the calculation of the score values, e.g.: Information concerning the nationality or special categories of personal data such as ethnic origin or information regarding political or religious tendencies according to Article 9 EU GDPR. Also the assertion of rights according to EU GDPR, i.e. access to the information stored by SCHUFA according to Article 15 EU GDPR, does not bear any influence on the score value calculation. The communicated score values help contractual partners make decisions and the values are adopted in their risk management. Risk assessment and appraisal of creditworthiness is carried out solely by the direct business partner as it alone has lots of other kinds of additional information – from a credit application for example. This still applies even if it relies solely on the information and score values provided by SCHUFA. In any event, a SCHUFA score alone is not reason enough to refuse to conclude a contract. Further information concerning the scoring of creditworthiness or on how to identify conspicuous circumstances is available under [www.scoring-wissen.de](http://www.scoring-wissen.de)

