

# PRIVACY POLICY

## Privacy Policy of Insure Consult GmbH

Version dated 12.01.2026.

This Privacy Policy explains how Insure Consult GmbH (hereinafter also referred to as "we", "us" or "our") gathers and processes the personal data of data subjects (e.g. clients, business partners, etc.) (hereinafter referred to as "you" or "your") within the scope of our business activity.

This Document addresses how personal data is collected and processed in accordance with the Swiss Federal Act on Data Protection, SR 235.1 (hereinafter "**FADP**"). This is not an exhaustive description; if necessary, other Privacy Policies or Terms and Conditions govern specific matters. Personal data comprises all information that relates to an identified or identifiable natural person.

If you provide us with the personal data of other persons (such as your employees, family members, work colleagues), please ensure that these persons are familiar with this Privacy Policy and only share their personal data with us if you are allowed to do so and if the data is accurate. If you transfer or inform us of personal data of third parties, we will presume that we are permitted to process this data for the respectively intended purpose. Where we use the term "you" or „our“ in the remainder of this privacy notice, this also includes other persons, such as your employees or other natural persons (i.e. data subjects) whose data are provided to us by you or on your behalf. As a company active in Switzerland, Insure Consult GMBH is generally subject to Swiss data protection provisions.

### 1. The Controller or the processing of your personal data is

Insure Consult GmbH

Rothusstrasse 21, 6331 Hünenberg, Switzerland

Website: <https://www.insurecons.com>

E-mail: [dataprotection@insurecons.com](mailto:dataprotection@insurecons.com)

**The contact for all data processing and any related questions is:** Insure Consult GmbH, Rothusstrasse 21, 6331 Hünenberg, registered office: Hünenberg.

Should you have data privacy concerns, please contact us at the following address: Insure Consult GmbH, Rothusstrasse 21, 6331 Hünenberg; or per E-mail: [dataprotection@insurecons.com](mailto:dataprotection@insurecons.com).

### 2. Duty to provide personal data

Within the scope of our business relationship, you must provide the personal data necessary to initiate and execute a business relationship and to fulfill the corresponding contractual duties (in general, you are not subject to a statutory duty to provide us with data). Generally speaking, we will not be able to conclude or process a policy with you (or an office or individual who represents you) without this data.

### 3. Collection and processing of personal data

Insure Consult GmbH is an independent insurance broker and consultant. We primarily process personal data that you provide to us. For our business relationship with you, it is necessary that you provide us with the personal data required for this purpose, as we are generally unable to enter into or perform a contract with you without this information.

In accordance with the applicable law, we process the categories of personal data listed below. We (and, where applicable, third parties) process this data for the specific purposes and based on the legitimate interests detailed in Section 4 below:

- contact details, personal and identification data, such as name, email address, telephone/mobile number, gender, passport number, identity card number, IP addresses
- online and technical data, such as IP addresses, browser history, social media handles, computer, device and connection information, usage data, cookie IDs
- banking, financial and payment data, such as account number, payment method, credit information, bank details
- Insurance data, such as broker mandates, analyses and reports, application data, service offers, insurance policy data, collection data, claims data, information on the insured risk, expert opinions, details from the previous insurer on the claims history, contract duration, and insured risks;
- communication data, such as emails, letters, video conferences, responses to messages
- legal and compliance data, such as data from administrative or judicial proceedings, data relating to sanctions, media reports, and data relating to the exercise of shareholder rights;
- website, when you visit our website, certain data is automatically stored on our servers or on the servers of service providers and products that we use and/or have installed for the purposes of system administration, statistics, security or tracking. This data includes: the name of your Internet service provider; your IP address (under certain circumstances); the version of your browser software; the operating system of the computer used to access the website; the date and time of access; the website from which you accessed our website; the search terms you used to find the website. In doing so, we process personal data on the basis of our legitimate interests.
- Other data: In addition to the data you provide to us directly, the categories of personal data that we obtain about you from third parties in particular comprise data from public registers, information that we obtain in connection with official and legal proceedings, information in connection with your professional functions and activities, credit reports, information about compliance with legal requirements, information from banks, insurance companies or other contractual partners of ours for the utilization or provision of services by you (such as completed payments, information about you from the media and internet, your residential or business addresses for the purpose of building new business relationships).
- In the event of a loss, if you seek reimbursement from the insurers we collect and process all loss-relevant information, including reports, photographs, expert assessments or further loss related information requested by the insurers.
- In addition, we process publicly available data (e.g. from debt collection, land, or commercial registers, or from media sources) and data collected automatically (e.g. through your use of our website).

## 4. Purpose of data processing and legal basis

### 4.1. Conclusion and performance of contracts

We process personal data in connection with, among other things, the conclusion, administration, performance and execution of contracts, the provision, management and delivery of our services, tenders, the preparation of quotations, risk management, credit checks, consulting and support, claims assessment and processing, and premium calculation. In doing so, we process personal data for the purpose of initiating or executing a contract.

### 4.2. Payment processing

In addition, we process personal data for the purpose of processing payments (e.g. with regard to insurance premiums and adjustments thereto). In doing so, we process personal data for the purpose of initiating or executing a contract.

### 4.3. Corporate management

We also process data for the purposes of our risk management and as part of prudent corporate governance, including operational organization and corporate development. In this way, we process data specifically for our administration and accounting and to ensure our operations (e.g. IT). In doing so, we process personal data based on our legitimate interests and in compliance with our legal and regulatory obligations.

### 4.4. Compliance with legal and regulatory obligations

We process personal data to comply with laws, regulations, and directives issued by authorities, as well as with internal policies. We also process personal data for investigations carried out under our legal and regulatory obligations, including under the Anti-Money Laundering Act, insurance supervisory law, and obligations relating to the prevention of terrorist financing. This includes, in particular, authentication and identification within the scope of 'Know Your Customer' (KYC) procedures, necessary clarifications and reports, and the processing of data in the context of official investigations. We conduct regular screenings, during which we may carry out checks relating to sanctions, warnings, fit-and-proper requirements, political exposure, and adverse reporting. In doing so, we process personal data to comply with our legal and regulatory obligations.

### 4.5 Marketing and development

We also process personal data for market research, service and operational improvement, and product development.

We conduct market and opinion research to continuously develop and enhance our products and services. In addition, we may offer other relevant products and services and communicate these through marketing materials. We also process personal data for the organization and delivery of events and seminars, as well as for relationship management.

### 4.6 Communication

We process personal data in order to communicate with (potential) customers and third parties and to respond to their enquiries or feedback. We also process personal data to administer, investigate, and

resolve claims or complaints, particularly in connection with insurance policies and services provided. In this context, we process personal data for the purpose of initiating or executing a contract.

#### 4.7. Security

To ensure security, we implement measures for IT and facility security. We also carry out internal investigations to prevent and detect fraud and other criminal offences. In doing so, we process personal data on the basis of our legitimate interests and to comply with our legal and regulatory obligations.

#### 4.8. Legal claims and regulatory proceedings

We actively assert legal claims and defend ourselves in legal proceedings. For example, we process personal data for dispute resolution, the enforcement of agreements, and the pursuit of debtors and recovery of outstanding receivables. In doing so, we process personal data on the basis of our legitimate interests and to comply with our legal and regulatory obligations.

#### 4.9. Business transactions

We process personal data in the context of business transactions (e.g. the purchase and sale of business units, parts of companies or companies) and corporate law activities. We also process personal data in the context of our corporate management and further development, in particular by transferring business records to successor companies and performing due diligence checks for transactions. In doing so, we process personal data for the purpose of initiating or executing a contract and based on our legitimate interests.

#### 4.10 Your Permission/Consent

If your or the data subject's consent is required and if you have given us permission to process your personal data for specific reasons, we shall process your personal data within the scope of and based on this consent. Once issued, consent may be withdrawn at any time, which, however, has no impact on data that has already been processed, but will apply exclusively to future data processing.

### 5. Cookies/tracking and social plug-ins in connection with the use of our website, Insure Consult Online or the Network Partner Interface online platform: no personal data is transmitted.

We use the services of Google Analytics on our website, with Google Ireland acting as our data processor and Google LLC in the USA acting as its subprocessor. We use Google Analytics to measure and analyze the usage of the website. Google uses performance cookies for this purpose to track the use of our website and visitors' actions on our website, for example, the period spent on a certain page, the number of page retrievals, geographic origin of the access, etc. and creates reports on this basis regarding the usage of our website. We ask for your consent before we use such cookies. Performance cookies that we use in this context have an expiration period of up to 24 months.

We have configured Google Analytics in such a way that the IP addresses of visitors from Google in Europe are truncated before transmission to the USA, so they cannot be traced back. We have disabled the "data transmission" and "signals" settings. Even though we can assume that the information we share with Google is not personal data to Google, it is possible that Google can use this data to identify

the visitors for its own purpose, create personalized profiles and attribute this data to the Google accounts of these persons. If you agree with the use of Google Analytics, you explicitly consent to such processing, which also includes the transmission of personal data (in particular, usage data relating to the website and the app, device information and personal IDs) to the USA and other countries.

You can find information from Google Analytics about data privacy here:

<https://support.google.com/analytics/answer/6004245>

## 6. Forwarding of data and data transfer abroad

Within the scope of our business activities and the purposes listed in section 4, provided it is permitted and we deem it to be appropriate, we also share personal data with third parties because they process this data for us.

In particular, this includes the following entities:

- Our internal and external service providers (such as Insurers, banks, consulting firms, law firms)
- network partners such as Marsh UK and MC Gill&Partners , sub-contractors and other business partners in the course of the performance of our contractual duties toward you;
- customers and their legal representatives or contact persons;
- domestic and foreign authorities, agencies or courts;
- other parties in potential or actual legal proceedings;

As explained above, we also disclose personal data to other recipients, some of whom are located outside Switzerland. We may therefore transfer your personal data within Europe and to other countries worldwide, provided that the Swiss Federal Council has recognised an adequate level of data protection in those countries. If a recipient is located in a country that does not provide an adequate level of data protection, we will contractually require the recipient to comply with the applicable data protection standards (for this purpose, we use the European Commission's revised Standard Contractual Clauses with the Swiss add-ons), unless the recipient is already subject to a legally recognized framework that ensures adequate data protection, or an applicable derogation applies. Such derogations may apply, for example, in the context of foreign legal proceedings, for reasons of overriding public interest, where the performance of a contract requires such disclosure, where you have consented to it, or where the data concerned have been made publicly accessible by you and you have not objected to their processing. Please note that data exchanged over the internet is frequently routed through third countries. Your data may, therefore, be transferred abroad even if the sender and recipient are located in the same country.

## 7. Retention period for personal data

We process and store your personal data as long as is required to meet our contractual and legal duties or the intended purposes of the data processing, which means for the duration of the business relationship (from the initiation, processing and through to the termination of a policy) and beyond in accordance with statutory retention and documentation duties. In the process, it is possible that personal data is stored for the period in which claims can be asserted against our company and in the

event that we are otherwise legally obligated to do so or legitimate business interests require it (such as for evidence and documentation purposes).

After the end of our relationship with you, the data retention period depends on our statutory record keeping obligations and the duration of statutes of limitations on claims which may be raised between us.

## 8. Data security

We implement suitable technical and organizational security measures to protect your personal data from unauthorized access and misuse, for example, physical and digital access controls and restrictions, the encryption of data carriers and transfers, guidelines for handling personal and business data, data protection and compliance training and the ongoing monitoring of these measures.

## 9. Rights of the affected individual

According to Art 32 FADP You and/or the data subject have the right within the scope of the data protection law applicable to you – and where provided for thereunder – to receive information as to which data about you is processed by us and for what purpose, the right to rectification and deletion of your personal data, and the right to the restriction of the data processing, as well as the right of data portability regarding certain personal data. You can furthermore object to data processing at any time, in particular as regards direct marketing measures. Please note that the exercise of these rights may conflict with contractual agreements and this may result in early termination of the policy or costs. We shall notify you in advance whenever this has not been regulated in a contract.

The exercise of such rights usually requires that you provide clear proof of your identity (such as a copy of your ID, if your identity is otherwise not clear or cannot be verified) when it is still unknown to us. You may contact us at the address stated under section 1 in order to assert your rights.

## 10. Automated Decision-Making

We do not generally use automated decision-making within the meaning of Art. 21 FADP. If automated individual decisions are used in specific cases, data subjects will be informed accordingly.

## 11. Profiling

We do not conduct profiling.