# Privacy statement

## We handle your personal data with care

Your privacy is important to Nationale-Nederlanden and that is why we handle your personal data with care. For this, we take obvious measures, as well as those that are less apparent. This privacy statement gives you information about how we handle your personal data.

## What is personal data?

Say, for instance, you would like to take out one of our insurance products or submit a claim, then we'll ask you for personal data, like your name and address. If you visit our websites, we may gather personal data about you, such as your computer's IP address.

Personal data is information that tells us something about you or that we can link to you. We refer to the collection, retention and use of your personal data as 'processing'. 'Processing' is a legal term. When processing your personal data, Nationale-Nederlanden complies with applicable laws and regulations, including the provisions of the General Data Protection Regulation (GDPR) and the Dutch Association of Insurers' Code of Conduct for the Processing of Personal Data. Below we set out the purposes for processing personal data and the information concerned.

Dutch Association of Insurers' Code of Conduct for the Processing of Personal Data

## For what purposes do we process your personal data?

We only keep and use your personal data for clearly established purposes. In most cases, you yourself give us this personal data because you are taking out one of our products, or because you intend to. This is referred to in legislation as 'processing of information that is necessary for the execution of a contract'. What it boils down to is that we can't serve you as a customer if we cannot store your information.

Your personal data is also used because we have a centralised customer administration, for marketing purposes, to prevent and combat fraud, or to use this information for risk management purposes. In law, this is referred to as 'processing data based on legitimate interests'. This may be in your own interest, because we will then be in a better position to help you and to tackle fraud. We may also process your information to comply with legal obligations. More information about the basis on which we process your personal data is given below.

nationale nederlanden

### For executing our contracts

- To be able to assess your request for a product
- To be able to help you as the customer. In other words, for concluding, managing and/or providing our products and/or for advising you on our products. To ensure that our administration systems and applications are working properly and, by doing so, safeguarding the continuity of our services, we may also process your personal data in the context of managing, and testing, these systems and applications.
- To provide information to and receive information from other organisations if it is necessary in connection with the implementation and management of your product. Here we have in mind other banks, your insurance broker or your mortgage broker. For instance, we notify your broker if you are behind in your payments.

### On the grounds of a legitimate interest

#### For our centralised customer administration system

Nationale-Nederlanden has a centralised customer administration system. This is used, for example, by our customer services department to see which products you have with us, so that we can help you properly and quickly. The kinds of information we use in our customer administration include your name, your date of birth, your address details, other contact details, information about the products you have taken out with us, payment details, marketing information and (for insurance purposes) information about claims. We may also share your information with your financial consultant, for instance to ensure that this information is correct.

#### For marketing, communications and innovation purposes

We use your information:

- To ensure that our services match your personal circumstances. This could include, for instance, offering you different Nationale-Nederlanden products that suit your circumstances.
- For data analysis and for innovations that use data analyses, such as developing and testing applications that use artificial intelligence. We do this so that we can improve our processes and range of services and products, and to ensure that they are better aligned with the wishes of existing or potential customers. We may use analyses among other things to group customers with the same attributes or behaviour, i.e. to create profiles.
- To keep you informed via our website or the NN app, by letter or by email.
- To analyse and improve the effectiveness and quality of our email communications. For this we use tracking pixels. These are invisible images that are placed in emails. A tracking pixel makes it possible for us to see whether you have opened an email that we sent you. This allows us to also use a tracking pixel to demonstrate this.
- To give you a more personalised experience on our websites and apps or to offer you advertisements that suit your interests on other websites. For this, see also the cookie statement on our website.
- In the context of managing, and testing, our systems and applications, to ensure that they are working properly, and by doing so safeguarding the continuity of our processes.

Your permission is required for certain marketing activities. We will always ask for your permission in advance. If you have given us permission previously, and you would like to withdraw it, then we make sure that this is easy to do, for instance by clicking on the link at the end of the email.

#### To combat fraud

To protect you and financial institutions, we process personal data for risk-management purposes and to prevent and combat fraud. We may use AI for this. For instance, for mortgage products we use algorithms based on a selection of personal data to calculate the risk of fraud. If this results in a high score for risk of fraud, a member of staff will then assess the application. We may exchange information within Nationale-Nederlanden itself, with other financial institutions or with external research agencies.

We keep centralised incident records to safeguard the security and integrity of Nationale-Nederlanden companies. This is managed by our Security Affairs department. We have one incident administration for all our companies. We may include personal data in these records related to incidents that may be of interest and thus require special attention. Via the Security Affairs Department, we make information kept in our incident records available to all companies that fall within Nationale-Nederlanden group. By means of the Internal Reference Register linked to the incident administration, our employees can receive a signal on the basis of which they must further investigate an application or claim for damages.

Based on the Financial Institutions Incident Warning System Protocol (PIFI), Nationale-Nederlanden also keeps records in its so-called ‘incident register’ about legal or natural persons that have or may compromise Nationale-Nederlanden, our customers or members of staff, or that may prejudice the integrity of Nationale-Nederlanden. According to the rules of the protocol, the information kept in the incident register may be exchanged with other financial institutions, for instance, for the purposes of fraud investigations. Using the external referral register linked to our own incident register, other financial institutions may be sent a warning based on which they may examine an application or claim more closely.

### To be able to assess risks more effectively

We process personal data for statistical analysis so that we are in a better position to assess risks and set the prices for our products. We may use artificial intelligence for this. For instance, we may process data to manage the risk of potential payment arrears when entering into or executing contracts.
We keep data so that we have access to the right information if there is a complaint or a dispute.

### Processing third-party data

Sometimes we record information belonging to people other than our customers, such as aggrieved parties, administrators, beneficiaries, joint account holders and people who have provided security for a customer. We only do so if it is necessary for the execution of a contract we have entered into with a customer.

### To comply with legal obligations

As an insurance company and a bank, we have to comply with various legal obligations, and for this we process personal data belonging to you, joint account holders and sometimes family members and next-of-kin.

Pursuant to the Dutch Money Laundering and Terrorist Financing (Prevention) Act (Wwft), Sanctions Act 1977 and other legislation. For this, we may ask to identify yourself based on proof of identity and we may ask you questions about certain transactions and the origin of your capital. We ask business customers and suppliers who owns the organisation, or who has control or an interest in it, in other words, who the ultimate beneficial owner is.

To be able to provide certain products, we are obliged to share your information with the Dutch Tax and Customs Administration.  For this, we may share your name, address, date of birth, citizen service number, information about your credit balance at our bank and your country of residence for tax purposes in connection with the tax return completed in advance. In turn, the Tax and Customs Administration will report information from people who are classified as 'specified US persons' to the tax authorities in the United States.

Under the Financial Supervision Act (Wft), we have a duty of care to prevent you from being faced with payment issues. That is why we may submit a request for information to the Dutch Credit Registration Office if you apply for a loan, such as a mortgage, and we may inform them of payment arrears, if applicable.

We may also disclose your personal data to other competent organisations if we are obliged to do so. Here we have in mind supervisory authorities such as De Nederlandsche Bank and the Dutch Authority for the Financial Markets, the police, the public prosecutor's offices or the intelligence services.

## Which personal data do we process?

### Personal data that you have given us. This concerns:

- General information such as your name, address, telephone number, email address and date of birth.
  - Information to be able to identify you, for instance a copy of your identity card or passport and a selfie. Your account number so that we can receive payments from you and can make payments to you, or to give you insight into those payments
- Financial information, such as income data. We may ask for financial information in some cases, such as when applying for a mortgage.
- Information that we need for a specific product, such as a vehicle registration number for vehicle insurance.
- We also need your citizen service number for certain products, such as banking products, life assurance, health insurance, pensions and income protection insurance.
- We may ask you if you have a criminal record for risk assessments when taking out non-life insurance. For the purposes of carrying out a risk assessment for insurance, such as non-life insurance or income protection insurance, Nationale-Nederlanden may ask questions about criminal records concerning you or other interested parties when applying for insurance. In that case, we would like to know whether you or someone else who has an interest in the insurance has had dealings with the police or the Ministry of Justice in the previous eight years. By this we mean an ongoing investigation, or that you are or have been a suspect, i.e. the case against you was dismissed, have been convicted of a crime, involved in the enforcement of a punishment or sanction or have been discharged from all prosecution. If these events took place more than eight years previously, then you are under no obligation to report them, nor are you obliged to do so if we don't specifically ask you to. Nationale-Nederlanden uses criminal records to be able to assess the insurance application and to invoke the applicant's failure to comply with his/her duty of disclosure. Nationale-Nederlanden may also process criminal prosecution records to prevent and combat fraud and abuse. We process this information on the grounds of Section 33 of the General Data Protection Regulation (Implementation) Act and the Dutch Association of Insurers' Code of Conduct for the Processing of Personal Data. In the process, we comply with the protocol for the Financial Institutions Incident Warning System Protocol.

- Location information (of your telephone or tablet). For security reasons, we check information to see where you are located when we carry out the identity check. We only use this location information for this purpose. We can also process location data with your permission to give you a better user experience in the NN app, for example.

### Special personal data

We are only permitted to process special personal data if it is necessary to comply with legal obligations or if you have given us your express permission to do so. This kind of information includes information about your political opinions, membership of a trade union, medical records and biometric information used to identify you. That may be the case, for instance, if we ask you to identify yourself, to verify your identity document and if we process your bank transactions.

### Medical information

We also need your medical records if you take out term life insurance or occupational disability insurance. We get this information from you, your employer or a doctor, provided we have your authority to do so. The processing of medical records takes place under the responsibility of a medical adviser, i.e. a doctor. The medical adviser will only disclose medical records to other people at our organisation if they need this information for the performance of their work. These other persons are subject to the same duty of confidentiality as the medical adviser, i.e. based on doctor-patient confidentiality.

### Additional information

By 'additional information', we mean extra information that we were not given by you or your consultant, but which we retrieve from other (public) sources. Examples of this include consulting information required to combat terrorism and money laundering, or consulting information held by the Credit Registration Office. In certain cases, we do this to assess a risk or to comply with legal obligations. More information on this subject is available on the page entitled 'From whom do your get personal data?' For some payment services, we require the bank account number of your account held at another bank so that we can retrieve your transaction data from that account. If you hold a joint account, we also obtain all the information of the joint account holder. We only retrieve this information if you have given us your express permission.

### Contact history

We record when you have contacted us and what it concerned. We record telephone calls and keep a record of the content of chats so that we can improve our business operations, including the quality of service, training, coaching and staff appraisals. Using AI, we can automatically convert recordings of calls into text (speech to text) or summarise and analyse them for purposes described above. We may also communicate with you via the chatbots on our websites. We use a limited kind of AI (natural language processing) for this.

### Your visits to our websites and apps

We record information about your visits to our websites and apps, for instance, what pages you visited, what time you logged in to mijn.nn or what you searched for. This helps us to improve the functioning of the website and to give you a personal experience. We also use this information for marketing activities. One of the ways we do this is by placing cookies. There is more information on how we use cookies in our cookie statement. We also process your IP address. This is the number that identifies your computer, tablet or mobile phone on the internet, so that other computers, tablets and mobile phones can 'see' you.

## From whom do we get your personal data?

We get most of your personal data from you yourself or your financial adviser. If your employer has taken our insurance for you from Nationale-Nederlanden, for instance a pension or income protection insurance, we get your data from your employer or sometimes via the Persons Database. We may also get information from other banks and insurance companies if we need it for the execution of a contract. We may get information about your health from your employer (when reporting sick), your GP (with your permission) or the Employee Insurance Agency (UWV).

When assessing an application for a banking or non-life insurance product or handling a claim, we also consult various sources such as the National Mortgage Guarantee Scheme, the Credit Registration Office, the chamber of commerce, fraud registers and the Central Information System Foundation. The Central Information System is the central system for insurance companies in the Netherlands. The Central Information System Foundation manages this system. The system is intended to control risks and combat insurance crime. We may record your personal data in the CIS, for instance if you have committed fraud. We can also retrieve information about you from the CIS, for instance when assessing an application or a claim. We only do so under strict conditions. More information about the Central Information System and the Central Information System Foundation's privacy regulations are available on the foundation's website: www.stichtingcis.nl.

For non-life insurance, we also use FRISS software, which uses various public records and other sources, such as credit reference agencies. This helps us to assess the risk of fraud, default and claims and to assess whether the application meets the acceptance rules. We have access to the External Reference Index for banking products. If the banking product is a mortgage, the external register of the Anti-Mortgage Fraud Foundation is consulted.

If you are a customer of our authorised agent, Nationale-Nederlanden Verzekeren Services B.V., Nationale- Nederlanden Schadeverzekering Maatschappij N.V. will be given your personal data as well. If you are a customer of another organisation that takes out products on our behalf, i.e. an authorised underwriting agent, we will be given your personal data so that we can comply with our legal obligations.

We use public records and data from external agencies to validate and improve our data and to gain even better insight into our customers and services. We process personal data that we get from third parties if it that party is permitted to disclose it. We do not use this personal data for purposes other than for which it was obtained.

## With whom may we share your personal data?

We may disclose your personal data to the persons, companies and institutions listed below. We only do so if:
- it is necessary for the execution of the contract;
- we have a 'legitimate interest' in it, and the provision of your data is necessary for this reason. This is explained in the section entitled 'For what purposes do we process your personal data?';
- disclosing your data is required by law;
- you have given us your permission.

We will only disclose your information to the organisations listed below based on one of the grounds mentioned above.
- NN Group N.V., insofar as this is necessary for business operations, such as for legal advice and assistance and for compliance with legal obligations.
- Sparklab B.V. (trading as NN Sparklab and Nationale-Nederlanden Sparklab) and NN Zakelijke Diensten B.V. to advertise promotions by email or via other digital channels.
- Companies to whom we outsource work, i.e. processors. These companies then work on our orders, such as when processing identity checks.
- Your adviser or representative, your employer and its adviser, if you are insured via your employer.
- Medical advisers and occupational consultants.
- Companies that we engage to settle claims by providing loss adjustment services or recovery or consultancy work for non-life and income protection insurance.
- Companies that we engage to assess applications for a product or a claim notification.
- Companies that we engage to provide services to you.
- Public services, such as supervisory authorities, the police and judicial authorities and the tax and customs authorities, if we are required to do so by law and to the Kifid if you file a complaint and Banking Ethics Enforcement if we have to provide data in the context of a disciplinary case.
- Other financial institutions used in the payment system, such as Swift, Mastercard, Currence iDeal and SurePay, and to payment initiation service providers and providers of account information services.
- Other banks, insurance companies and pension providers. This includes reinsurance companies and legal expenses insurers.
- Bailiffs, debt collection agencies and/or civil-law notaries and credit reference agencies, such as EDR Credit Services and Focum. Information concerning the processing of personal data by EDR can be found in EDR's privacy statement: https://www.edrcreditservices.nl/privacy-statement/. There you can also find information on how to exercise your data subject access rights at EDR. Information concerning the processing of personal data by Focum can be found in Forum's privacy statement: https://www.focum.nl/privacyverklaring-focum-uitgebreid. There you can also find information on how to exercise your data subject access rights at Focum.
- External registers such as the CIS, the Credit Registration Office, the National Mortgage Guarantee Scheme, the External Reference Index and the Anti-Mortgage-Fraud Foundation. A check may be carried out using a reference application to see whether personal and other information is included in these registers. The Central Information System Foundation manages the insurance companies' reference application and the Credit Registration Office, and the Foundation for Combatting Mortgage Fraud manage the reference applications of other members.
- The Employee Insurance Agency [Uitvoeringsinstituut Werknemersverzekeringen (UWV).

## Automated decision-making

For some products, such as car insurance or life insurance, we assess the application and/or a claim through an automated process. In doing so, we may also use Artificial Intelligence (AI). In the application process, we check whether you meet our acceptance criteria. We consider, among other things, whether the information you have provided about yourself or the object you want to insure is correct. In the case of a claim, we verify whether the claim meets the policy conditions we have agreed with you and whether you are entitled to a payout based on the information you have provided.

We also check a number of fraud indicators for applications and claims, and based on your data and data from other (public) sources, we make a risk assessment. These checks may affect the amount of your premium for insurance products or the interest rate for banking products. In the case of a fraud registration, one of our employees will always assess your application.

When we check whether you are still entitled to a periodic payout and verify your identity to comply with legal requirements, the identity check is partially an automated process. In doing so, we may also use AI to verify your passport photo and the photo you have taken of yourself (selfie). In the event of an error between the selfie and your passport photo, one of our employees will always assess your application.

If we use an automated process, you have the right to have a decision reviewed by an employee, to receive an explanation, to let us know what you think, and to potentially object.

## This is how we look after your personal data

### We make sure we have proper security

We spend a lot of time and effort on the security of our systems and the personal data stored in them. Each business unit also has a special team that monitors security and how personal data is used. We keep an eye on the security of our data traffic. We immediately take action should anything go amiss. We address and record data breaches, which we are obliged to do by law. We inform the supervisory authority and you, if need be.

### The way we process personal data is monitored.

- The Dutch Data Protection Authority (Autoriteit Persoonsgegevens) monitors whether we comply with the GDPR.
- The Netherlands Authority for Consumers & Markets oversees how we deal with cookies, direct marketing via email and telemarketing.
- De Nederlandsche Bank, the European Central Bank and the Dutch Authority for the Financial Markets supervise the financial sector in general, including Nationale-Nederlanden.
- We have a data protection officer who monitors the way we handle your personal data. The data protection officer for life assurance and pension products can be reached via DPO-leven@nn.nl. The data protection officer for non-life and income protection products can be reached via fg-schade@nn.nl and for banking products via fg-bank@nn.nl.

### We have signed a confidentiality statement

All our employees have signed a statement of confidentiality and sworn an oath. We handle information that you entrust to us with due care; only authorised personnel may access and process your data.

## What are your rights?

As a customer, you have several rights concerning your personal data, which we explain below.

### You have right of access

This means that you can request the personal data that we have recorded and ask what we use it for.

### You have right of rectification, erasure and restriction

You are entitled to have your personal data rectified if it is not correct. You are also entitled to have your personal data deleted if your personal data is unlawfully processed, is no longer necessary for the purpose for which it is processed, or because you have withdrawn your consent and Nationale-Nederlanden no longer has any other legal grounds for processing your data. You also have the right to restriction of your personal data. This right means that you can tell us to stop using your information temporarily. You may exercise this right if your personal data is incorrect, unlawfully processed, no longer necessary for the purpose for which it has been collected or processed, or if you object to the processing of your data and we are still dealing with your objection.

### You have the right to data portability
This means that you are entitled in certain cases to ask us to take the personal data that you provided, and transfer it to you and/or another service provider.

### You have right to object
You are entitled to lodge an objection to the processing of your personal data if we use your personal data for purposes other than those necessary for executing a contract or for complying with legal obligations. We will take your objection seriously and stop processing your personal data if that is necessary.

### Setting your preferences for promotions
You can easily change the settings for receiving promotional emails. All you have to do is click the link at the bottom of the email or call us to let us know.

## How long do we keep your data?

We keep your data for as long as we are required to do so by law and as long as necessary for the purpose for which we use the data. This may vary depending on the product, based on the following rules:

### Do you have term life insurance, life assurance or pension insurance policy?
We keep your data for as long as you are a customer. We retain the data for a while after you no longer have one of our products. If that is the case, we observe the seven-year statutory retention period. After that, we only keep the data for statistical purposes and for handling complaints and for lawsuits. In that case, we keep the data in a closed file.

### Do you have general insurance, such as vehicle insurance or household contents insurance? Or income protection insurance, like occupational disability insurance?
We keep your data for as long as you are a customer. This also applies if you are not a customer, but we have to process your personal data to settle a claim, for instance. We remove the policy details in principle seven years after the contract has ended. We remove the information about the claim in principle seven years after the contract has ended. If it involves personal injury, we keep the data in principle for twenty years after the claim is settled. After the retention period, we only keep the data required for statistical purposes

### Do you have a mortgage loan, consumer loan, bank savings or savings product or investment product?
We keep your data for as long as you are a customer. In principle, we remove your data seven years after your contract has ended. For data that we only process for identification and verification, we will delete it five years after the termination of your agreement. After the retention period, we only store necessary data for statistical purposes

### Do you have a health insurance policy or supplementary health insurance?
We have placed your health insurance and supplementary health insurance with health insurer Centrale Ziektekostenverzekeringen NZV N.V., or O.W.M. CZ Groep U.A., both of which are part of the CZ Group. We keep your information as long as you are insured with us. In principle, we remove your data seven years after your contract has ended. If you would like to know which personal data CZ has about you, please contact CZ via cz.nl/privacy.

## Where do we process your data?

Your data is normally processed within the European Union (EEA). Personal data is processed in non-EU countries in some cases. Some of our suppliers and business partners are also based in non-EU countries or provide these services outside the EU. The regulations in those countries do not always provide the same level of personal data protection as European regulations. To ensure that your personal data is in any event safe, we take measures in these cases by entering into contracts where we make similar arrangements about the security of personal data, just like we do within the EU. These are called EU model contracts.

## To which companies does this privacy statement apply?

You're probably only familiar with the name Nationale-Nederlanden, because we trade under this brand name. This includes the following companies. These companies are all part of NN Group N.V. This privacy statement applies to the following companies. These companies work together and share information among themselves and with NN Group N.V. as well as Sparklab B.V. (trading as NN Sparklab and Nationale-Nederlanden Sparklab) and NN Zakelijke Diensten B.V. These companies may send you promotions and offers because you are a customer of ours.

- Nationale-Nederlanden Levensverzekering Maatschappij N.V.
- Nationale-Nederlanden Schadeverzekering Maatschappij N.V.
- Nationale-Nederlanden Bank N.V.
- Distributie Zorgverzekeringen B.V. (trading as Nationale-Nederlanden Zorg)

## Any questions?

If you have any general questions about your personal data, then please contact our customer services department.

## Would you like to access your personal data or change it?

To access or change your personal data, click on mijn.nn, your personal online environment, where you can access and change your primary personal data, such as your home address or email address. You can also retrieve more details at mijn.nn and exercise your other rights, such as the right to data portability. If you haven't yet registered with mijn.nn, Then go to nn.nl/account, where you can create an account, or contact our customer service department.

## Are you a customer via ING Verzekeren?

If you have an insurance policy with ING Verzekeren and have questions about your personal data or would like to exercise your rights as a customer, then please contact ING Verzekeren (part of Nationale-Nederlanden) at +31 (0)20 22 888 88, on weekdays from 8:30 a.m. to 7 p.m. and on Saturdays from 10 a.m. to 4 p.m. If you have any questions about your personal data or would like to exercise your rights as an ING Bank customer, please visit ing.nl/privacy.

## Do you have insurance via ASN Bank?

Do you have insurance through ASN Bank and have questions about your personal data or want to exercise your data subject rights? Then contact Nationale-Nederlanden at 088 663 06 63 (Mon to Fri from 9:00 AM to 5:00 PM).

Do you have questions about your personal data or want to exercise your data subject rights as an ASN Bank customer? Then go to asn.nl/privacy.

## Do you have any questions about your health insurance and supplementary health insurance?

We have placed your health insurance and supplementary health insurance with health insurer Centrale Ziektekostenverzekeringen NZV N.V., or O.W.M. CZ Groep U.A., both of which are part of the CZ Group. Nationale-Nederlanden Zorg only keeps data that is necessary for acting as your intermediary and providing services, for instance, your name, address and age. For more information about this, call us on +31 (0)26 353 53 53. We do not have access to your medical records or payment details. If you would like to know which personal data CZ has about you, please contact CZ by clicking on cz.nl/privacy.

## Complaints

If you have a complaint about the way Nationale-Nederlanden handles your personal data, you can lodge it via the Lodging a complaint page. You can also file a complaint with the Dutch Data Protection Authority.

If you have filed a complaint with us and are you not satisfied with our response, please contact the Dutch Institute for Financial Disputes(Kifid), Postbus 93257, 2509 AG, Den Haag. You can also reach them on +31 (0)70 333 89 99 or contact them via www.kifid.nl.

## About this privacy statement

This privacy statement may be amended in line with changes in the laws and regulations and/or if we change the way we process personal data. This version was last updated on 17 September 2026. The most recent version is always available on nn.nl/privacy-statement.

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