

# INI Data Privacy Policy

## 1 INTRODUCTION

The International Network of Insurance asbl (INI asbl) is a non-profit organisation incorporated at 37 Boulevard du Roi Albert II, 1030 Brussels, Belgium, which offers an infrastructure that enables its Members to conduct

This policy describes how the INI asbl (acting as a data controller) collects, uses, shares and retains the personal information provided by Data Subjects. It informs Data Subjects about their choices regarding use, access and correction of their personal information.

The INI asbl is committed to ensuring that any personal data it receives is protected and handled in accordance with applicable data protection laws.

## 2 WHAT PERSONAL INFORMATION IS PROCESSED ABOUT THE DATA SUBJECT?

The personal information held by the INI asbl is limited to the Data Subject's name, job title, business and email addresses, fax and phone numbers, employer's name as well as country of residence.

The INI asbl keeps a record of the Data Subject's communication data in INIconnect.

## 3 WHY INI ASBL COLLECTS PERSONAL INFORMATION AND WHAT IS THE LAWFUL BASIS FOR PROCESSING?

- **Business Communication and reporting:** Personal business information is processed in order to ensure clear business communication and to enhance the service quality. The INI asbl may contact Data Subjects with additional business communication. The lawful basis for this process is legal obligation.
- **Information:** The INI asbl provides Data Subjects with information regarding market regulatory developments and INI Member information. The lawful basis for this process is legal obligation.
- **Event management:** Personal Data Subject details are processed in order to support the communication and management of INI events. The lawful basis which allows INI asbl to process personal data is legitimate interest.
- **IT Services:** Personal Data Subject details are used to manage and improve the INI asbl IT services. The lawful basis for this process is legal obligation.
- **Training:** Information regarding training courses is sent to Data Subjects periodically. The lawful basis which allows INI asbl to process personal data is legitimate interest.

It is in the legitimate interest of the INI asbl to carry out training sessions, seminars, conferences and workshops for the benefit of its Members as well as any other individuals. It is also a legitimate interest of the INI asbl to inform Members and individuals about offers and services.

## 4 WHO IS THE LEGAL OWNER OF THE DATA?

The INI asbl holds no proprietary rights to any personal data registered in INIconnect. The respective INI Member Companies remain the sole owners and retain full responsibility for data entered. This includes all responsibilities relating to personal data as stipulated in the GDPR, such as the right to access, rectify, erase, return or transfer data including the right to restrict or withdraw consent for data processing.

## 5 WHAT ARE THE RESPONSIBILITIES OF THE DATA OWNER?

Requests to exercise these rights are to be submitted to the INI asbl (Network Office) in writing by the INI Coordinator (s) or any other authorized person(s) within the Member Company owning the data.

INI Coordinators or any other authorized persons within the Member Companies are also responsible for granting or cancelling INIconnect access of employees within their organisations. Each new INIconnect user is

required to acknowledge the “INI Non-Disclosure & Data Protection Agreement for INIconnect Users” when accessing INIconnect for the first time.

It is also the responsibility of the INI Coordinators or any other authorized persons within the Member Companies to inform the INI Network Office of any Data Subjects no longer requiring access to INIconnect in order to ensure that these rights are withdrawn immediately.

## 6 WHO IS THE INI ASBL SHARING THE DATA WITH?

The INI asbl may share personal data with the following third parties for the purposes described in this Privacy Policy:

- INI Member Companies required to deliver the services requested by Data Subjects;
- Trusted service providers the INI asbl uses to run and maintain business;
- Legal and other professional advisers, courts of law and any other law enforcement bodies, in order to enforce the legal rights of the INI asbl in relation to its contract with Data Subjects;
- Data Subjects may be able to access third party social media services through the INI asbl website or app or before coming to the INI asbl website or app. When Data Subjects are registered with their social media account, INI asbl will obtain the personal information Data Subjects have agreed to share with the INI asbl through these social media services pursuant to their privacy settings in order to improve and personalize the Data Subjects use of the INI asbl website or app. The INI asbl may also use social media plugins on INI asbl’s website or app. As a result the Data Subject’s information will be shared with social media providers and possibly presented on the Data Subject’s social media profile to be shared with others in their network. Please refer to the privacy policy of these third-party social media providers to find out more about these practices.
- Event organisation: Data Subject data will only be shared with organisers, hotels or event management companies or any other service providers that are involved in the event.

## 7 HOW LONG IS DATA KEPT?

The INI asbl will retain personal data for as long as is reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy. The retention period will primarily be determined by relevant legal and regulatory obligations and/or duration of the business relationship with Data Subjects, Data Subject’s employer or any another associated party. The INI asbl regularly maintains and updates its data retention policy. The INI asbl will securely delete or erase personal information if there is no valid business reason for retaining this data. In exceptional circumstances, the INI asbl may retain personal information for longer periods in the event of potential litigation, complaints or there is another valid business reason the data may be required for.

## 8 INTERNATIONAL TRANSFERS

The INI asbl may transfer or share Data Subject data outside of the European Union/European Economic Area for business purposes. Data may also be processed by individuals operating outside of the EU/EEA.

The INI asbl will at all times take the necessary steps to ensure Data Subject’s data is treated and transferred securely subject to appropriate safeguards and controls.

## 9 WHAT ARE THE DATA SUBJECT’S RIGHTS?

Data Subjects have the following rights as an individual which they can exercise in relation to the information INI asbl holds about Data Subjects:

### a. The right to access

A Data Subject is entitled to obtain information relating to the

- processing of their personal data, and a copy of such personal data;
- recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations.

Where the personal data are not collected from the data subject, the Data Subject is entitled to obtain any available information as to their source of origin.

**b. The right to rectification**

A Data Subject has the right to request rectification of personal data in cases where the data is inaccurate or incomplete.

**c. The right to erasure**

Data Subjects have the right to request the deletion of their personal data, to the extent permitted by law. Unless in the event of potential litigation, complaints or if the data may be required for business purposes.

However, this will need to be balanced against other factors, for example there may be certain regulatory obligations which mean the INI asbl cannot comply with the Data Subject's request.

**d. The right to restrict processing**

Data Subjects can ask the INI asbl to restrict (i.e. keep but not use) the processing of personal data, but only where:

- Its accuracy is contested, to allow INI asbl to verify its accuracy; or
- Unlawful processing has taken place;
- It is no longer needed for the purposes for which it was collected; but the INI asbl or the INI Members still need it to establish, exercise or defend legal claims; or
- Data Subjects have exercised their right to object and verification of overriding grounds is pending.

**e. The right to data portability**

Where legally applicable, Data Subjects have the right to have their personal data (provided to the INI asbl or INI Members) returned to them or, where technically feasible, transferred to a third party.

**f. The right to withdraw consent**

Data Subjects have the right to withdraw consent previously provided for the processing of personal data.

The INI asbl may continue to process Data Subject's personal data following a request for restriction, only in cases where the INI asbl or one of its INI Members have obtained the Data Subject's consent to establish, exercise or defend legal claims, or to protect the rights of another natural or legal person.

The INI asbl retains the right to request proof of identity upon the Data Subject's request on the above-mentioned rights. All Data Subject's requests will be addressed within one month from the date of request.

## 10 DATA SECURITY

The INI asbl has implemented and maintains appropriate technical and organizational security measures to protect personal data from unauthorized access, alteration, disclosure, loss or destruction.

## 11 WHAT WILL HAPPEN IN THE EVENT OF A DATA BREACH?

Should a data breach occur, the INI asbl will inform the INI Coordinator and INI Top Manager (as listed in the INI Who's Who directory) in writing immediately after becoming aware of the breach. It is the responsibility of the INI Coordinator to inform the INI Network Office of any other authorized persons to be included in the data breach notification.

Relevant authorities will be informed by the respective INI Member, or by the INI asbl where legally required.

## 12 DATA PRIVACY POLICY AMENDMENTS

We reserve the right to make modifications to our security and data protection measures, insofar as this is necessary due to the technical development. In these cases, we will also adapt our data protection policy accordingly. The latest version of this policy is available on the INI asbl websites.

### 13 CONTACT THE INI ASBL

Data Subjects are invited to exercise their personal data rights (§ 9), ask any questions relating to data protection or submit complaints regarding the processing of personal data by contacting:

**International Network of Insurance asbl**

37 Boulevard du Roi Albert II

1030 Brussels

Belgium

Email: [privacy@inetwork.com](mailto:privacy@inetwork.com)