



Data Protection Policy

Schreiber Maron Sprenger AG | Vaduz

Valid from: 01.09.2023

Table of contents





1.	Version control	3
1.1.	Change control	3
1.2.	Approval	3
1.3.	Open points	3
2.	Data Protection Policy	4
2.1.	General	4
2.2.	Content and purpose	4
2.3.	Origin and categories of processed data	4
2.4.	Disclosure of data to third parties	4
2.5.	Duration of storage	5
2.6.	Principles for data protection	5
2.7.	Data protection management system	5
2.8.	Your rights as a data subject	5
2.9.	Contact	6
2.10.	Right to make changes	7

1. Version control

1.1. Change control

Date	Version	Name	Description
31.10.2018	1.0	Rolf Badat	Create
14.02.2019	2.0	Rolf Badat	Adaptation to current legislation (Amendment of the Data Protection Act and the Data Protection Ordinance as of 1 January 2019)
11.06.2020	2.1	Rolf Badat	Change to data protection contact
20.01.2023	3.0	Natascha van Berkum	Adaptation to current legislation (Amendment of the Data Protection Act and the Data Protection Ordinance as of 1 September 2023)

1.2. Approval

Date	Version	Name, position	Signature
31.10.2018	1.0	Jan Müller Managing Director	
14.02.2019	2.0	Jan Müller Managing Director	
11.06.2020	2.1	Jan Müller Managing Director	
20.01.2023	3.0	Jan Müller Managing Director	

1.3. Open points

Date	Name	Topic

2. Data Protection Policy

2.1. General

Schreiber Maron Sprenger AG is a provider of tailor-made insurance and risk solutions. It offers services in the field of occupational pension plans, personal, property and liability insurance, as well as risk management.

With this Data Protection Policy, Schreiber Maron Sprenger AG wishes to inform you that it complies with the applicable data protection regulations. The Data Protection Policy of Schreiber Maron Sprenger AG is based on the security and data protection guidelines of Schreiber Maron Sprenger AG.

2.2. Content and purpose

As an insurance broker, one of the tasks of Schreiber Maron Sprenger AG is to process (receive, save, modify, pass on, etc.) personal data (hereinafter referred to as "personal data" or "data") of customers, clients and employees. In order to be able to offer the customer tailored solutions and to maintain correspondence with them and the insurers, the processing of this data is essential.

Schreiber Maron Sprenger AG considers the protection of personal data to be an essential part of its service to the customer. Data protection is therefore one of the company's most important principles of conduct.

2.3. Origin and categories of processed data

The personal data processed by Schreiber Maron Sprenger AG comprises data disclosed by the policyholder, insurer, insured persons or authorised third parties as well as publicly accessible data. Data categories are:

- Customer data (e.g. name, address, date of birth, gender, nationality, credit rating data)
- Data from applications, including the associated supplementary questionnaires (e.g. information provided by the applicant about the insured risk, answers to questions, expert reports, information provided by the previous insurer about the claim experience to date)
- Data from contracts with insurers (e.g. contract duration, insured risks, benefits, data from existing contracts)
- Debt collection data (such as the date and amount of premiums received, outstanding amounts, reminders, credit balances, payment details) and
- Any claims data (e.g. damage reports, investigation reports, invoices, data relating to injured third parties)

No data is obtained from other third parties.

2.4. Disclosure of data to third parties

Schreiber Maron Sprenger AG handles data processing in connection with its activities as an insurance broker with the help of the Swiss companies UMB AG (IT outsourcing), IOZ AG (document management system), Brokinsoft SA (broker software), Powerfully GmbH (digital process optimisation), ELREC AG (document destruction), Triboni AG (document management system) and Microsoft365 (Outlook, Teams and SharePoint). Other data processing activities are carried out by Angela Casanova-Maron and Confida Treuhand AG (accounting) and Thöny Treuhand AG (audit). These have their registered office in Liechtenstein. Schreiber Maron Sprenger AG works closely with its parent company in Switzerland, Qualibroker AG. To enable this collaboration, individual employees are also granted authorisation to process the customer data of the respective company (restricted to individual persons in administrative tasks such as accounting, IT support or similar). Qualibroker AG also operates a customer portal. A separate user agreement is required between the customer and Qualibroker AG in order to use the customer portal.

The contractual partners for outsourced functions are carefully selected by Schreiber Maron Sprenger AG. Schreiber Maron Sprenger AG obliges the contractual partners to comply with data protection and monitors

them continuously. In this case, Schreiber Maron Sprenger AG remains responsible for compliance with data protection.

2.5. Duration of storage

Schreiber Maron Sprenger AG processes personal data for as long as it is necessary for the fulfilment of the aforementioned purposes. The statutory retention period of ten years generally applies to the storage of business documents (Art. 1059 para. 1 PGR). In addition, Schreiber Maron Sprenger AG stores data for the period during which claims may be asserted against Schreiber Maron Sprenger AG.

2.6. Principles for data protection

The following principles are followed in data processing by Schreiber Maron Sprenger AG:

- Proportionality is the basis of data processing at Schreiber Maron Sprenger AG. As a result, only data that is really necessary for the fulfilment of the task is stored and processed.
- Technically incorrect data is returned to the data supplier.
- Schreiber Maron Sprenger AG processes data exclusively for the purpose of fulfilling the contract and guarantees data security.
- The management of Schreiber Maron Sprenger AG bears overall responsibility for data protection, provides appropriate means for its fulfilment and is responsible for an appropriate review of data protection.
- All employees of Schreiber Maron Sprenger AG are aware of the importance of data and information and receive regular training.
- All employees of Schreiber Maron Sprenger AG are familiar with the statutory provisions and internal guidelines and act accordingly.
- All employees of Schreiber Maron Sprenger AG are obliged to optimise the effectiveness of data protection on an ongoing basis.
- Confidential and sensitive data is managed securely and protected against unauthorised access.
- All persons employed by or commissioned by Schreiber Maron Sprenger AG are obliged to maintain confidentiality and to comply with data protection in accordance with the guidelines and the contractual provisions.
- Schreiber Maron Sprenger AG handles data, information, processes and infrastructure responsibly.
- All employees of Schreiber Maron Sprenger AG are responsible in their respective roles for creating and maintaining the necessary and appropriate framework conditions for data protection and data security.

2.7. Data protection management system

Schreiber Maron Sprenger AG has the required quality management. All data processing is documented by them and is therefore traceable. Schreiber Maron Sprenger AG takes all appropriate and proportionate technical and organisational precautions to protect personal data against unauthorised access, manipulation, alteration, falsification, destruction or loss. This applies to all stages of data processing, from collection to destruction.

2.8. Your rights as a data subject

If you can be identified as a natural person based on the data stored by the Schreiber Maron Sprenger AG, you are a data subject. Schreiber Maron Sprenger AG processes personal data on the one hand as a processor of customer data and on the other hand as a controller for the processing of data of partners, employees and suppliers. In the first case, the customer is the controller. The rights of data subjects listed here must be asserted against the respective controller.

Information obligation when collecting personal data:

Schreiber Maron Sprenger AG is obliged to inform its customers about the collection of personal data where it acts as the controller for data processing.

Right to information:

You have the right to obtain information about your personal data processed by the controller and the purpose of processing this data. You can send your request for information to the controller in writing together with a copy of your identity card or passport at the contact address of the controller. In the case of particularly complex applications, a cost contribution of up to a maximum of CHF 300.00 may be required.

Right of access and rectification:

You have the right to see your personal data processed by the controller. If incorrect information is stored about you despite efforts to ensure that your data is accurate and up to date, it will be corrected at your request. You will be informed of this once the correction has been made.

Right to deletion:

If the controller is not obliged or entitled to retain some of your personal data under applicable laws and regulations, you have the right to have your data deleted from the controller's system.

Right to restriction of processing:

Under certain circumstances, you have the right to request that the controller restrict processing.

Notification obligation in connection with rectification or erasure of personal data or restriction of processing:

Schreiber Maron Sprenger AG notifies all recipients to whom personal data has been disclosed of any rectification or erasure of personal data or restriction of processing, unless this proves impossible or involves disproportionate effort. The Schreiber Maron Sprenger AG shall inform the data subject about these recipients if the data subject requests so.

Right to data portability:

You have the right to receive the personal data concerning you which you have provided to a controller and to transmit it to another controller without hindrance from the controller to which you have provided the data.

Right to object:

If the processing of your data is not absolutely necessary for the fulfilment of the contract or if the controller is not obliged or entitled to process your data on the basis of applicable laws and regulations, you may object to such processing at any time with effect for the future.

Right to withdraw consent:

Any consent to data processing granted to the scribe Maron Sprenger AG may be revoked. Revocation is as easy as granting consent.

Right to lodge a complaint:

In the event of a violation of your rights, you have the opportunity to lodge a complaint with the competent data protection authority.

2.9. Contact

The **internal** officer responsible for data protection issues and contact for questions is:

Jan Müller
Managing Director

Schreiber Maron Sprenger AG
Holy Cross 42
9490 Vaduz, Liechtenstein

Tel. +423 237 57 77

E-mail j.mueller@schreibermaronsprenger.li

2.10. Right to make changes

Schreiber Maron Sprenger AG reserves the right to adapt this Data Protection Policy to the current legal provisions at any time. The version published at www.schreibermaronsprenger.li/datenschutz applies.