



# Data Protection Policy

## Qualibroker AG

Valid from: 02.12.2025

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For the sake of readability, gender-specific differentiation is not used throughout the document. All references to persons apply to all genders in the interests of equal treatment.

## 1. Version control

### 1.1. Change control

Date	Version	Name	Description
31.10.2018	1.0	Rolf Badat	Create
21.06.2019	2.0	Rolf Badat	Amendment of the rights of data subjects
11.06.2020	2.1	Rolf Badat	Change to data protection contact
01.09.2023	3.0	Natascha van Berkum	Adaptation to current legislation (Change FADP / GDPR as of 1 September 2023)
02.12.2025	4.0	Altea D'Agostini	Adjustment of the document 'Data Processing Policy (Chapter 2: Information System Structure)' as well as the document 'Outsourcing Partners and Suppliers'.

### 1.2. Approval

Date	Version	Name, position	Signature
31.10.2018	1.0	Urs Thalmann Managing Director	
21.06.2019	2.0	Urs Thalmann Managing Director	
11.06.2020	2.1	Urs Thalmann Managing Director	
01.09.2023	3.0	Urs Thalmann Managing Director	
02.12.2025	4.0	Urs Thalmann Managing Director	

### 1.3. Open points

Date	Name	Topic

## **2. Data Protection Policy**

### **2.1. General**

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

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

### **2.2. Content and purpose**

As an insurance broker, Qualibroker AG's duties also include processing (receiving, storing, changing, passing 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.

Qualibroker 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 Qualibroker AG comprises publicly accessible data disclosed by the policyholder, insurer, insured persons or authorised third parties. 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**

Qualibroker AG processes data in connection with its activities as an insurance broker with the help of the Swiss companies UMB AG (outsourcing IT), Brokinsoft SA (broker software), Powerfully GmbH (digital process optimisation), Datarec AG (data destruction), Treureva AG (HR management), Syspart AG and Triboni AG (document management system), Microsoft 365 (Outlook, Teams and Sharepoint) and Promacx AG (web hosting). Other data processing activities will be carried out by BDO AG (financial statements), TBO Treuhand AG (payroll accounting), Qualibroker Romandie SA and Swiss Risk & Care SA (accounting) and Fiduciaire FIDAG SA (audit). Thanks to the close cooperation with the subsidiary in Liechtenstein, Schreiber Maron Sprenger AG, Qualibroker Oberwallis AG and Qualibroker Ticino SA, their personal data is processed by Qualibroker AG.

The contractual partners for outsourced functions shall be selected carefully by Qualibroker AG. Qualibroker AG obliges the contractual partners to comply with data protection and monitors them on an ongoing basis. Qualibroker AG remains responsible for compliance with data protection in this case.

## 2.5. Duration of storage

Qualibroker AG processes personal data for as long as this 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. 958f para. 1 CO). Qualibroker AG also stores data for the period in which claims can be asserted against Qualibroker AG.

## 2.6. Principles for data protection

The following principles are followed in data processing by Qualibroker AG:

- Proportionality is the basis of data processing at Qualibroker 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.
- Qualibroker AG processes data exclusively for the purpose of contractual fulfilment and guarantees data security.
- The Executive Board of Qualibroker 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 Qualibroker AG are aware of the importance of data and information and receive regular training.
- All employees of Qualibroker AG are familiar with the statutory provisions and internal guidelines and act accordingly.
- All employees of Qualibroker 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 Qualibroker AG are obliged to maintain confidentiality and to comply with data protection in accordance with guidelines and the contractual provisions.
- Qualibroker AG handles data, information, processes and infrastructure responsibly.
- All employees of Qualibroker 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

Qualibroker AG has the required quality management. All data processing is documented by them and is therefore traceable. Qualibroker AG takes all technical and organisational precautions which are suitable and proportionate to protect personal data against unauthorised access, manipulation, modification, 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 on the basis of the data stored by Qualibroker AG, you are a data subject. Qualibroker AG processes personal data on the one hand as a processor of customer data and on the other 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:**

Qualibroker 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 with a copy of your identity card or passport to 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 which is 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 deletion of personal data or restriction of processing:**

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

### **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 that has been granted to Qualibroker 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:

Urs Thalmann  
Managing Director

Qualibroker AG | Baslerstrasse 52 | 8048 Zurich, Switzerland

Phone +41 43 311 21 51

E-mail [urs.thalmann@qualibroker.ch](mailto:urs.thalmann@qualibroker.ch)

## 2.10. Right to make changes

Qualibroker AG reserves the right to adapt this data protection policy to the current statutory provisions at any time. The version published at [www.qualibroker.ch/datenschutz](http://www.qualibroker.ch/datenschutz) applies.