



# Data Processing Policy

Qualibroker AG |

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# Table of contents

1.	General provisions	4
1.1.	Legal basis	4
1.2.	Aim of the Data Processing Policy	4
1.3.	Purpose of data processing	4
1.4.	Responsible data protection office	4
2.	Information system structure	5
2.1.	Printers, office supplies and postal delivery	5
2.2.	Components of the information system	5
2.2.1.	<i>Corporate management</i>	5
2.2.2.	<i>E-mail, Internet/intranet and telephone</i>	5
2.2.3.	<i>HR management</i>	5
2.2.4.	<i>Document management</i>	5
2.2.5.	<i>IT operations</i>	5
2.2.6.	<i>Cookies</i>	5
2.3.	Interfaces	6
3.	Entities involved	8
3.1.	Organisational areas of Qualibroker AG	8
4.	User and data access	9
4.1.	Users	9
4.2.	User management	9
4.3.	Cancellation of access authorisation	9
4.4.	User training	9
4.5.	Instruction/directives	9
4.6.	Processes	9
5.	Data processing/data categories	10
5.1.	Data origin	10
5.2.	Categories of processed data	10
5.3.	Registration of data collection with the FDPIC	10
6.	Data archiving	11
6.1.	Archiving obligation	11
6.2.	Retention period and deletion	11
7.	Technical and organisational measures	12
7.1.	Access control	12
7.2.	Data carrier control	12
7.3.	Transport control	12
7.4.	Disclosure control	12
7.5.	Memory control	12
7.6.	Access control	12
7.7.	Input control	13
7.8.	Measures in the area of end devices	13

- 7.9. Separation of test and production servers \_\_\_\_\_ 13
- 7.10. Data security breaches \_\_\_\_\_ 14
- 7.11. Working from home \_\_\_\_\_ 14
  
- 8. Rights of data subjects \_\_\_\_\_ 15**
- 8.1. Information obligation when collecting personal data \_\_\_\_\_ 15
- 8.2. Right to information \_\_\_\_\_ 15
- 8.3. Right of access and right to rectification \_\_\_\_\_ 15
- 8.4. Right to deletion \_\_\_\_\_ 15
- 8.5. Right to restriction of processing \_\_\_\_\_ 15
- 8.6. Notification obligation in connection with rectification or deletion of personal data or restriction of processing \_\_\_\_\_ 15
- 8.7. Right to data portability \_\_\_\_\_ 15
- 8.8. Right to object \_\_\_\_\_ 15
- 8.9. Right to withdraw consent \_\_\_\_\_ 16
- 8.10. Right to lodge a complaint \_\_\_\_\_ 16
  
- 9. Final provisions \_\_\_\_\_ 17**
- 9.1. Amendments to the Policy \_\_\_\_\_ 17
- 9.2. Approval \_\_\_\_\_ 17

## 1. General provisions

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.

### 1.1. Legal basis

This Data Processing Policy has been drawn up on the basis of the following laws and ordinances:

- The European Union's General Data Protection Regulation (GDPR) of 27 April 2016 (version dated 4 May 2016)
- Data Protection Act (DSG) of 25 September 2020 (version dated 1 September 2023)
- Data Protection Ordinance (DPO) of 31 August 2022 (version dated 1 September 2023)
- Swiss Code of Obligations (CO) of 30 March 1911 (as at 1 April 2017)

### 1.2. Aim of the Data Processing Policy

The Data Processing Policy ensures that the personal and fundamental rights of persons whose personal data is processed at Qualibroker AG are protected in accordance with the statutory provisions. The Data Processing Policy describes in particular the data processing and control procedure and mentions which documents exist concerning the planning, implementation and operation of the data collection.

### 1.3. Purpose of data processing

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. In order to be able to offer the customer tailored solutions and maintain correspondence with the customer and the insurers, the processing of customer data is essential for order fulfilment.

### 1.4. Responsible data protection office

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. Information system structure

### 2.1. Printers, office supplies and postal delivery

The printers are provided and maintained by Witzig The Office Company AG, CH-8500 Frauenfeld and Axius Services AG, CH-1950 Sion. Office supplies are obtained from Ofrex AG, CH8152 Glattbrugg. Oberhänkli Kurier AG, CH-8604 Volketswil is responsible for dispatch by post.

### 2.2. Components of the information system

#### 2.2.1. Corporate management

Overall responsibility for data protection lies with the Executive Board. This responsibility is not transferable.

#### 2.2.2. E-mail, Internet/intranet and telephone

Internet access for business purposes is configured for all customers. An individual e-mail account and a direct line are set up for each employee. The transitions from the internal to the external network are protected by a firewall. Only selected Qualibroker AG employees registered at UMB AG, CH-6330 Cham, can access the Qualibroker AG system externally using a code.

Private use of the infrastructure/e-mails is tolerated to a limited extent and must be done outside working hours or during breaks.

#### 2.2.3. HR management

The application tool of Ostendis AG, CH-5706 Boniswil is used for the recruitment process. If required, Impulse-Group GmbH, CH-8008 Zurich is involved in the hiring of employees.

#### 2.2.4. Document management

The data and documents are stored centrally on the servers of UMB AG and Silicom SA as well as at Microsoft and are accessed via PowerApp (Brokers) and Office 365. Access permissions to specific data and documents are granted based on an employee's function and role.

#### 2.2.5. IT operations

The IT area is ensured by the outsourcing partners UMB AG and Silicom SA and supported within our group by Qualibroker Swiss Risk & Care SA. These two manage the servers on which the applications, data, and documents of Qualibroker AG are stored, as well as the Microsoft accounts for each employee. The insurance broker software is provided and maintained by Brokinsoft SA, located in CH-1950 Sion. The Microsoft Power Platform applications are managed and developed by Powerfully GmbH, 8307 Ilnau-Effretikon. Triboni AG, CH-8005 Zürich provides its scanning software.

These partners confirm compliance with data protection regulations for themselves and their employees by signing the contract. Employees can access the data on the servers of UMB AG / Silicom SA via their computer (client) as needed to perform their tasks. All data is regularly backed up and archived by UMB AG / Silicom SA.

Both the firewall and antivirus program must be regularly checked and kept up to date by UMB AG / Silicom SA. Additionally, Qualibroker AG operates a customer portal. Use of the customer portal requires a separate user agreement between the customer and Qualibroker AG.

The website was developed by Agence SPRITZ, 59700 Marcq-en-Baroeul, France.

#### 2.2.6. Cookies

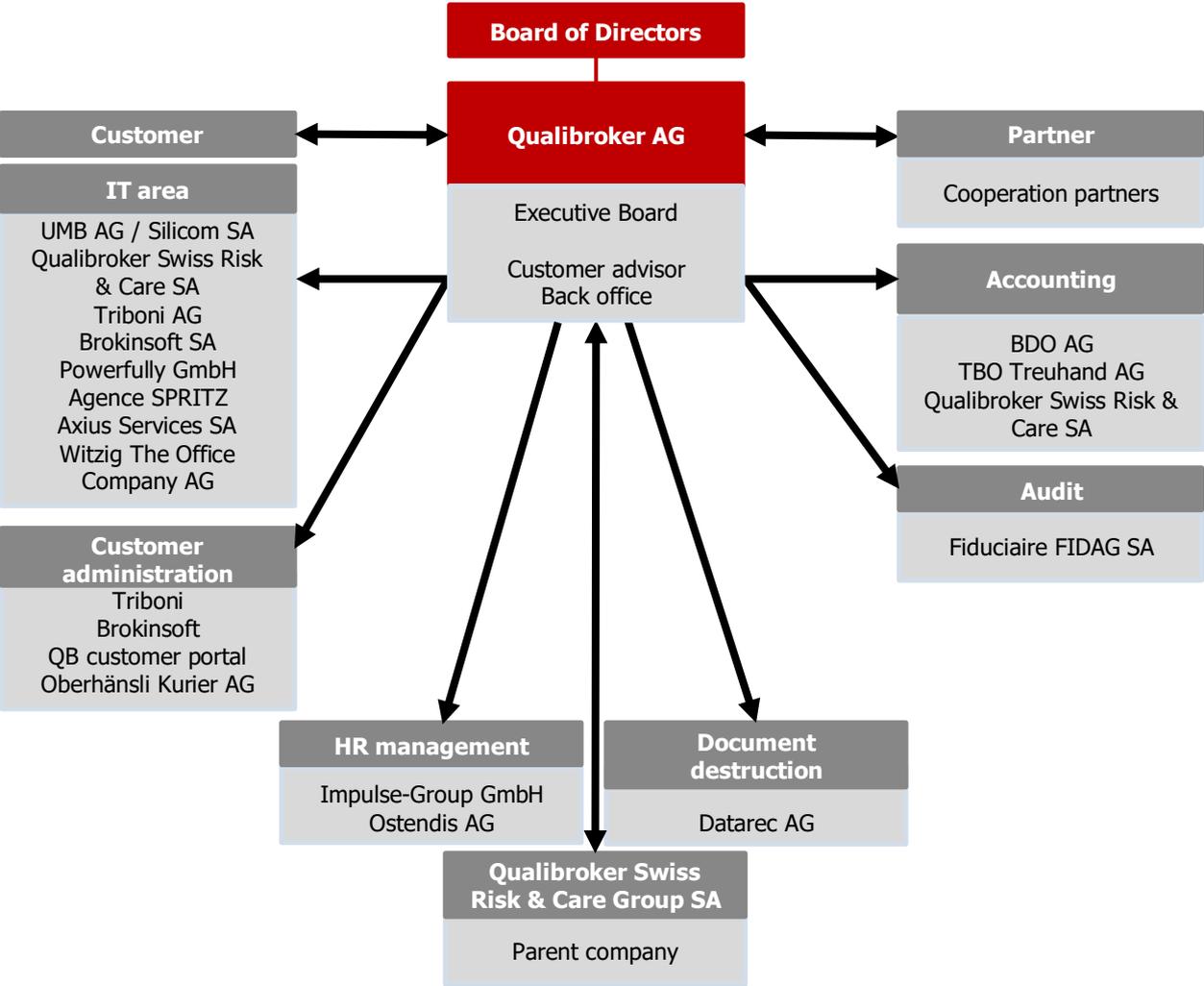
Our website uses cookies and similar technologies to analyze site usage, personalize content, and optimize marketing activities. The current list of cookies in use can be accessed at <https://www.swissriskcare.ch/politique-cookies/>. Among the most important cookies are those required for the operation of WordPress.

Note on marketing activities:

We also run targeted advertising on external platforms such as LinkedIn that link to our website. When visiting our website and interacting with our ads, additional tracking technologies from LinkedIn may be used.

### 2.3. Interfaces

The diagram below shows the data and document interfaces of Qualibroker AG to the outside world. A list of interfaces and an overview of suppliers and outsourcing relationships are maintained internally.



The personal data processed by Qualibroker AG in the context of its activity as an insurance broker comprises publicly accessible data disclosed by the policyholder, insurer and insured party. As part of its duties as an employer, Qualibroker AG processes personal data that it obtains from employees, applicants and Impulse-Group GmbH, which may be commissioned with HR management tasks.

In order to obtain quotes for customers and take out insurance, it is necessary for customer data to be forwarded to the insurance partners of Qualibroker AG for order fulfilment.

The IT area has been outsourced to UMB AG / Silicom SA. During their activities, Triboni AG, Office365, Brokinsoft SA (CH-1950 Sion), and Powerfully GmbH (CH-8307 Effretikon) have access to electronically recorded customer and employee data via the Qualibroker customer portal.

Payroll processing is handled by TBO Treuhand AG (CH-8036 Zurich). The financial statements of Qualibroker AG are prepared by Qualibroker Swiss Risk & Care SA in Lausanne. Tax processing is carried out

by BDO AG (CH-8005 Zürich), and Fiduciaire FIDAG SA (CH-1920 Martigny) is responsible for auditing. These companies have access to Qualibroker AG's business documents as part of their activities.

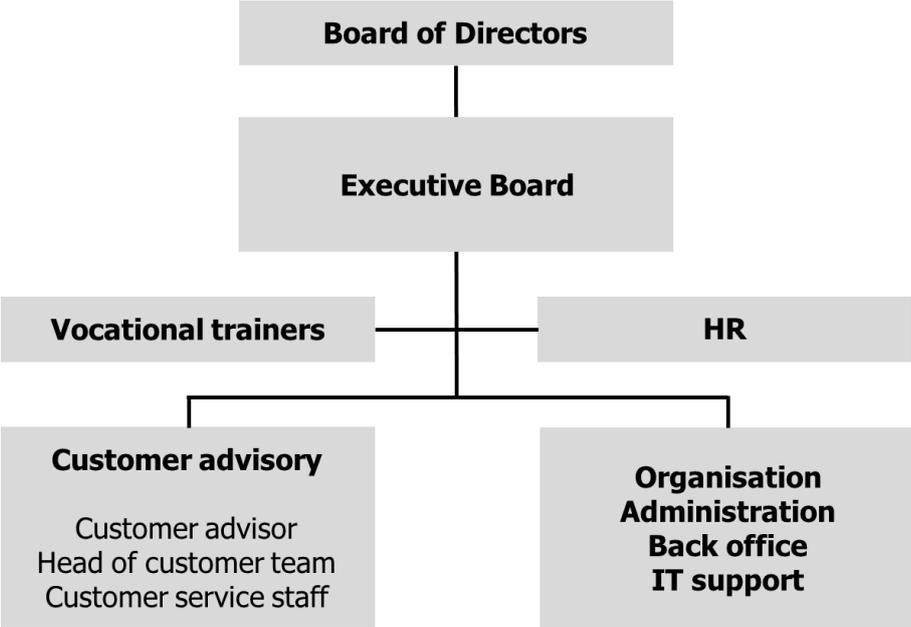
Datarec AG (CH-3006 Bern) is engaged for the GDPR-compliant destruction of documents containing customer and employee information.

Qualibroker AG works closely with its subsidiary in Liechtenstein, Schreiber Maron Sprenger AG, as well as Qualibroker Oberwallis AG and Qualibroker Ticino SA. To enable this collaboration, employees of these companies are generally granted processing rights for the customer data of the respective entities.

### 3. Entities involved

#### 3.1. Organisational areas of Qualibroker AG

Overall responsibility for data protection lies with the Executive Board. This responsibility is not transferable.



## **4. User and data access**

### 4.1. Users

All employees of Qualibroker AG are users of the IT system and can process data. The access authorisations of all employees are documented and granted depending on their function and role.

Qualibroker AG maintains policies on the use of IT and telecom infrastructure.

### 4.2. User management

User administration is carried out by the internal IT coordinator. The Executive Board is responsible for defining the IT access rights of the individual employees.

### 4.3. Cancellation of access authorisation

Users are entitled to access the data for as long as and to the extent that they need it to carry out their activities. In the event of departure or change of task within the company Qualibroker AG, the access authorisation is revoked and the access authorisations required for any new area of responsibility are reissued.

### 4.4. User training

The users of the IT system provided by UMB AG are trained in various ways in the area of data protection and application technology.

Every employee is made aware of the data protection provisions in the company in the employment regulations and signs to receive them. Employees receive regular training in the area of data protection. The training status of each employee is documented.

### 4.5. Instruction/directives

Data processing is governed by directives, regulations and guidelines. These are regularly updated by the relevant authority.

### 4.6. Processes

The data in the information system of Qualibroker AG is collected, processed and passed on in accordance with defined processes. Details on the processes can be found in the respective process descriptions. These documents are easy to find using the process map on the Qualibroker AG intranet and are intended for internal use.

## 5. Data processing/data categories

### 5.1. Data origin

The personal data processed by Qualibroker AG comprises publicly accessible data disclosed by the policyholder, insurer, insured persons or authorised third parties. No data is obtained from other third parties.

### 5.2. Categories of processed data

The main data categories that Qualibroker AG processes in the system or stores on paper are as follows:

- 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)

### 5.3. Registration of data collection with the FDPIC

The statutory provisions do not provide for the registration of data collections processed by Qualibroker AG with the Federal Data Protection and Information Commissioner (FDPIC). As the holder of contact details and contracts of suppliers and outsourcing partners as well as data collections for its own HR administration, Qualibroker AG is exempt from the obligation to register in accordance with Art. 12 para. 5 FADP.

Qualibroker AG processes other data collections from customers as the processor on behalf of these customers. The respective customer remains the owner of these data and is therefore responsible for any registration with the data protection office.

## **6. Data archiving**

Qualibroker AG maintains internal policies concerning document and data storage.

### **6.1. Archiving obligation**

Documents that are subject to archiving are archived for the duration required by law and protected against changes and unauthorised access.

### **6.2. Retention period and deletion**

The statutory retention period of ten years generally applies to the storage of business documents (Art. 958f para. 1 CO). If the business documents are stored electronically or similarly, it must be possible to make them legible again during this time (Art. 958f para. 3 CO).

Unless there is a statutory retention obligation, personal data will be retained for as long as it is necessary for the purpose for which it was collected. Then the data will be deleted.

## 7. Technical and organisational measures

### 7.1. Access control

Access to the office building of Qualibroker AG is secured using a badge/key system. Access to the offices in the building is also only possible by entering a code or using a key. Visitors must ring the bell at the reception so that access can be granted. Visitors must be accompanied at all times on the premises. The rooms with technical equipment for data transmission and data storage, such as servers, are secured with locking systems or access systems and can only be accessed by a restricted group of people.

### 7.2. Data carrier control

Information technology measures enable only authorised persons to process data on the electronic data carriers.

Hard disks, state solid discs and other data carriers that are permanently installed with data processing systems for normal use may not be removed from the systems except for the purpose of disposal or repair. Furthermore, certain IT resources intended for stationary use may not be removed from the premises of Qualibroker AG, except for the purpose of disposal, sale, migration or repair.

Data storage media must be irretrievably erased and, if possible, shredded before disposal.

Documents containing customer-relevant data are destroyed by shredding or disposal (Datarec AG).

### 7.3. Transport control

Particularly sensitive data sent by e-mail is protected using server-to-server encryption.

SIM cards, flash memory, USB sticks and other data carriers intended for mobile use must be supervised and stored securely outside Qualibroker AG. Mobile data storage media must be encrypted if technically possible.

Documents shredded by Datarec AG are stored and transported in locked containers until their actual destruction.

### 7.4. Disclosure control

The data subject must have consented to the disclosure of the data or it must be possible to assume consent in the circumstances. Sensitive customer data may only be passed on in encrypted form. Data transfers are logged. It must always be checked whether the person making the enquiry is entitled to information.

Persons authorised to provide information are stored in the insurance broker software. These are reviewed annually by the customer as part of the annual appraisal.

### 7.5. Memory control

Unauthorised entries, changes or deletions from the memory are prevented by access and authorisation control (e.g. user name/password) and by the IT applications. Regularly updating operating systems and applications minimises malware attacks.

### 7.6. Access control

Access to the information system of Qualibroker AG is only possible with the corresponding authentication data. Access data is defined for each employee. Every employee receives this on their first day of work.

All passwords must be changed in a predefined intervals by the system. It is not allowed to set the same password for the same user twice in a row. If the login details are entered incorrectly several times, access to the information system is blocked and must be reactivated manually by the IT coordinator.

The system is protected against use by unauthorised persons outside Qualibroker AG by means of a fire-wall. Security is monitored on an ongoing basis as part of IT security measures.

## 7.7. Input control

Unauthorised data entry into the memory must be prevented and it must be possible to subsequently check which personal data was entered at what time and by whom in the systems. For this reason, all entries and changes are continuously monitored and logged for reasons of system security and data integrity.

## 7.8. Measures in the area of end devices

Every employee receives a personal password for computer access on their first day of work. This password must be kept strictly confidential and must not be disclosed to third parties. The use of all software or the entire operating system of Qualibroker AG outside the IT resources owned by Qualibroker AG is only possible with the express consent of Qualibroker AG. When leaving the workstation, employees are instructed to block access to the end device.

## 7.9. Separation of test and production servers

In order to test new software modules, data is copied to a test server. All tests are carried out on the test server and only with the data that is on the test server.

## 7.10. Data security breaches

If data security breaches are noticed, the direct line manager and the internal officer responsible for data protection issues must be notified immediately. Thereafter, the reporting obligation pursuant to Art. 22 et seq. FADP is complied with. A process diagram has been created for internal use.

All breaches of data security are listed in a register. The following information is recorded:

- Date of incident and/or discovery of incident
- Who reported the incident
- What happened
- Whether Qualibroker AG as controller or processor is affected
- Assessment of the risk to the privacy and fundamental rights of the data subject(s) affected by the data security breach
- To whom reports of the incident were made and the name and date of the report document
- Causes and effects of the incident
- Which data has been recovered – which of these manually
- How the restoration was accomplished and by whom it was performed
- What measures have been taken
- Responsible person

## 7.11. Working from home

Qualibroker AG offers the option of working from home or another location on a voluntary basis. It has been contractually agreed (employment regulations) that data security must be guaranteed at all times and in all locations. In particular, no

- physical documents are taken home and
- documents can be printed out at home on private devices.

Employees working from home are obliged to ensure that business secrets are protected and that family members and third parties cannot gain access to business data. If these requirements are not met, the option of working from home ends.

## **8. Rights of data subjects**

A natural person who can be identified on the basis of the personal data processed by Qualibroker AG is 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.

### **8.1. Information obligation when collecting personal data**

Qualibroker AG is obliged in accordance with Art. 19 FADP to inform data subjects about the collection of personal data where it acts as the controller for data processing.

### **8.2. Right to information**

Any person may request information from the controller as to whether data about them is being processed, what data about them is available, where this data comes from, the purpose for which it is being processed, to whom the data is disclosed, what categories of data are available and how long the data is stored.

The request for information may be sent in writing together with a copy of the 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.

### **8.3. Right of access and right to rectification**

Data subjects have the right to see their personal data processed by the controller. If incorrect information is stored about them despite efforts to ensure that the data is accurate and up to date, it will be corrected at their request. The data subjects shall be informed of this after the rectification.

### **8.4. Right to deletion**

To the extent that the controller is not obliged or entitled to retain some of the personal data under applicable laws and regulations, data subjects are entitled to have their data deleted from the controller's system.

### **8.5. Right to restriction of processing**

Subject to the conditions set out in Art. 18 of the GDPR, data subjects have the right to obtain from the controller restriction of processing.

### **8.6. Notification obligation in connection with rectification or deletion of personal data or restriction of processing**

In accordance with Art.19 of the GDPR, 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.

### **8.7. Right to data portability**

Data subjects have the right to receive the personal data concerning them, which they have provided to a controller, and to transmit it to another controller without hindrance from the controller to which the personal data have been provided.

### **8.8. Right to object**

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

### **8.9. Right to withdraw consent**

Any consent to data processing that has been granted to Qualibroker AG may be revoked in accordance with Art. 7 GDPR. Revocation is as easy as granting consent.

### **8.10. Right to lodge a complaint**

Data subjects have the opportunity to lodge a complaint with the competent data protection authority in the event of a violation of their rights.

## 9. Final provisions

### 9.1. Amendments to the Policy

The Data Processing Policy is updated on a regular basis. It may be amended at any time. Changes must be made in writing and approved by the Chair of the Executive Board and the office responsible for data protection.

### 9.2. Approval

This Data Processing Policy has been approved by the Executive Board of Qualibroker AG and enters into force on 18.02.2026.



Urs Thalmann  
Managing Director



Daniel Oberhänsli  
Member of the Executive Board

In the event of any discrepancy between the German version and a translation, the German version shall prevail.