



# Data Protection Policy

Qualibroker Ticino AG

Valid from: 18.02.2026

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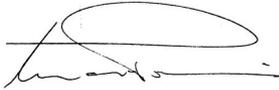
For the sake of readability, gender-specific differentiation is not used throughout the document. All references to persons apply to all genders in the interests of equal treatment.

## 1. Version control

### 1.1. Change control

Date	Version	Name	Description
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 Regulations' (Chapter 2: Information System Structure) as well as the document "Outsourcing Partners and Suppliers".
18.02.2026	4.1	Natascha van Berkum	Adjustment of Chapter 2.4: Disclosure of Data to Third Parties, as well as the document "Outsourcing Partners and Suppliers".

### 1.2. Approval

Date	Version	Name, position	Signature
01.09.2023	3.0	Piermichele Bernardo Managing Director	
01.09.2023	3.0	Marco Preiano Head of Account Management	
02.12.2025	4.0	Piermichele Bernardo Managing Director	
02.12.2025	4.0	Marco Preiano Head of Account Management	
18.02.2026	4.1	Marco Preiano Head of Account Management	

## **2. Data Protection Policy**

### **2.1. General**

Qualibroker Ticino 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 Ticino AG wishes to inform you that it complies with the applicable data protection provisions. The Data Protection Policy of Qualibroker Ticino AG is based on the security and data protection guidelines of Qualibroker Ticino AG.

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

As an insurance broker, Qualibroker Ticino AG is also responsible for processing (receiving, saving, 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 Ticino 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 Ticino 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 Ticino AG processes data in connection with its activities as an insurance broker with the help of the companies UMB AG and Silicom SA (outsourcing IT), Brokinsoft SA (broker software), Powerfully GmbH (digital process optimisation), Datarec AG (data destruction), Impulse-Group GmbH (HR-Management), Ostendis AG (Job application tool), Triboni AG (document management system), Microsoft 365 (Outlook, Teams and Sharepoint) and Agence SPRITZ (Website development). 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), Fiduciaire FIDAG SA (audit), Witzig The Office Company AG and Axius Services SA (Printers) and Oberhäsli Kurier AG (Mail courier). Thanks to the

close collaboration with Schreiber Maron Sprenger AG, Qualibroker AG and Qualibroker Oberwallis AG, their personal data is processed by Qualibroker Ticino AG.

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

## 2.5. Duration of storage

Qualibroker Ticino AG processes personal data for as long as this is necessary to fulfil the aforementioned purposes. The statutory retention period of ten years generally applies to the storage of business documents (Art. 958f para. 1 CO). Qualibroker Ticino AG also stores data for the period in which claims can be asserted against Qualibroker Ticino AG.

## 2.6. Principles for data protection

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

- Proportionality is the basis of data processing at Qualibroker Ticino 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 Ticino AG processes data exclusively for contractual fulfilment and guarantees data security.
- The Executive Board of Qualibroker Ticino 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 Ticino AG are familiar with the meaning of data and information and receive regular training.
- All employees of Qualibroker Ticino AG are familiar with the statutory provisions and internal guidelines and act accordingly.
- All employees of Qualibroker Ticino 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 or commissioned by Qualibroker Ticino AG are obliged to maintain confidentiality and to comply with data protection in accordance with the guidelines and the contractual provisions.
- Qualibroker Ticino AG handles data, information, processes and infrastructure responsibly.
- All employees of Qualibroker Ticino 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 Ticino AG has the required quality management. All data processing is documented by them and is therefore traceable. Qualibroker Ticino 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 Qualibroker Ticino AG, you are a data subject. Qualibroker Ticino 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 Ticino 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 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 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 Ticino 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 Ticino AG shall inform the data subject about these recipients if the data subject requests this.

### **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 Ticino AG can 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:

Alessandro Paltenghi  
Managing Director

Qualibroker Ticino AG  
Via S. Balestra 22b  
6901 Lugano, Switzerland

Phone +41 58 854 03 34

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

## 2.10. Right to make changes

Qualibroker Ticino AG reserves the right to amend this Data Protection Policy in line with current statutory provisions at any time. The version published at <https://www.swissriskcare.ch/en/data-protection-policy/> applies.