

# a.s.r. Vitality Privacy Statement

## This is how your privacy is safeguarded at a.s.r. Vitality

Are you joining a.s.r. Vitality? Then you will share personal data with us, such as your name and e-mail address. You can also share your eating and exercise habits. We use this personal data to give you insights on how fit and healthy you are and to reward you based on the results of the various questionnaires and your exercise patterns.

This is privacy-sensitive information. We handle your privacy with care and in this privacy statement we will explain how this is achieved.

## 1. Who are we?

a.s.r. Vitality is a health program consisting of the a.s.r. Vitality website and the a.s.r. Vitality app. a.s.r. Vitality processes (special categories of) personal data from a.s.r. Vitality members.. a.s.r. Vitality's legal entity is ASR Vitaliteit en Preventieve Diensten BV. This entity is part of ASR Nederland NV.

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### Working Partnership with Discovery Group

The administration of the a.s.r. Vitality app, further development and the processing of personal data in this app, are undertaken by the Discovery Group on behalf of a.s.r. Vitality. a.s.r. Vitality is the controller for all personal data and Discovery Group is the processor. Discovery is our South African partner who markets the Vitality program globally in cooperation with various partners. The a.s.r. Vitality app was developed in cooperation with Discovery and all data within the app is administered through a Discovery Group platform based in Frankfurt. This means that all processing of personal data falls within the scope of the AVG (Algemene Verordening Gegevensbescherming) or the GDPR (General Data Protection Regulation). Discovery does not have access to participants' personal data unless this is necessary to resolve a technical issue or perform certain app maintenance. In accordance with our agreement with Discovery, European privacy legislation applies to the processing of personal data. To ensure that Discovery meets its contractual obligations, periodic audits will be conducted. When you connect your activity tracker to the a.s.r. Vitality app, you give consent to the activity tracker supplier to share activity data with a.s.r. Vitality. This is done via the Vitality Data Platform (VDP) in the United States. Your Vitality ID and activity data is stored on the VDP, but not your name or address. The VDP periodically retrieves the activity data for which you have given consent and, based on your Vitality ID, shares this data with the Frankfurt platform. We score your activities for points. Check your points total in the the a.s.r. Vitality app.

## 2. How do we handle your personal data?

a.s.r. Vitality will handle your personal data with the utmost care. In doing so, we comply with the applicable (privacy) legislation.

### When do we process your personal data?

This privacy statement is applicable to the personal data that a.s.r. Vitality processes from a.s.r. Vitality members, when you visit our website or use our apps, when you contact our Service Team or if you purchase products or services through the program from one of our partners.

Would you like to know more about the processing of personal data by other entities within ASR Nederland N.V.? Take a look at the [a.s.r. Privacy Statement found](#).

## 3. What personal data do we collect and process?

We collect your personal data when you're interested in becoming an a.s.r. Vitality member or when you are a member of a.s.r. Vitality. We collect your data for example via cookies on our website or when we ask you to share your personal data with us. We receive this information directly from you or from your employer, , for example via the website, e-mail or telephone or via an adviser or intermediary (hereinafter: adviser). We only process personal data if we have a legal basis for doing so. Cookies, contact details, name and address.

### **Which data we process depends on the contact we have with you:**

We use cookies to analyze your visit to our website and to monitor the use of our app.

When you request information from us, we will ask for your contact details so that we can send the requested information to you.

If you become an a.s.r. Vitality member, we will need at least the following details from you: name, sex, date of birth, address, zip code, domicile, telephone number, e-mail address and IBAN. We use this information for the performance of execute the contract with you.

### **Financial data**

If you are an a.s.r. Vitality member (not participation via you employers contract) we process your IBAN. We use this to collect the membership fee. When you want to receive cashback on the purchase of an activity tracker, you give us specific consent to use your IBAN to pay / transfer the cashback on the activity tracker.

### **Additional data**

In addition to name and address details and any required financial details, we also ask for your gender and date of birth. We use your gender to set up the a.s.r. Vitality app and to be able to address you correctly. We use your date of birth to check if you meet the age limit of 18 years to and to assess whether you can participate in the program. We also use your age to determine your a.s.r. Vitality age. If you participate in a.s.r. through your employer. Vitality, we will also process your employee number. We receive this number from your employer for the registration process of employees.

### **Special categories of personal data**

When you are an a.s.r. Vitality member we also processes special categories of personal data. This is personal data referring to your health. Before you share special categories of personal data with us, you must give us your explicit consent (informed consent). Only then may we process this data. Without consent, we are not permitted to process your health data nor will you be able to participate in the a.s.r. Vitality program.

When you want to claim rewards and/or you complete questionnaires and/or you have the a.s.r. Vitality Health Check carried out, you can choose, as an a.s.r. Vitality member, to share the following special categories of personal data with us or with one of our partners:

- (sports) activities (1\*)
- Location data (by using the a.s.r. Vitality Cycling app)
- lifestyle
- eating habits
- blood pressure
- heartbeat
- cholesterol
- BMI & waist size
- whether or not you smoke and/or have smoked

When you share this information with us, you can qualify for the weekly and monthly rewards. Furthermore, we automatically process this data in order to determine your a.s.r. Vitality age, to ascribe points towards your Vitality status and to provide tips on a healthy lifestyle and diet.

The processing of this special categories of personal data only takes place within the legal entity of a.s.r. Vitality and these special categories of personal data are not shared with other entities within ASR Nederland.

(1\*) When you link an app (such as Apple Health or Samsung Health) or an activity tracker (such as an Apple Watch or Fitbit) to the a.s.r. Vitality app, we receive information about your (sports) activities. We use this information to ascribe points for your performance.

The use of any app or activity tracker is your own responsibility. This privacy statement does not apply to privacy practices of these apps or activity trackers or the way they handle your personal data. Please note that many of the providers of these apps or activity trackers are established outside the European Union and may store data outside the European Union. As a result, other privacy legislation than the AVG/ GDPR may apply. We encourage you to read the privacy statement of these suppliers for more information on how they process your data and any rights you may have.

By using the a.s.r. Vitality cycle app the location data will remain in The Netherlands. With Discovery Group, only your a.s.r. Vitality number, the date of the bike ride, the average speed and the number of kilometers traveled will be shared.

### **Information about your contacts with us**

We process data concerning the contact you have had with us:

- What was the contact about (product, advice, offer, service call, message, complaint, information)?
- When was the contact and with whom?
- How (by phone, mail, chat, our website, e-mail, newsletter, app, advisor, web care team).

We use this data to see what we have discussed with you previously. We can save this data in the member file, which helps us to help you more effectively at a next contact. We also use this information to improve our service.

### *Recording and storage of phone calls*

We record and store chat and phone calls for training and coaching purposes, to monitor transactions, prevent fraud and to comply with legal obligations. Recorded conversations are not kept longer than necessary. Conversations recorded for training and coaching purposes are saved for four weeks.

If a call was recorded and is still available, in the event of a dispute regarding the content of the recorded call, you have the right to listen to the recording or to receive a transcript of the recording.

## **4. Where do we get your information from?**

In most cases we receive the personal data directly from you. In addition to the information received directly from you, we may also receive and process data from third parties, for example your employer or other (external) parties, such as other ASR Nederland entities.

We only receive information from other ASR Nederland entities in order to be able to link you a.s.r. Vitality membership to your insurance policy. So the other entity (such as a.s.r., Ditzo and Loyalis) can pay out the cashback on your insurance fee.

In our record of processing activities we register the sources from which we receive personal data.

## 5. Why do we process your data?

We use this data to be able to communicate with you, to ensure that you can use the a.s.r. Vitality program efficiently and to be able to check whether you have an insurance policy with one of the entities of ASR Nederland. This is explained in more detail below.

### To provide our services

We use your personal data when you contact us or when we contact you, to investigate the possibility of you becoming one of our members or to make any changes to your data. We also use your data to be able to establish whether you are entitled to the rewards offered to our a.s.r. Vitality members. For example when you fill in the health questionnaire in the a.s.r. Vitality app. We also use your personal data to determine your status, based on your annual results, which may give you the right to a cashback on your insurance fee.

### Reducing risks

We also use your personal data to reduce risks, for example by: ensuring appropriate security. Consider usernames, passwords and control questions, conducting an internal quality survey to identify possible problems and risks and to check whether legislation is properly implemented. Also the detection of fraud, exploitation and improper use.

### Marketing activities

We like to keep you updated. For example with e-mails, newsletters, offers on our website or via social media. Or with personalized advertising on third-party apps and sites and social media.

We can do this by:

- analyzing the information whether or not you have insurance with us (yet). We also make use of cookies for this purpose. For more information, please see our cookie policy.
- collecting your choices and searches when, for example, you visit our website or apps and open e-mails such as the newsletter. We analyze them. For example, your interest in becoming an a.s.r. Vitality member.

Would you prefer not to receive personal commercial offers? No problem, you can modify your preferences via the a.s.r. Vitality app. You can also find an unsubscribe link at the bottom of our e-mails.

### Improve and innovate

We use your personal data to improve our products and services. This is achieved by combining and analyzing the data.

This analysis gives us to new ideas and solutions. This analysis allows us to:

- Resolve the cause of complaints, improve pages and forms on the website and speed up processes.
- Measure how clients use our services and show us the results of a campaign. And if necessary: improve things.
- Develop new services.
- Create reports from our analyses and insights and provide information services at an aggregate level. Wherever possible, we will remove personal data that is not needed when preparing analyses and we will bundle data to a certain abstraction level (aggregation), encrypt (pseudonymization) or anonymization.

## 6. What is the legal basis for using your personal data?

We process your personal data on the basis of one of the following legal basis:

- a) You have given consent.  
We only ask for consent if this is necessary for the processing of your personal data. If we process your personal data on the basis of your consent, you are always able to withdraw your consent. To withdraw your consent contact us by e-mail or phone.
- b) The processing is necessary for the performance of the contract of you a.s.r. Vitality membership, for example when sending a welcome e-mail providing you with the necessary code to allow you to download the a.s.r. Vitality app.
- c) The processing is necessary in order to comply with legal obligations. For example, we are required to process or retain certain data in order to comply with the record keeping requirements of our financial administration.
- d) The processing is necessary for the protection of legitimate interests, such as during the investigation of a possible fraud. In doing so, we weigh our interests or the interests of third parties against your interest and your right to privacy

## 7. How do we protect your data?

We handle your personal data with care and take the necessary technical and organizational measures\* to ensure an appropriate level of protection. We are committed to optimal security of our systems. We monitor the safety of our data traffic 24/7. Our processes are set up in so that only those employees who require access to certain systems are granted such access. In certain circumstances (for example, access to specific personal data), employees must first sign an additional confidentiality agreement before being granted access.

### \* Technical and organisational measures

We have an information security policy and have taken technical and organizational measures to protect your data from loss or unlawful processing. This includes measures to ensure our website and IT systems remain safe to use and to prevent any exploitation of the data. The security of physical spaces where data is stored is also of the highest priority. We also provide our employees with training on personal data protection. Only authorized personnel can view and process your data.

## 8. How long do we keep your data?

We do not keep your data for any longer than is necessary. In some cases, the law determines how long we may or are required to retain data. In other instances, we determine for how long we need your data in accordance with current legislation. We have drawn up an extensive retention period policy in these cases.

As long as you are an active member in the a.s.r. Vitality program, we need your personal data for your participation to the program. An exception to this is information about your WhatsApp contacts with our Service Team. We delete this information eighteen months after your contact with us.

For the remaining data, we apply these retention periods after your membership has ended:

- Data on completed questionnaires: 6 months
- Data on exercise activities: 6 months
- Financial data: 7 years
- Personal data (non-financial data): 6 months
- Data on achieved weekly goals: 6 months
- Data on bicycle rides in the a.s.r. Vitality Cycling app: 3 months

## 9. With whom do we share your data?

We only share personal data with other companies when this is permitted by law and if it is necessary for the performance of a contract and for our business operations.

### **ASR Nederland N.V.**

We may share your personal data with one of the other ASR Nederland NV entities. We only share information with other ASR Nederland entities in order to link you a.s.r. Vitality membership to your insurance policy. This is necessary to determine whether you already have an insurance with us, because this is a condition for being a member of a.s.r. Vitality and is necessary for the other entity to be able to pay out the cashback on your insurance. For the rest, the data of a.s.r. Vitality is not shared with other entities within ASR Nederland.

Your details will never be used for the acceptance of your insurance application, the determination of the amount of your insurance fee, access to care or the assessment of a claim.

### **Discovery Group**

See chapter 1 working partnership with Discovery Group

### **Employers**

Are you an a.s.r. Vitality member via your employer? Then it is good to know what your employer can and cannot see with regards to your personal data:

- Your employer will not receive any information regarding your health, whether or not you exercise, whether you meet your weekly or monthly goals, or how many points and rewards you have earned.
- Your employer cannot see which a.s.r. Vitality Status you have achieved. Your employer will receive a monthly report supplying the average status of all employees taking part in the a.s.r. Vitality program.
- This average is based on the amount of Vitality Points all participating employees have accumulated. Furthermore, employees' points with a higher Vitality Status are also valued more highly. This average status determines how much cashback your employer receives on their insurance policies at one of the ASR Nederland NV entities.
- Only when 15 or more employees participate in the a.s.r. Vitality program your employer will see the following: the number of participants (male/female), the number of participants per Vitality Status, the average age of the participants and the average Vitality age. The limit of 15 employees has been chosen to ensure that the employer cannot trace the data back to one specific employee.

Please note do you work for an employer with less than 15 employees? It is possible that average status and/or the amount of cashback your employer receives on his insurance at one of the other ASR Nederland entities may give the employer a rough picture / indication of the Vitality status of its employees.

If your employer has an insurance that is linked to the a.s.r. Vitality program, the adviser of this insurance can receive the same information as your employer. Like the employer, the advisor never receives information about individual participants.

### **Advisors**

It is also possible that you apply for an a.s.r. Vitality membership via an independent advisor. This is what your advisor will see:

- What insurances you have
- If you are an a.s.r. Vitality member

Your advisor will not receive any information regarding to your health, whether or not you regular exercise, whether or not you meet your weekly goals, or how many points or rewards you have earned. Your advisor does not know your a.s.r. Vitality Status.

### **Service providers and companies we work with**

We cooperate with different partners to offer our a.s.r. Vitality program. They help us, for example, by providing rewards, offering an event, sports lesson or challenge or by carrying out health checks. Our partners will only see your data if they need it in order to provide the services you have requested.

The partners can only use your data to provide the service you desire. a.s.r. Vitality is primarily responsible for the processing of your data. We ensure that the processing of your data by our partners only takes place in accordance with the applicable laws and regulations.

If you register yourself and create an account with a partner, they can process your personal data so that you can, for example, participate in an event or use the webshop. In the privacy statement of the partner you can read how they handle your data.

A partner and a.s.r. Vitality may exchange your personal data between themselves to ensure that you receive points or redeem a reward. This exchange will only take place if you have created an account or registered with the specific partner.

### **The government**

Sometimes we are required by law to share certain personal data with the government.

### **Third parties outside the European Economic Area (EEA)**

If we share data with a service provider in a country outside the EEA, we will make arrangements with them to ensure that they comply with the rules of the AVG/ GDPR.

The contacts include arrangements on the use and security of the data. We use of Standard Contractual Clauses; this model is approved by the European Union by which an adequate level of protection for the security of personal data is created.

## Our processors for the a.s.r. Vitality Cycling app: Social Brothers and Mobidot

The management and further development of the a.s.r. Vitality cycle app and the processing of personal data in this app is commissioned by a.s.r. Vitality performed by Social Brothers and Mobidot. They are therefore a processor for a.s.r. vitality. a.s.r. Vitality is the controller for all personal data. We have concluded a processing agreement with both partners.

The a.s.r. Vitality cycle app ensures that bicycle rides can be registered and you can earn points for this. The app determines whether a movement is a bicycle ride by means of motion sensors and location data. All data that Social Brothers and Mobidot collect and process from you are stored in the Netherlands. Only Social Brothers and Mobidot have access to the location data you share, it is not shared with us or Discovery Group.

The moment you enter the a.s.r. Vitality Cycling app links to the a.s.r. Vitality app, then you give permission to the bicycle app to share data about your bicycle rides with a.s.r. vitality. It's all about your a.s.r. Vitality number, the date of the bike ride, the average speed and the number of kilometers covered. This is done via the Vitality Data Platform (VDP) in the United States. The VDP periodically collects the bicycle data and shares it on the basis of your a.s.r. Vitality numbers this data with the platform in Frankfurt. Based on this, the points you have earned are awarded and you can see this reflected in the a.s.r. Vitality app. In the bicycle app you can see the bicycle rides made in the last three months.

## 10. What are your rights?

As a member of the a.s.r. Vitality program, you may have the right to access, rectify, delete, restrict the processing, transfer, object and withdraw given consent for use of personal data. You can read what these rights are and how you can exercise them below.

### Submit a request

You can use your rights by contacting us at: [mail@vitality.nl](mailto:mail@vitality.nl).

### Access and rectification

You may ask us whether we process your personal data, and if so which data this concerns. If the data is incorrect you have the right of correction (rectification). First and foremost, you can view or correct your data in the a.s.r. Vitality app or you can contact us via the usual channels (including chat, WhatsApp). We ask verification questions to establish your identity.

### Having data deleted and the right to be 'forgotten'.

You may have the right to have data deleted and the right to be 'forgotten' when: the personal data is no longer necessary for the purposes for which it was collected or otherwise processed:

- you have withdrawn your consent to the processing of your personal data
- you raise a valid objection to the processing
- your personal data has been processed by us in an unlawful manner
- there is a legal obligation to delete the personal data

The right to be forgotten is not an absolute right. We don't always have to do that, and sometimes we are not allowed to do that either. When your request is not based on any of the above grounds, or (i) to exercise the right to freedom of expression and information; (ii) to comply with a legal obligation; or (iii) for the establishment, exercise or substantiation of a legal claim.

If we do not comply with your request to have your personal data deleted, we will inform you about our reasons.

### Restriction of processing

If you believe that we are processing your personal data unlawfully or that the data we are processing is incorrect, you can request to restrict the processing.

This means that we temporarily won't process your personal data.

### Transfer of data (data portability)

You have the right to receive a copy of the personal data you have previously provided to us in the context of a contract with us or with your consent. This only applies to personal data that we have received from you and not data that we have received from third parties. The purpose of this right is to enable you to easily transfer this data to another party.

### Right to object

When we process your data on the basis of our legitimate interests or the legitimate interest of a third party, you have the right to object to the processing of your personal data. In this case we will no longer process your data, unless there are compelling legitimate grounds for processing or which outweigh or relate to the establishment, exercise or substantiation of a legal claim.

### Unsubscribe from personal offers

You have the right to unsubscribe from newsletters or personalized offers relating to our products. Commercial offers always provide an unsubscribe option.

## 11. E-mail and social media (chat, WhatsApp, Facebook, Instagram)

### E-mail

We will communicate with you about the Vitality program via e-mail. It is possible to unsubscribe from certain e-mails, you can do this by clicking on the unsubscribe link at the bottom of the e-mail.

### Social Media

You may choose to chat with us, contact us via our social media pages such as Facebook and Instagram or via WhatsApp. If you choose to contact us via one of these channels, we will also store the data you provide us via these channels in a secure environment. To be able to respond to personal questions in your social media message, we ask you to share your contact details with us in a personal message (direct message or e-mail). We can then verify your identity and make sure we only share your personal information with you.

This privacy statement applies to the information that you share with us via these platforms and how we use it. The use of social media is your own responsibility. This privacy statement does not apply the privacy practices or the way social media platforms handle your personal data. Please note that many social media platforms are located outside the European Union and may store data outside the European Union. As a result, privacy legislation other than the AVG/GDPR may apply. We encourage you to read the privacy statement of these social-media platforms for more information on how they process your personal data and any rights you may have.

## 12. Profiling and automated decision-making

We communicate with you about the Vitality program. Furthermore, we create client profiles based on the accumulated data, allowing data analysis and to gain an insight into (future) actions and preferences. This gives us the opportunity to respond and adapt. For example, sending targeted advertising/information to (potential) members based on browsing habits tracked via tracking cookies. In doing so, we comply with laws and regulations. We ask for consent beforehand should this be required by law. For example, in the case of profiling based on special categories of personal data.

### **a.s.r. Vitality age**

The a.s.r. Vitality age gives an indication on how healthy you are and is based on more than 10 risk factors. We calculate your a.s.r. Vitality age via an algorithm based on the a.s.r. Health questionnaire, the a.s.r. nutritional test, the a.s.r. Vitality Health Check and the Non-smokers declaration. The outcome of the calculation of your a.s.r. Vitality age gives you an indication of how healthy you are. Your a.s.r. Vitality age does not affect the objectives laid out in the a.s.r. Vitality exercise program. The weekly goals, rewards and points to be achieved will not change when your a.s.r. Vitality age changes. This means that automated decision-making based on profiling exists, however there are no consequences or legal effects for you as a result of this automated calculation.

### **a.s.r. Vitality Status**

The four different Vitality Statuses are: bronze, silver, gold and platinum. Your status depends on the number of points you earned. The number of points you receive for each activity or questionnaire and the number of points you need for each Vitality Status are predetermined. Have you carried out and added an activity to the Vitality app? Then the corresponding points are automatically ascribed to you. If your total of points rises above your current Vitality Status, your Vitality Status will also be adjusted automatically. Your a.s.r. Vitality Status can be shared with the other ASR Nederland NV entities allowing them to pay out the cashback you have earned.

The a.s.r. Vitality Status is an automated decision. The consequence or legal effect for you is the cashback you receive that matches with the Vitality Status you have achieved by the end of a calendar year. Article 22 of the AVG/ GDPR therefore applies in this case. The automatic determination of the a.s.r. Vitality Status is necessary to be able to perform the contract between you and a.s.r. Vitality. It is therefore not possible to participate in the a.s.r. Vitality program if you object to the fact that your a.s.r. Vitality Status is an automated decision.

### **a.s.r. Vitality Cycling app**

If you use the a.s.r. Vitality bike app, you can earn points with your bike rides. On our website you can read when you earn which points. In order to earn these points, your bike rides must be registered. For this you can choose between manual or automatic registration. If you choose manual registration, you start and stop the registration of your bicycle ride yourself. If you opt for automatic registration, the Cycling app will register all your movements.

All movement data recorded by the app (manually or automatically) is reviewed by our partner Mobidot. Mobidot uses an algorithm to determine whether a move is a bicycle ride or not. If it is a bicycle ride, you can see the ride in the a.s.r. Vitality bicycle app and you can see it in the a.s.r. Vitality app returns how many points you got for that bike ride. This assignment of points is also automatic and works the same when assigning points for other activities, for example via an activity tracker.

To determine whether a trip is a bicycle ride, we therefore use automated decision-making. The consequence for you is that if a move is a bicycle ride, it will be passed on to us and you will earn points for it. If a move is not qualified as a bicycle ride, you will not receive any points for it.

### **Questions about profiling and automated decision-making?**

Do you have questions about the number of points for an activity or do you want to know why you have a certain status? Check out our website or contact our Service Team. If you think something went wrong with the awarding of the points, we can investigate this for you and adjust the points if something has indeed gone wrong.

## 13. Competent authorities

A number of authorities oversee how we process personal data:

- The Dutch Data Protection Authority (AP); monitors compliance with the AVG (GDPR)
- The Authority for Consumers and Markets (ACM); supervises compliance with the Telecommunications Act (including cookies and direct marketing)
- The Dutch Central Bank (DNB) and the Netherlands Authority for the Financial Markets (AFM) generally supervise the financial sector (including the interests of members)
- The Data Protection Officer is our internal supervisor.

## 14. Changes of the privacy statement

We can change our privacy statement from time to time We in order to keep it up to date. This is possible in the event of new developments, for example a change in our business activities or a change in the law or the judiciary. We therefore recommend you to check this privacy statement regularly when visiting one of our websites. We will also actively inform you about changes to this privacy statement by means of a pop-up banner, e-mail or news message on the website or via the a.s.r. Vitality app. You will always find the most current version of our privacy statement at [www.asr.nl/vitality/privacy](http://www.asr.nl/vitality/privacy)

## 15. Questions or complaints?

Do you have questions concerning this privacy statement or do you want to know which personal data we process? Please contact our Data Protection Officer. Send an e-mail to [privacy@asr.nl](mailto:privacy@asr.nl). or a letter to:

a.s.r.  
Att. Data Protection Officer  
Department Integrity  
Postbus 2072  
3500 HB Utrecht

If you have any complaints concerning the way we handle your privacy, you can contact us via the [complaints form](#) on our website. You have the possibility to ask a question or file a complaint with the Dutch Data Protection Authority (AP) [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl), tel. 088 - 1805 250.

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