

**Comments Template on
Consultation Paper on draft Implementing Technical Standards (ITS)
on a standardised presentation format of the Insurance Product
Information Document (IPID)**

**Deadline
24 October 2016
18:00 CET**

Name of Company:	DECO	
Disclosure of comments:	<p>EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.</p> <p>Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.</p>	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ <u>Do not change the numbering</u> in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool ⇒ Leave the last column <u>empty</u>. ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <p>Please send the completed template, in Word Format, to CP-16-007@eiopa.europa.eu.</p> <p>Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the questions refers to the Consultation Paper on draft Implementing Technical Standards (ITS) on a standardised presentation format of the Insurance Product Information Document (IPID)</p>		

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Reference	Comment	
General Comment	<p>EIOPA is currently consulting on the draft standardized information sheet for non-life insurances, the so-called Insurance Product Information Document (IPID). The objective of the IPID is to help consumers compare non-life insurance products (motor insurance, household insurance, health insurance, multi-risk insurance policies, etc.) across the market and make an informed decision.</p> <p>The content of the IPID is already determined by the Insurance Distribution Directive (IDD). The IPID contains information about the type of insurance coverage, means and duration of payment of the premium, major exclusions, obligations at the beginning and length of the contract, participation of an accident, and early termination of the contract and ways of ending the contract.</p> <p>It is also proposed a draft document with uniform criteria for the presentation of the respective sections and titles, use of icons, font and body and length of the document. The public consultation includes questions such as the possible barriers to the use of this document, use of standardized icons at European level, possible difficulties in delivering this document in digital format compatible with various media (websites, tablets, and smartphones) and costs for the sector.</p>	
Question 1	<p>Concerning multi-risk policies, that combines numerous covers witch also are for sale separately we defend that there must be a IPID per market supply, ie, for each insurance proposal available to the consumer should be a IPID, regardless of coverage. In practice we find that the commercial offers of these products are very similar between insurance companies.</p> <p>Only this way we can guarantee/ensures greater transparency, simplification and better comparability between all commercial offers.</p>	
Question 2(a)	yes	
Question 2(b)	-	

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Question 3(a)	Depends of the number of situations that are excluded from the coverage of the contract	
Question 3(b)	No	
Question 4(a)	-	
Question 4(b)	Great importance as more and more are used this type of technology	
Question 5	-	
Question 6	Yes	