



## Instructions

### Reporting jurisdiction

The response should cover only one jurisdiction. If you have been requested to provide information for your operations in more than one jurisdiction, please fill out a separate questionnaire for each jurisdiction.

Select from the drop-down menu for the jurisdiction covered in this response.

Respondent name/code	
Jurisdiction covered	

### Entering quantitative answers

Report all figures rounded to the nearest whole number, unless indicated otherwise.

In case no exact figures are available, please respond on best effort basis providing an estimate. Where estimates are reported, please indicate this in the relevant comment box.

Monetary figures are to be reported in euro (EUR) or thousand of euro (EUR 000's), as indicated in each question where relevant. If the currency of the reporting jurisdiction is not the euro, convert data by using the official exchange rate published by local authorities on the last working day of the corresponding year.

In cases where you hold no data, please input "N/A" in the relevant cell. If you collect data on a particular data item and the actual value is "0", please input in "0" in the relevant cell.

Where breakdown/granularity of data is not available, please input available data in the appropriate subtotal cell(s) or total cell(s) and provide explanations in the relevant comment box.

### Entering text

Enter your answers in the light-blue coloured cells.

Use comment boxes to:

- Provide further details and explanations to answers, where required;
- Provide explanations to data entered in the tables, if relevant.

The size of comment boxes is not an indication of the expected length of the answer. Expand comment boxes if necessary.

### Completing tables

Tables include two types of cells:



Light-blue coloured cells - provide quantitative data or answer



Grey coloured cells - no answer required

For single choice and multiple choice questions put a cross [X] in the selected answer(s).

### In and out of scope travel insurance products

All types of travel insurance products are within scope of the thematic review, except the following:

- Long stay travel insurance;
- Products exclusively for domestic travel;
- Products exclusively covering vehicle roadside assistance.

## Definitions

Term	Definition
<b>Complaint causes</b>	
Administration and customer service	Complaint related to general administration of the contract (e.g. failures and errors), failure of the IT system, online accessibility, non-compliance with duty of secrecy, infringement of personal data, discriminatory practices, documentation, disputed transactions, misappropriation/fraud, customer service, etc.
Advising, selling and arranging	Complaint related to the sales of travel insurance products including unfair commercial practices, infringement of information requirements, any kind of market conduct related issues in accordance with sales practices, including marketing/sales literature, advising, selling and arranging, misselling, poor advice, advertising/communication with public, etc.
Claims	Complaint related to an insurance claim, claim-handling, claim refusal, delays in issuing a claim, compensation (e.g. amount and delay), any kind of claims disputes, etc.
Commission, charges and premiums	Complaint related to commissions, charges, premiums, calculation of the premium, overcharging, undercharging, etc.
Terms and conditions	Complaint related to the terms and conditions of the insurance contract, changes to the contract, termination of the contract, unfair contractual terms, insurance coverage, interpretation of contractual terms, etc.
<b>Distribution channels</b>	
Ancillary insurance intermediary	Natural or legal person whose main business is not insurance-related who, for remuneration on an ancillary basis, takes up or pursues insurance or reinsurance distribution as a secondary activity; satisfy all the conditions set out in Article 2(1)(4) of the IDD.
Bancassurance	Distribution carried out by a banking and credit institution (e.g. retail and commercial bank, internet bank, mortgage and credit provider, credit card provider, etc.) resulting from partnership or relationship between the insurance undertaking and the banking or credit institution where the latter acts as agent and the insurance undertaking uses the banking or credit institutions' sales channels such as bank branches or websites.
Comparison website and aggregator	Online interface (website or other media) with the purpose of providing information concerning one or more insurance contracts in accordance with criteria selected by customers and the compilation of an insurance product ranking list, including price and product comparison, or a discount on the price of an insurance contract, when the customer is able to directly or indirectly conclude an insurance contract using the online interface.
Direct sales	Sales by the insurance undertaking without the use of an insurance intermediary, comprising sales through the insurance undertaking's branches, employee sales agents/staff or the insurance undertaking's website.
Insurance agent	Insurance intermediary authorised to conduct business on behalf of the insurance undertaking and who negotiates insurance contracts as an insurance undertaking's representative. Can operate exclusively for the insurance undertaking ("single-tied agent") or for more than one insurance undertaking ("multi-tied agent").
Insurance broker	Insurance intermediary who negotiates insurance contracts on behalf of an insured party (policyholder) with insurance undertakings. In contrast with an insurance agent, the broker's primary alliance is with the insurance buyer not the insurance undertaking and usually works with multiple insurance undertakings to place coverage for customers.
Online travel specialist	Online-based company specializing in travel-related services and products to consumers including hotel and restaurant reviews and other travel-related content, accommodation and travel bookings and travel metasearch engines. E.g. Bookings.com, TripAdvisor, Expedia or Trivago.
Travel agent / tour operator	Natural or legal person that engages in selling or providing travel and tourism related services to the public on behalf of suppliers such as activities, airlines, car rentals, cruise lines, hotels, railways, and package tours.
Transport company	Entity providing transportation services of goods and people, including airlines, bus operators, ferries and cruise lines operators, railway operators, etc.
<b>Financial ratios</b>	
Claims ratio	Claims paid (excludes claims reserves and Incurred But Not Reported - IBNR) as a percentage of gross written premium charged during a specified period.
Commission ratio	Commissions paid to insurance distributors as a percentage of gross written premium charged during a specified period.
Expense ratio	Expenses (all expenses other than commissions) incurred as a percentage of gross written premium charged during a specified period.
Net underwriting result	Gross written premium less claims payments, commissions and expenses as a percentage of gross written premium charged during a specified period; excludes investment income earned on held premiums.
<b>Insurance coverage - Journey</b>	
Change fee	Reimbursement of fees and additional expenses to change dates of travel.
Missed connection	Reimbursement of replacement ticket or expenses to change ticket if transport company causes policyholder to miss connecting transport.
Provider insolvency	Reimbursement of incurred expenses if travel service provider becomes insolvent.
Resumption of trip	Reimbursement of expenses to resume trip subsequent to a trip interruption.
Travel delay	Reimbursement of additional expenses if transport is delayed, cancelled or overbooked.
Trip cancellation	Reimbursement of unused, non-refundable or prepaid expenses if the trip is cancelled.
Trip interruption	Reimbursement of unused, non-refundable or prepaid portion of expenses if trip is interrupted or is ended earlier and of any increase in return transportation costs.
<b>Insurance coverage - Baggage &amp; personal effects</b>	
Baggage delay	Reimbursement of expenses resulting from purchase of essential items if baggage is delayed or misdirected.
Baggage theft, loss or damage	Compensation if baggage is stolen, lost or damaged.
Personal belongings theft, loss or damage	Compensation if personal belongings such as electronic equipment, gadgets, jewellery or other items not considered as luggage are stolen, lost or damaged.
Sporting equipment theft, loss or damage	Compensation if sporting equipment is stolen, lost or damaged.
Travel & personal documents	Reimbursement of expenses resulting from the replacement of travel and personal documents, including tickets, traveller cheques, passport, ID card, credit card, driver license, etc.
Theft of cash	Compensation if cash is stolen.
<b>Insurance cover - Medical</b>	
Dental	Reimbursement of expenses resulting from urgent and immediate treatment by a dentist due to an injury, infection, lost filling, broken tooth, etc.
Emergency medical transport	Emergency transport to a medical facility.
Hospitalisation	Reimbursement of expenses from surgery or medical treatment in a hospital or clinic either as an inpatient or outpatient.
Illness & injury	Reimbursement of expenses resulting from illness or injury requiring urgent medical treatment or hospitalisation.
Personal support & accompaniment	Reimbursement of expenses for a friend or close relative to support and accompany policyholder in hospital and during repatriation.
Prescribed medicines	Reimbursement of cost of medicines prescribed by an authorized doctor or dentist.
Repatriation	Repatriation home following an illness or injury.
<b>Insurance cover - Other</b>	
24/7 hotline assistance	Permanent assistance via telephone available 24 hours a day.
Accidental death & dismemberment	Compensation if an accident results in death, dismemberment, disability or serious injury.
Coverage for pre-existing medical conditions	Exclusion waiver for pre-existing medical conditions.
Legal assistance	Provision of legal aid from qualified lawyer in case of criminal, civil or administrative liability.
Non-medical evacuation	Evacuation to a safe place due to war, terrorism or natural disaster.
Personal liability - physical injury or property damage	Reimbursement or payment of legal liability and defence costs from physical injury or property damage caused to a third party.
Rental vehicle insurance excess	Reimbursement or payment of excess of rental car insurance.
Roadside assistance	Transport to garage, reimbursement of additional travel costs if car breaks down.
<b>Product offering approach</b>	
Modular product architecture	Approach whereby the policyholder is able to tailor his policy by selecting from a significant range of pre-set coverages, resulting in individualised insurance policies.
Standard packaged product approach	Approach whereby the insurance undertaking offers pre-designed products which vary by coverage type, limit etc. In this approach it is common for products to range from those providing basic coverage to those providing comprehensive coverage. Product are often named using terms suggestive of the level of coverage (e.g. bronze, silver, gold).
<b>Travel insurance policy</b>	
Single trip	Insurance policy providing coverage for a specific trip and is matched to the exact characteristic of the trip (e.g. number of travelling days and destination).
Long stay	Insurance policy providing coverage for long uninterrupted stays abroad, for instance for students studying abroad and typically for medical costs only. Note: these products are not in scope of the thematic review.
Multi-trip	Insurance policy also known as annual plans, providing coverage for multiple trips during a calendar year.
<b>Complaint</b>	
	Formal written expression (including in electronic mode) of dissatisfaction submitted to regulators regarding the provision of, or failure to provide a service or a product of the insurance undertaking.
<b>Claims denied</b>	
	Claims submitted by the policyholder and fully processed by the insurance undertaking which have ended without payment to the policyholder. For the purpose of the thematic review, only claims completely denied should be considered as claims denied. Claims partially denied should not be considered as claims denied.
<b>Deductible</b>	
	Amount of money (fixed amount or percentage of claim) the policyholder is responsible for and which must be paid in an insurance claim and which the insurance company will deduct from the claim payment.
<b>Gross written premium</b>	
	The total premium on insurance underwritten by the insurance undertaking during a specified period, before deduction of reinsurance premium.
<b>Insurance overlap</b>	
	Situation where the policyholder has two or more policies covering the same risk. E.g. double insurance where two policies cover the same risk.
<b>Over-insurance</b>	
	Situation where the level of cover a policyholder has is higher than needed. E.g. coverage for more than the value of item that is insured.
<b>Under-insurance</b>	
	Situation where the level of cover a policyholder has is inadequate and lower than needed. E.g. coverage for less than the value of item that is insured.

## Business Model Background

The travel insurance market has seen an increase in sales through digital and remote channels complementing more traditional distribution channels. In addition, transport companies with large customer bases and direct client interface, such as airlines, have entered the travel insurance industry, mostly in distribution.

This trend may be further boosted as online travel specialists<sup>1</sup> play an increasingly role as distributors of travel insurance and if large technological/internet companies<sup>2</sup> decide to enter the travel insurance market, at least as a first step, in distribution. Companies in other sectors with a distribution network and a large pool of clients (e.g. supermarket chains) are also potential contenders to entering the market as distributors.

Of potential significance for consumers, insurance undertakings and the market as a whole, is the business model used by large players in travel insurance distribution. Rather than operating as conventional insurance intermediaries, they may operate as business originators and leverage their large customer base and market power when setting the terms of the distribution agreement with insurance undertakings. Insurance undertakings have highlighted to EIOPA that some of these new entrants set upfront their (unnegotiable) commission rates when putting up their distribution business for tender among various insurance undertakings.

A key issue is whether this trend will change the dynamics of the market and create new sources of consumer detriment or increase the scale of existing ones.

### Notes

1 - E.g. Bookings.com, TripAdvisor, Expedia or Trivago.

2 - E.g. GAFAs (Google, Amazon, Facebook and Apple)

## IDD Background

The Insurance Distribution Directive (IDD)<sup>1</sup> extends the scope of regulated entities captured beyond its predecessor, the Insurance Mediation Directive, by covering direct writers and entities that distribute insurance products on an ancillary basis. The aim is to promote a level playing field and competition on equal terms between different distribution channels and a consistent level of consumer protection.<sup>2</sup>

Under the IDD, the term "ancillary insurance intermediary" refers to natural or legal persons whose main business is not insurance-related who, for remuneration on an ancillary basis, take up or pursue insurance or reinsurance distribution as a secondary activity.

To qualify as an ancillary insurance intermediary, the person or entity must satisfy all the conditions set out in Article 2(1)(4) of the IDD.<sup>3</sup> In particular, banks and investment firms cannot be ancillary insurance intermediaries.

Certain ancillary insurance intermediaries may, however, be exempted from the scope of the IDD under certain conditions. The exemption under Article 1(3), IDD applies when:

- (a) the insurance is complementary to the good or service supplied by a provider and where that insurance covers:
  - (i) the risk of breakdown, loss of, or damage to, the good or the non-use of the service supplied by that provider; or
  - (ii) damage to, or loss of, baggage and other risks linked to travel booked with that provider;
- (b) the amount of the premium paid for the insurance product must not exceed €600 calculated on a pro rata annual basis;
- (c) by way of derogation from the above limit, the exemption may also apply when the amount of the premium paid per person does not exceed €200 where the duration of that service is equal to, or less than, three months.

However, to ensure that an adequate degree of consumer protection is always attached to the activity of insurance distribution and that consumers benefit from the same level of protection regardless of the distribution channel, the IDD sets out specific provisions which apply to insurance undertakings and insurance intermediaries when specifically carrying out the distribution activity through an ancillary insurance intermediary who is exempted from the requirements set out in the IDD.

These provisions, as set out in Article 1(4) of the IDD, require the insurance undertaking or the insurance intermediary using an ancillary insurance intermediary to provide information prior to the conclusion of the contract, including the Insurance Product Information Document (IPID), the identity and address of the insurance undertaking and the procedure to lodge complaints.

Furthermore, insurance undertakings must have in place appropriate and proportionate arrangements to comply with certain conduct of business rules when distributing travel insurance through ancillary insurance intermediaries who are exempted from the application of the IDD. These include the principle to consider the demands and needs of customers when offering insurance products and the general duty to act honestly, fairly and professionally in accordance with the best interests of their customers (Article 17(1) of the IDD) and to provide fair, clear and not misleading information (Article 17(2) of the IDD). Insurance undertakings are also required to comply with the IDD provisions applicable to cross-selling (Article 24 of the IDD) when the insurance policy is sold together with an ancillary service or product or where the insurance product is ancillary to a good or service which is not insurance. This last situation is particularly

### Notes

1 - Directive (EU) 2016/97 of the European Parliament and of the Council of 20 January 2016 on insurance distribution; available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016L0097&from=en>.

2 - Recital 16 of the IDD.

3 - "Ancillary insurance intermediary" means any natural or legal person, other than a credit institution or an investment firm as defined in points (1) and (2) of Article 4(1) of Regulation (EU) No 575/2013 of the European Parliament and of the Council (1), who, for remuneration, takes up or pursues the activity of insurance distribution on an ancillary basis, provided that all the following conditions are met:

- (a) the principal professional activity of that natural or legal person is other than insurance distribution;
- (b) the natural or legal person only distributes certain insurance products that are complementary to a good or service;
- (c) the insurance products concerned do not cover life assurance or liability risks, unless that cover complements the good or service which the intermediary provides as its principal professional activity.

## Section A: Business Model

Please provide answers with reference to your travel insurance business. Please provide data for your entire non-life insurance business, where required.

Please refer to the Definitions worksheet for an explanation of the terms used.

Please refer to Business Model Background worksheet for further detail.

### Question A1 - Changes to business models

In your view, were there major changes to the travel insurance business model and value chain over the recent past? In your response indicate the main drivers of change (e.g. new trade opportunities, new technologies, changing consumer preferences, competitive environment, etc.), challenges, opportunities and expected developments.

### Question A2 - Impact and risks

How do you think the distribution models/arrangements described in the Business Model Background worksheet impact on and are a risk for:

a) the insurance undertaking

b) other insurance distributors not using such distribution models/arrangements

c) consumers

**Question A3 - Past experience**

Please share with us your experience with the distribution models/arrangements described in the Business Model Background worksheet.

**Question A4 - Tendering processes**

Has the insurance undertaking participated in any tendering processes as described in the Business Model Background worksheet over the last three years, i.e., where distributors set upfront their commission rates when putting up their distribution business for tender among various insurance undertakings?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

If you answered yes, please provide details of the tender process(es) in the comment box below. Please indicate the type of distributor(s) and the level of any pre-specified commission level(s) set upfront.

**Question A5 - Financial ratios (2017)**

In the table below indicate the financial ratios for travel insurance business and for your entire non-life insurance business with reference to 2017.

	Travel insurance	Non-life
Claims ratio		
Commission ratio		
Expense ratio		
Net underwriting result		

**Additional comments**

(please provide comments or additional explanations in the comment box below)

**Trends in financial ratios (2015-2017)**

Were there any observable trends during the 2015-2017 period regarding financial ratios? In your response indicate overall trends (e.g. increase or decrease).

## Section B: Distribution

In your response please distinguishing between single trip and multi-trip products and distribution channels, where required. Please provide data for your entire non-life insurance business, where required. If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" columns. Where this is the case, indicate it in the relevant comment box.

If you are unable to provide data split by distribution channel, please insert data in the "All distribution channels" rows. Additionally, provide an approximation or estimate where available, indicating where this is the case in the relevant comment box. If no data, approximations or estimates are available, where possible, indicate which distribution channels you believe to have the highest and lowest values.

To avoid double counting allocate insurance distributors to a single distribution channel. Where such choices are made, please provide details in the relevant comment box.

Please refer to the Definitions worksheet for an explanation of the terms used.

### Question B1 - Gross written premium per distribution channel (2017)

In the table below indicate the value of gross written premium in 2017 per distribution channel (in EUR 000's).

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

If you are unable to provide data split by distribution channel, please insert data in the "All distribution channels" row. Additionally, provide an approximation or estimate if available, indicating this in the comment box. If no data, approximations or estimates are available, where possible, indicate which distribution channels you believe to have the highest and lowest values.

To avoid double counting allocate insurance distributors to a single distribution channel. If this is the case, please provide details in the comment box.

	Single trip	Multi-trip	All products
Direct sales			
Bancassurance			
Insurance agent / insurance broker			
Comparison website / aggregator			
Ancillary insurance intermediary (total)			
Other distribution channel <sup>1</sup>			
<b>All distribution channels</b>			
<b>Ancillary insurance intermediary break up<sup>2</sup></b>			
Online travel specialist			
Travel agent / tour operator			
Transport company			
Other ancillary insurance intermediary <sup>1</sup>			

#### Additional comments

(please provide comments or additional explanations in the comment box below)

### Trends in gross written premium per distribution channel (2015-2017)

Were there any observable trends during the 2015-2017 period regarding gross written premium per distribution channel? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

### Question B2 - Number of new policies per distribution channel (2017)

In the table below indicate the number of new policies underwritten per distribution channel in 2017.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

If you are unable to provide data split by distribution channel, please insert data in the "All distribution channels" row. Additionally, provide an approximation or estimate if available, indicating this in the comment box. If no data, approximations or estimates are available, where possible, indicate which distribution channels you believe to have the highest and lowest values.

To avoid double counting allocate insurance distributors to a single distribution channel. If this is the case, please provide details in the comment box.

	Single trip	Multi-trip	All products
Direct sales			
Bancassurance			
Insurance agent / insurance broker			
Comparison website / aggregator			
Ancillary insurance intermediary (total)			
Other distribution channel <sup>1</sup>			
<b>All distribution channels</b>			
<b>Ancillary insurance intermediary break up<sup>2</sup></b>			
Online travel specialist			
Travel agent / tour operator			
Transport company			
Other ancillary insurance intermediary <sup>1</sup>			

#### Additional comments

(please provide comments or additional explanations in the comment box below)

### Trends in the number of new policies per distribution channel (2015-2017)

Were there any observable trends during the 2015-2017 period regarding the number of new policies per distribution channel? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

**Question B3 - Average commission levels per distribution channel (2017)**

In the table below indicate the unweighted average commission level for new policies underwritten in 2017 per distribution channel in absolute value (in EUR) and as a percentage of the premium. For practical purposes, in the calculations consider the amount of commissions effectively paid in 2017 and premiums effectively received in 2017 even for those policies with termination date after 2017. Policies underwritten in 2016 with termination date in 2017 should not be considered.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

If you are unable to provide data split by distribution channel, please insert data in the "All distribution channels" row. Additionally, provide an approximation or estimate if available, indicating this in the comment box. If no data, approximations or estimates are available, where possible, indicate which distribution channels you believe to have the highest and lowest values.

To avoid double counting allocate insurance distributors to a single distribution channel. If this is the case, please provide details in the comment box.

	Single trip		Multi-trip		All products		Total non-life
	EUR	% premium	EUR	% premium	EUR	% premium	% premium
Direct sales							
Bancassurance							
Insurance agent / insurance broker							
Comparison website / aggregator							
Ancillary insurance intermediary (total)							
Other distribution channel <sup>1</sup>							
<b>All distribution channels</b>							
<b>Ancillary insurance intermediary break up<sup>2</sup></b>							
(a) Online travel specialist							
(b) Travel agent / tour operator							
(c) Transport company							
(d) Other ancillary insurance intermediary <sup>1</sup>							

**Additional comments**

(please provide comments or additional explanations in the comment box below)

**Trends in commission levels per distribution channel (2015-2017)**

Were there any observable trends during the 2015-2017 period regarding the unweighted average commission levels per distribution channel? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

**Question B4 - Dispersion of commission levels per distribution channel (2017)**

In the table below indicate the minimum, the 25<sup>th</sup> percentile, the median, the 75<sup>th</sup> percentile and the maximum commission level for new policies underwritten in 2017 per distribution channel as a percentage of the premium.

For practical purposes, provide your response with reference to all products, not differentiating between single trip and multi-trip policies.

For practical purposes, in the calculations consider the amount of commissions effectively paid in 2017 and premiums effectively received in 2017 even for those policies with termination date after 2017. Policies underwritten in 2016 with termination date in 2017 should not be considered.

If you are unable to provide data split by distribution channel, please insert data in the "All distribution channels" row. Additionally, provide an approximation or estimate if available, indicating this in the comment box. If no data, approximations or estimates are available, where possible, indicate which distribution channels you believe to have the highest and lowest values.

To avoid double counting allocate insurance distributors to a single distribution channel. If this is the case, please provide details in the comment box.

	All products				
	Minimum	25 <sup>th</sup> perc.	Median	75 <sup>th</sup> perc.	Maximum
Direct sales					
Bancassurance					
Insurance agent / insurance broker					
Comparison website / aggregator					
Ancillary insurance intermediary (total)					
Other distribution channel <sup>1</sup>					
<b>All distribution channels</b>					
<b>Ancillary insurance intermediary break up<sup>2</sup></b>					
(a) Online travel specialist					
(b) Travel agent / tour operator					
(c) Transport company					
(d) Other ancillary insurance intermediary <sup>1</sup>					

**Additional comments**

(please provide comments or additional explanations in the comment box below)

**Trends in dispersion of commission levels per distribution channel (2015-2017)**

Were there any observable trends during the 2015-2017 period regarding the dispersion of commission levels per distribution channel? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

**Question B5 - Determinants of commission levels**

Which factors determine the level of commissions?

**Question B6 - Services provided by distributors**

Which activities and services do distributors carry out in relation to the commission earned?

**Question B7 - Justification for commission levels**

Are commission levels justifiable considering the activities and services provided by distributors?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please provide additional explanations in the comment box below.

**Notes**

1 - Please specify in the comment box.

2 - Sum of (a) online travel specialist, (b) travel agent / tour operator, (c) transport company and (d) other ancillary insurance intermediary should equal the value reported for ancillary insurance intermediary (total).

## Section C: Sales Practices

In your response please distinguishing between single trip and multi-trip products and distribution channels, where required.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" columns. Where this is the case, indicate it in the relevant comment box. Please refer to the Definitions worksheet for an explanation of the terms used.

### Question C1 - Gross written premium per type of travel insurance policy (2017)

In the table below indicate the value of gross written premium in 2017 per type of policy (in EUR 000's).

Stand-alone single trip	
Stand-alone multi-trip policy	
Add-on to other products / services	
<b>Total</b>	

#### Additional comments

(please provide comments or additional explanations in the comment box below)

### Trends in gross written premium per type of travel insurance policy (2015-2017)

Were there any observable trends during the 2015-2017 period regarding gross written premium per type of travel insurance policy? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

### Question C2 - Gross written premium per type of policyholder (2017)

In the table below indicate the value of gross written premium in 2017 per type of policyholder (in EUR 000's).

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

	Single trip	Multi-trip	All products
Retail customers			
Corporate customers			
<b>Total</b>			

### Trends in gross written premium per type of policyholder (2015-2017)

Were there any observable trends during the 2015-2017 period regarding gross written premium per type of policyholder? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

### Question C3 - Positive consumer outcomes

How does the insurance undertaking ensure a fair and equitable access to its travel insurance products, ensuring a high level of disclosure and transparency of the terms and conditions?

### Question C4 - Premium calculation

Which factors are taken into account when calculating insurance premiums for single trip and multi-trip products? Please select from the options below (multiple answers possible).

	Single trip	Multi-trip
Customer gender		
Customer age		
Duration of trip		
Destination of trip		
Other <sup>1</sup>		

#### Additional comments

(please provide comments or additional explanations in the comment box below)

**Question C5 - Premium variation**

Do insurance premiums charged to customers vary by distribution channel?

Yes	
No	
Don't know	

If you answered yes, please provide additional explanations in the comment box below.

**Question C6 - Pre-existing medical conditions**

With regards to pre-existing medical conditions:

a) what cover is generally provided/available for consumers with pre-existing medical conditions?

b) are the conditions excluded or is an additional premium charged?

c) what processes are followed for medical screening of consumers with pre-existing medical conditions?

**Question C7 - Insurance overlap and over-insurance**

With regards to insurance overlap and over-insurance:

a) how does the insurance undertaking assess the risk for customers of insurance overlap and over-insurance? Does the insurance undertaking assess the overlap in cover from different policies held by the same policyholder? E.g. through consumer on-boarding procedure such as questioning customers about other insurance policies they may have covering the same risk.

b) when more than one policy cover the same risk, how is loss apportioned among the various insurance undertakings (e.g. pro rata share, applies in excess)? What actions are required from policyholders in the process?

c) does the insurance undertaking have insurance products that are built upon the European Health Insurance Card? How does the insurance undertaking ensure that the customers are aware of this before closing the contract?

**Question C8 - Product complexity<sup>2</sup>**

With regards to product complexity:

a) how does the insurance undertaking assess product complexity?

b) for products assessed by the insurance undertaking as complex, are there any restrictions with regards to sales? E.g. distribution channel, type of customer, etc.

**Question C9 - Communication and advertising**

Does the insurance undertaking have a formal internal approval process for communication and advertising material?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

If you answered yes, please provide additional explanations in the comment box below. Please specify which departments and/or functions are involved in the process.

**Question C10 - Procedures to file a claim**

When and how are customers informed about the procedures to file a claim and the formal requirements in that context (e.g. documentation that must be obtained at the destination)?

**Question C11 - Distribution through ancillary insurance intermediaries**

Where travel insurance products are distributed through ancillary insurance intermediaries:

a) do ancillary insurance intermediaries get any guidelines on how to sell the right product to the right customers? E.g. which category of customers the product is intended. If yes, please provide details in the comment box below.

b) do ancillary insurance intermediaries get any guidelines on how to minimise the risk of insurance overlap, over-insurance and under-insurance?

c) how does the insurance undertaking ensure that customers are not provided with misleading or inadequate information?

d) how does the insurance undertaking ensure that customers are protected from overly aggressive marketing or high-pressure sales?

**Notes**

1 - Please specify in the comment box.

2 - A complex product is a product with characteristics that may be difficult for retail investors to understand.

## Section D: Products

In your response please distinguishing between single trip and multi-trip products and distribution channels, where required. Please provide data for your entire non-life insurance business, where required. If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" columns. Where this is the case, indicate it in the relevant comment box. Please refer to the Definitions worksheet for an explanation of the terms used.

### Question D1 - Gross written premium (2015-2017)

In the table below indicate the annual gross written premium for the 2015-2017 period (in EUR 000's).

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

Single trip			Multi-trip			All products			Total non-life		
2015	2016	2017	2015	2016	2017	2015	2016	2017	2015	2016	2017

#### Additional comments

(please provide comments or additional explanations in the comment box below)

### Question D2 - Number of new policies (2015-2017)

In the table below indicate the annual number of new policies underwritten for the 2015-2017 period.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

Single trip			Multi-trip			All products		
2015	2016	2017	2015	2016	2017	2015	2016	2017

#### Additional comments

(please provide comments or additional explanations in the comment box below)

### Question D3 - Average premium (2017)

In the table below indicate the unweighted average premium for new policies underwritten in 2017 (in EUR).

In the table below indicate the unweighted average commission level for new policies underwritten in 2017 per distribution channel in absolute value (in EUR) and as a percentage of the premium.

For practical purposes, in the calculations consider the amount of premiums effectively received in 2017 even for those policies with termination date after 2017. Policies underwritten in 2016 with termination date in 2017 should not be considered.

Please distinguish between single trip and multi-trip products. If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column.

Single trip	Multi-trip	All products

#### Additional comments

(please provide comments or additional explanations in the comment box below)

### Question D4 - Approach to product offering

Does the insurance undertaking take a "modular product architecture" or a "standard packaged product approach" to structuring products? Please provide details in the comment box.

A "modular product architecture" is defined as the approach whereby the policyholder is able to tailor his policy by selecting from a significant range of pre-set coverages, resulting in individualised insurance policies.

A "standard packaged product" approach is defined as the approach whereby the insurance undertaking offers pre-designed products that vary by coverage type, limit etc. In this approach it is common for products to range from those providing basic coverage to those providing comprehensive coverage. Product are often named using terms suggestive of the level of coverage (e.g. bronze, silver, gold).

Modular product architecture	
Standard packaged product approach	
Combination of the above	
Other <sup>1</sup>	

#### Additional comments

(please provide comments or additional explanations in the comment box below)

**Question D5 - Number of travel insurance products offered**

Where the insurance undertaking uses a modular product architecture, describe the options (coverages, limits, etc.) available to customers and how policies can be constructed by customers. Is any advice or guidance provide to customers during the process (e.g. basic product with suggested additional coverages)?

**Question D6 - Number of travel insurance products offered<sup>2</sup>**

Where the insurance undertaking uses a standard packaged product approach, in the table below indicate how many travel insurance products the insurance undertaking currently offers.

Please distinguish between single trip and multi-trip products. If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column.

Single trip	Multi-trip	All products

**Additional comments**

(please provide comments or additional explanations in the comment box below)

**Question D7 - Structure of product range**

Where the insurance undertaking uses a standard packaged product approach, how does the insurance undertaking structure its current product range offer? What are the main characteristic and differences among the various products offered? E.g. the product range comprises a basic and a comprehensive product with different covers and limits applicable to each.

**Question D8 - Trends in product offering (2015-2017)**

Has the insurance undertaking's product offering evolved in the 2015-2017 period?

Yes	
No	

If you answered yes, please provide additional explanations in the comment box below. Has the trend been the result of a product diversification strategy (e.g. modifying products so that the new version appeals to a different group of customers) or due to product standardization? Have these changes been motivated by competitive factors (e.g. declining market share, competitors' offers) or motivated by changes in consumer demands?

**Question D9 - Coverage for single trip travel insurance**

Where the insurance undertaking uses a standard packaged product approach, complete the table below with reference to the single trip travel insurance product most sold in 2017 (measured by the number of policies underwritten in 2017).

Coverage	Summary description of benefit	Included as standard (Yes/No)	Available as add-on (Yes/No)	Benefit / Coverage limit <sup>3</sup>	Covered reason (main causes covered)	Deductible value	Additional comments
<b>Journey</b>							
Change fee	Reimbursement of fees and additional expenses to change dates of travel						
Missed connection	Reimbursement of replacement ticket or expenses to change ticket if transport company causes policyholder to miss connecting transport						
Provider insolvency	Reimbursement of incurred expenses if travel service provider becomes insolvent						
Resumption of trip	Reimbursement of expenses to resume trip subsequent to a trip interruption						
Travel delay	Reimbursement of additional expenses if transport is delayed, cancelled or overbooked						
Trip cancellation	Reimbursement of unused, non-refundable or prepaid expenses if the trip is cancelled						
Trip interruption	Reimbursement of unused, non-refundable or prepaid portion of expenses if trip is interrupted or is ended earlier and of any increase in return transportation costs						
<b>Baggage and personal effects</b>							
Baggage delay	Reimbursement of expenses resulting from purchase of essential items if baggage is delayed or misdirected						
Baggage theft, loss or damage	Compensation if baggage is stolen, lost or damaged						
Personal belongings theft, loss or damage	Compensation if personal belongings such as electronic equipment, gadgets, jewellery or other items not considered as luggage are stolen, lost or damaged						
Sporting equipment theft, loss or damage	Compensation if sporting equipment is stolen, lost or damaged						
Travel & personal documents	Reimbursement of expenses resulting from the replacement of travel and personal documents (e.g. tickets, traveller cheques, passport, ID card, credit card, driver license, etc.)						
Theft of cash	Compensation if cash is stolen						
<b>Medical</b>							
Dental	Reimbursement of expenses resulting from urgent and immediate treatment by a dentist due to an injury, infection, lost filling, broken tooth, etc.						
Emergency medical transport	Emergency transport to a medical facility						
Hospitalisation	Reimbursement of expenses from surgery or medical treatment in a hospital or clinic either as an inpatient or outpatient						
Illness & injury	Reimbursement of expenses resulting from illness or injury requiring urgent medical treatment or hospitalisation						
Personal support & accompaniment	Reimbursement of expenses for a friend or close relative to support and accompany policyholder in hospital and during repatriation						
Prescribed medicines	Reimbursement of cost of medicines prescribed by an authorized doctor or dentist						
Repatriation	Repatriation home following an illness or injury						
<b>Other</b>							
24/7 hotline assistance	Permanent assistance via telephone available 24 hours a day						
Accidental death & dismemberment	Compensation if an accident results in death, dismemberment, disability or serious injury						
Coverage for pre-existing medical conditions	Exclusion waiver for pre-existing medical conditions						
Legal assistance	Provision of legal aid from qualified lawyer in case of criminal, civil or administrative liability						
Non-medical evacuation	Evacuation to a safe place due to war, terrorism or natural disaster						
Personal liability - physical injury or property damage	Reimbursement or payment of legal liability and defence costs from physical injury or property damage caused to a third party						
Rental vehicle insurance excess	Reimbursement or payment of excess of rental car insurance						
Roadside assistance	Transport to garage, reimbursement of additional travel costs if car breaks down						

**Additional comments**

(please provide comments or additional explanations in the comment box below)

**Question D10 - Exclusions for single trip travel insurance**

What exclusions are applicable to the single trip travel insurance product most sold in 2017? E.g. pre-existing medical conditions, accidents under the influence of alcohol or drugs, adventure activities, disease outbreaks, civil unrest, war, terrorism, etc.

**Question D11 - Restrictions for single trip travel insurance**

What restrictions are applicable to the single trip travel insurance product most sold in 2017?

**Question D12 - Additional coverage for single trip travel insurance**

Which additional add-on or specialised coverages can be added to the single trip travel insurance product most sold in 2017? E.g. pre-existing medical conditions, "cancel for any reason", etc.

**Question D13 - Coverage for multi-trip travel insurance**

Where the insurance undertaking uses a standard packaged product approach, complete the table below with reference to the multi-trip travel insurance product most sold in 2017 (measured by the number of policies underwritten in 2017).

Coverage	Summary description of benefit	Included as standard (Yes/No)	Available as add-on (Yes/No)	Benefit / Coverage limit <sup>4</sup>	Covered reason (main causes covered)	Deductible value	Additional comments
<b>Journey</b>							
Change fee	Reimbursement of fees and additional expenses to change dates of travel						
Missed connection	Reimbursement of replacement ticket or expenses to change ticket if transport company causes policyholder to miss connecting transport						
Provider insolvency	Reimbursement of incurred expenses if travel service provider becomes insolvent						
Resumption of trip	Reimbursement of expenses to resume trip subsequent to a trip interruption						
Travel delay	Reimbursement of additional expenses if transport is delayed, cancelled or overbooked						
Trip cancellation	Reimbursement of unused, non-refundable or prepaid expenses if the trip is cancelled						
Trip interruption	Reimbursement of unused, non-refundable or prepaid portion of expenses if trip is interrupted or is ended earlier and of any increase in return transportation costs						
<b>Baggage and personal effects</b>							
Baggage delay	Reimbursement of expenses resulting from purchase of essential items if baggage is delayed or misdirected						
Baggage theft, loss or damage	Compensation if baggage is stolen, lost or damaged						
Personal belongings theft, loss or damage	Compensation if personal belongings such as electronic equipment, gadgets, jewellery or other items not considered as luggage are stolen, lost or damaged						
Sporting equipment theft, loss or damage	Compensation if sporting equipment is stolen, lost or damaged						
Travel & personal documents	Reimbursement of expenses resulting from the replacement of travel and personal documents (e.g. tickets, traveller cheques, passport, ID card, credit card, driver license, etc.)						
Theft of cash	Compensation if cash is stolen						
<b>Medical</b>							
Dental	Reimbursement of expenses resulting from urgent and immediate treatment by a dentist due to an injury, infection, lost filling, broken tooth, etc.						
Emergency medical transport	Emergency transport to a medical facility						
Hospitalisation	Reimbursement of expenses from surgery or medical treatment in a hospital or clinic either as an inpatient or outpatient						
Illness & injury	Reimbursement of expenses resulting from illness or injury requiring urgent medical treatment or hospitalisation						
Personal support & accompaniment	Reimbursement of expenses for a friend or close relative to support and accompany policyholder in hospital and during repatriation						
Prescribed medicines	Reimbursement of cost of medicines prescribed by an authorized doctor or dentist						
Repatriation	Repatriation home following an illness or injury						
<b>Other</b>							
24/7 hotline assistance	Permanent assistance via telephone available 24 hours a day						
Accidental death & dismemberment	Compensation if an accident results in death, dismemberment, disability or serious injury						
Coverage for pre-existing medical conditions	Exclusion waiver for pre-existing medical conditions						
Legal assistance	Provision of legal aid from qualified lawyer in case of criminal, civil or administrative liability						
Non-medical evacuation	Evacuation to a safe place due to war, terrorism or natural disaster						
Personal liability - physical injury or property damage	Reimbursement or payment of legal liability and defence costs from physical injury or property damage caused to a third party						
Rental vehicle insurance excess	Reimbursement or payment of excess of rental car insurance						
Roadside assistance	Transport to garage, reimbursement of additional travel costs if car breaks down						

**Additional comments**

(please provide comments or additional explanations in the comment box below)

**Question D14 - Exclusions for multi-trip travel insurance**

What exclusions are applicable to the multi-trip travel insurance product most sold in 2017? E.g. pre-existing medical conditions, accidents under the influence of alcohol or drugs, adventure activities, disease outbreaks, civil unrest, war, terrorism, etc.

**Question D15 - Restrictions for multi-trip travel insurance**

What restrictions are applicable to the multi-trip travel insurance product most sold in 2017?

**Question D16 - Maximum duration of travels**

What is the maximum duration of travels covered by multi-trip travel insurance, i.e. maximum duration of single trip and / or total number of travel days for the duration of the contract?

**Question D17 - Extension of cover for additional trip**

Is it possible to extend multi-trip travel insurance with a single trip insurance if the covered duration of the multi-trip travel under the multi-trip policy is exceeded?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

If you answered yes, please provide additional explanations in the comment box below.

**Question D18 - Additional coverage for multi-trip travel insurance**

Which additional add-on or specialised coverages can be added to the multi-trip travel insurance product most sold in 2017? E.g. pre-existing medical conditions, "cancel for any reason", etc.?

**Question D19 - Impact of fraud on product design**

Does the risk of fraud impact how products are designed (e.g. coverage, restrictions, deductibles, etc.)?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

If you answered yes, please provide additional explanations in the comment box below.

**Question D20 - Impact of fraud on product pricing**

To what extent does fraud impact product pricing?

**Question D21 - Fraud prevention**

Which measures and procedures does the insurance undertaking have to prevent fraud in travel insurance?

**Notes**

1 - Please specify in the comment box.

2 - Different travel insurance products means product variations that are significantly different regarding their relevant characteristics, such as the coverage or exclusions applied.

3 - In determining the benefit or coverage limit, please consider a male customer aged 40 travelling to the United States of America for one week and a travel package cost of EUR 3.000 (EUR 1.000 for airline fair and EUR 2.500 for hotel accommodation).

4 - In determining the benefit or coverage limit, please consider a male customer aged 40.

## Section E: Claims

In your response please distinguishing between single trip and multi-trip products and distribution channels, where required.

The term "claim", with the exception of claims denied, refers to a claim accepted by the insurance undertaking, that is, a claim that has resulted in compensation being paid to policyholders in 2017. Accordingly, it includes claims accepted in 2016 that have resulted in compensation being paid in 2017 and excludes claims accepted in 2017 but that have resulted into compensation being paid in 2018. If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" columns. Where this is the case, indicate it in the relevant comment box.

If you are unable to provide data split by distribution channel, please insert data in the "All distribution channels" rows. Additionally, provide an approximation or estimate where available, indicating where this is the case in the relevant comment box. If no data, approximations or estimates are available, where possible, indicate which distribution channels you believe to have the highest and lowest values. To avoid double counting allocate insurance distributors to a single distribution channel. Where such choices are made, please provide details in the relevant comment box.

Please refer to the Definitions worksheet for an explanation of the terms used.

### Question E1 - Number of claims paid (2017)

In the table below indicate the number of claims paid in 2017 per distribution channel.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

If you are unable to provide data split by distribution channel, please insert data in the "All distribution channels" row. Additionally, provide an approximation or estimate if available, indicating this in the comment box. If no data, approximations or estimates are available, where possible, indicate which distribution channels you believe to have the highest and lowest values.

To avoid double counting allocate insurance distributors to a single distribution channel. If this is the case, please provide details in the comment box.

	Single trip	Multi-trip	All products
Direct sales			
Bancassurance			
Insurance agent / insurance broker			
Comparison website / aggregator			
Ancillary insurance intermediary (total)			
Other distribution channel <sup>1</sup>			
<b>All distribution channels</b>			
<b>Ancillary insurance intermediary break up<sup>2</sup></b>			
Online travel specialist			
Travel agent / tour operator			
Transport company			
Other ancillary insurance intermediary <sup>1</sup>			

#### Additional comments

(please provide comments or additional explanations in the comment box below)

### Trends in the number of claims paid (2015-2017)

Were there any observable trends during the 2015-2017 period regarding the number of claims paid per distribution channel? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

### Question E2 - Total value of claims paid (2017)

In the table below indicate the total value of claims paid in 2017 per distribution channel (in EUR 000's).

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

If you are unable to provide data split by distribution channel, please insert data in the "All distribution channels" row. Additionally, provide an approximation or estimate if available, indicating this in the comment box. If no data, approximations or estimates are available, where possible, indicate which distribution channels you believe to have the highest and lowest values.

To avoid double counting allocate insurance distributors to a single distribution channel. If this is the case, please provide details in the comment box.

	Single trip	Multi-trip	All products
Direct sales			
Bancassurance			
Insurance agent / insurance broker			
Comparison website / aggregator			
Ancillary insurance intermediary (total)			
Other distribution channel <sup>1</sup>			
<b>All distribution channels</b>			
<b>Ancillary insurance intermediary break up<sup>2</sup></b>			
Online travel specialist			
Travel agent / tour operator			
Transport company			
Other ancillary insurance intermediary <sup>1</sup>			

#### Additional comments

(please provide comments or additional explanations in the comment box below)

### Trends in the total value of claims paid (2015-2017)

Were there any observable trends during the 2015-2017 period regarding the total value of claims paid per distribution channel? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

### Question E3 - Number of claims paid per type of coverage (2017)

In the table below indicate the number of claims paid in 2017 per type of coverage.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

Please refer to the Definitions worksheet for the coverages included in the 4 coverage clusters: travel, baggage and personal effects, medical and other.

	Single trip	Multi-trip	All products
Journey			
Baggage and personal effects			
Medical			
Other <sup>1</sup>			
<b>Total</b>			

#### Additional comments

(please provide comments or additional explanations in the comment box below)

### Trends in the number of claims paid per type of coverage (2015-2017)

Were there any observable trends during the 2015-2017 period regarding the number of claims paid per type of coverage? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per coverage type or distribution channel.

**Question E4 - Total value of claims paid per type of coverage (2017)**

In the table below indicate the total value of claims paid in 2017 per type of coverage (in EUR 000's).

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

Please refer to the Definitions worksheet for the coverages included in the 4 coverage clusters: travel, baggage and personal effects, medical and other.

	Single trip	Multi-trip	All products
Journey			
Baggage and personal effects			
Medical			
Other <sup>1</sup>			
<b>Total</b>			

**Additional comments**

(please provide comments or additional explanations in the comment box below)

**Trends in the total value of claims paid per type of coverage (2015-2017)**

Were there any observable trends during the 2015-2017 period regarding the total value of claims paid per type of coverage? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per coverage type or distribution channel.

**Question E5 - Number of claims denied per distribution channel (2017)**

In the table below indicate the annual number of claims denied in 2017 per distribution channel.

For the purpose of the thematic review, only claims completely denied should be considered as claims denied. Claims partially denied should not be considered as claims denied.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

If you are unable to provide data split by distribution channel, please insert data in the "All distribution channels" row. Additionally, provide an approximation or estimate if available, indicating this in the comment box. If no data, approximations or estimates are available, where possible, indicate which distribution channels you believe to have the highest and lowest values.

To avoid double counting allocate insurance distributors to a single distribution channel. If this is the case, please provide details in the comment box.

	Single trip	Multi-trip	All products
Direct sales			
Bancassurance			
Insurance agent / insurance broker			
Comparison website / aggregator			
Ancillary insurance intermediary (total)			
Other distribution channel <sup>1</sup>			
<b>All distribution channels</b>			
<b>Ancillary insurance intermediary break up<sup>2</sup></b>			
Online travel specialist			
Travel agent / tour operator			
Transport company			
Other ancillary insurance intermediary <sup>1</sup>			

**Additional comments**

(please provide comments or additional explanations in the comment box below)

**Trends in the number of claims denied per distribution channel (2015-2017)**

Were there any observable trends during the 2015-2017 period regarding the number of claims denied per distribution channel? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

**Question E6 - Number of claims denied per type of coverage (2017)**

In the table below indicate the number of claims denied in 2017 per type of coverage.

For the purpose of the thematic review, only claims completely denied should be considered as claims denied. Claims partially denied should not be considered as claims denied.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

Please refer to the Definitions worksheet for the coverages included in the 4 coverage clusters: travel, baggage and personal effects, medical and other.

	Single trip	Multi-trip	All products
Journey			
Baggage and personal effects			
Medical			
Other <sup>1</sup>			
<b>Total</b>			

**Additional comments**

(please provide comments or additional explanations in the comment box below)

**Trends in the number of claims denied per type of coverage (2015-2017)**

Were there any observable trends during the 2015-2017 period regarding the number of claims denied per type of coverage? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

**Question E7 - Number of claims denied per reason (2017)**

In the table below indicate the number of claims denied in 2017 per reason.

For the purpose of the thematic review, only claims completely denied should be considered as claims denied. Claims partially denied should not be considered as claims denied.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

	Single trip	Multi-trip	All products
Pre-existing medical condition			
Other exclusions in cover <sup>2</sup>			
Exceeded age			
Exceeded maximum duration of trip			
Insufficient documentation			
Disregarded claims instructions <sup>3</sup>			
Other <sup>1</sup>			
<b>Total</b>			

**Additional comments**

(please provide comments or additional explanations in the comment box below)

**Trends in the number of claims denied per reason (2015-2017)**

Were there any observable trends during the 2015-2017 period regarding the number of claims denied per reason? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

**Question E8 - Explanations for claims settled**

When claims are settled, does the insurance undertaking provide policyholders an explanation of the settlement?

Yes	
No	

If you answered yes, please provide additional explanations in the comment box below.

**Question E9 - Explanations for claims denied**

When claims are denied, does the insurance undertaking provide policyholders a justification or explanation for the decision?

Yes	
No	

If you answered yes, please provide additional explanations in the comment box below.

**Notes**

1 - Please specify in the comments box.

2 - Sum of (a) online travel specialist, (b) travel agent / tour operator, (c) transport company and (d) other ancillary insurance intermediary should equal the value reported for ancillary insurance intermediary

3 - E.g. policyholder consults the doctor too late and thus is unable to document his/ her acute illness and ultimately the reason for the trip cancellation.

## Section F: Complaints

In your response please distinguish between single trip and multi-trip products and distribution channels, where required.

The term "complaint" refers to formal written expression (including in electronic mode) of dissatisfaction submitted to regulators regarding the provision of, or failure to provide a service or a product of the insurance undertaking.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" columns. Where this is the case, indicate it in the relevant comment box.

If you are unable to provide data split by distribution channel, please insert data in the "All distribution channels" rows. Additionally, provide an approximation or estimate where available, indicating where this is the case in the relevant comment box. If no data, approximations or estimates are available, where possible, indicate which distribution channels you believe to have the highest and lowest values.

To avoid double counting allocate insurance distributors to a single distribution channel. Where such choices are made, please provide details in the relevant comment box.

Please refer to the Definitions worksheet for an explanation of the terms used.

### Question F1 - Number of complaints (2017)

In the table below indicate the number of complaints in 2017 per distribution channel.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

If you are unable to provide data split by distribution channel, please insert data in the "All distribution channels" row. Additionally, provide an approximation or estimate if available, indicating this in the comment box. If no data, approximations or estimates are available, where possible, indicate which distribution channels you believe to have the highest and lowest values.

	Single trip	Multi-trip	All products
Direct sales			
Bancassurance			
Insurance agent / insurance broker			
Comparison website / aggregator			
Ancillary insurance intermediary (total)			
Other distribution channel <sup>1</sup>			
<b>Total</b>			
<b>Ancillary insurance intermediary break up<sup>2</sup></b>			
Online travel specialist			
Travel agent / tour operator			
Transport company			
Other ancillary insurance intermediary <sup>1</sup>			

#### Additional comments

(please provide comments or additional explanations in the comment box below)

#### Trends in the number of complaints (2015-2017)

Were there any observable trends during the 2015-2017 period regarding the number of complaints per distribution channel? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per distribution channel.

### Question F2 - Number of complaints per type of coverage (2017)

In the table below indicate the number of complaints in 2017 per type of coverage.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" column. If this is the case, indicate it in the comment box.

Please refer to the Definitions tab for the coverages included in the 4 coverage clusters: travel, baggage and personal effects, medical and other.

	Single trip	Multi-trip	All products
Journey			
Baggage and personal effects			
Medical			
Other <sup>1</sup>			
<b>Total</b>			

#### Additional comments

(please provide comments or additional explanations in the comment box below)

#### Trends in the number of complaints per type of coverage (2015-2017)

Were there any observable trends during the 2015-2017 period regarding the number of complaints per type of coverage? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per coverage type or distribution channel.

**Question F3 - Number of complaints per reason (2017)**

In the table below indicate the number of complaints per reason in 2017.

If you are unable to provide data split between single trip and multi-trip products, please insert data in the "All products" columns. If this is the case, indicate it in the comment box.

If you are unable to provide data split by reason according to the classification used, please indicate the top 5 reasons for complaints and indicate the respective number of complaints per your named reason in the comment box.

	Single trip	Multi-trip	All products
Administration and customer service			
Advising, selling and arranging			
Claims			
Commission, charges and premiums			
Terms and conditions (total)			
Other <sup>2</sup>			
<b>Total</b>			
<b>Terms and conditions break up<sup>3</sup></b>			
(a) Unwanted coverage			
(b) Excessive exclusions due to pre-existing medical conditions			
(c) Excessive exclusions other than pre-existing medical conditions			
(d) Other terms and conditions			

**Additional comments**

(please provide comments or additional explanations in the comment box below)

**Trends in the number of complaints per reason (2015-2017)**

Were there any observable trends during the 2015-2017 period regarding the number of complaints per reason? In your response indicate overall trends (e.g. increase or decrease) and provide details of any significant change per coverage type or distribution channel.

**Question F4 - Analysis of complaints**

Does the insurance undertaking have formal processes to analyse, on an on-going basis, complaints data?

Yes	
No	

If you answered yes, please provide additional explanations in the comment box below. In your response indicate which elements, factors or metrics are considered.

**Question F5 - Internal follow-up to complaints**

Where recurring or systemic problems have been identified through complaint analysis, which specific measures has the insurance undertaking taken in the past? Please select from the options below (multiple answers possible).

Modify product(s)	
Withdraw product(s) from the market	
Pay redress or compensation to policyholders	
Review distribution channels and/or distribution arrangements	
Terminated relationship with distributor	
Withdraw from specific distribution channel	
Review sales practices	
Review claims-handling procedures	
Review complaints-handling procedures	
Review other administrative procedures	
Other <sup>1</sup>	

Please provide details in the comment box below. In your response provide examples of specific cases.

**Notes**

1 - Please specify in the comment box.

2 - Sum of (a) online travel specialist, (b) travel agent / tour operator, (c) transport company and (d) other ancillary insurance intermediary should equal the value reported for ancillary insurance intermediar

3 - Sum of (a) unwanted coverage, (b) excessive exclusions due to pre-existing medical conditions, (c) excessive exclusions other than pre-existing medical conditions and (d) other terms and conditions should equal the value reported for terms and conditions (total).

## Section G: IDD application

In your response, please enable us to understand the arrangements the insurance undertaking has or plans to introduce to apply the national provisions implementing the IDD which concern carrying out distribution through ancillary insurance intermediaries who are exempted from the application of the IDD.

The purpose of this section is not to assess the level of compliance. The purpose is to consider best practices which may provide guidance to insurance undertakings in implementing the IDD.

In your response, please specify whether the arrangements are already in place or are planned and any difficulties with their existing or planned application.

Please refer to IDD Background worksheet for further detail.

### Question G1 - IDD measures

When carrying out a distribution activity through an ancillary insurance intermediary who is exempted from the application of the IDD under your national provisions implementing Article 1(3)<sup>1</sup> of the IDD, please specify the arrangements the insurance undertaking has or plans to introduce, in line with national provisions, to ensure that:

a) information is made available to the customer regarding the identity and address of the insurance undertaking and the procedure to lodge complaints, prior to the conclusion of the contract<sup>2</sup>

b) the customer is provided with the Insurance Product Information Document IPID, prior to the conclusion of the contract<sup>3</sup>

c) arrangements are in place to comply with the duty to act honestly, fairly and professionally in accordance with the best interests of their customers, as set out in Article 17(1) of the IDD<sup>4 5</sup>

d) arrangements are in place to comply with the duty to provide fair, clear and not misleading information, as set out in Article 17(2) of the IDD<sup>4 6</sup>

e) ancillary insurance intermediaries are not remunerated or do not remunerate or assess the performance of their employees in a way that conflicts with their duty to act in accordance with the best interests of their customers or that could provide an incentive to recommend a particular insurance product to a customer, as set out in Article 17(3) of the IDD)<sup>4 7</sup>

f) arrangements are in place to consider the demands and needs of the customer, prior to the proposal of the contract<sup>4</sup>

g) arrangements are in place to inform the customer whether it is possible to buy the different components separately and the cost of each component when the insurance product is offered as part of the package, as set out in Article 24(1) of the IDD)<sup>4 8</sup>

h) Arrangements are in place to inform the customer about the different components of the agreement or package, as set out in Article 24(2) of the IDD)<sup>4 9</sup>

i) arrangements are in place to offer the customer the possibility of buying the primary good or service separately, as set out in Article 24(3) of the IDD)<sup>4 10</sup>

**Additional comments**

(please provide comments or additional explanations in the comment box below)

## Notes

1 - IDD, Article 1(3) of the IDD: This Directive shall not apply to ancillary insurance intermediaries carrying out insurance distribution activities where all the following conditions are met:

- (a) the insurance is complementary to the good or service supplied by a provider, where such insurance covers:
  - (i) the risk of breakdown, loss of, or damage to, the good or the non-use of the service supplied by that provider; or
  - (ii) damage to, or loss of, baggage and other risks linked to travel booked with that provider;
- (b) the amount of the premium paid for the insurance product does not exceed EUR 600 calculated on a pro rata annual basis;
- (c) by way of derogation from point (b), where the insurance is complementary to a service referred to in point (a) and the duration of that service is equal to, or less than, three months, the amount of the premium paid per person does not exceed EUR 200.

2 - Article 1(4)(a) of the IDD: information is made available to the customer, prior to the conclusion of the contract, about its identity and address and about the procedures referred to in Article 14 allowing customers and other interested parties to lodge complaints.

3 - Article 1(4)(c) of the IDD: the insurance product information document referred to in Article 20(5) is provided to the customer prior to the conclusion of the contract.

4 - Article 1(4)(b) of the IDD: appropriate and proportionate arrangements are in place to comply with Articles 17 and 24 and to consider the demands and needs of the customer before the proposal of the contract.

5 - Article 17(1) of the IDD: Member States shall ensure that, when carrying out insurance distribution, insurance distributors always act honestly, fairly and professionally in accordance with the best interests of their customers.

6 - Article 17(2) of the IDD: without prejudice to Directive 2005/29/EC of the European Parliament and of the Council (1), Member States shall ensure that all information related to the subject of this Directive, including marketing communications, addressed by the insurance distributor to customers or potential customers shall be fair, clear and not misleading. Marketing communications shall always be clearly identifiable as such.

7 - Article 17(3) of the IDD: Member States shall ensure that insurance distributors are not remunerated or do not remunerate or assess the performance of their employees in a way that conflicts with their duty to act in accordance with the best interests of their customers. In particular, an insurance distributor shall not make any arrangement by way of remuneration, sales targets or otherwise that could provide an incentive to itself or its employees to recommend a particular insurance product to a customer when the insurance distributor could offer a different insurance product which would better meet the customer's needs.

8 - Article 24(1) of the IDD: when an insurance product is offered together with an ancillary product or service which is not insurance, as part of a package or the same agreement, the insurance distributor shall inform the customer whether it is possible to buy the different components separately and, if so, shall provide an adequate description of the different components of the agreement or package as well as separate evidence of the costs and charges of each component.

9 - Article 24(2) of the IDD: in the circumstances referred to in paragraph 1, and where the risk or the insurance coverage resulting from such an agreement or package offered to a customer is different from that associated with the components taken separately, the insurance distributor shall provide an adequate description of the different components of the agreement or package and the way in which their interaction modifies the risk or the insurance coverage.

10 - Article 24(3) of the IDD: where an insurance product is ancillary to a good or a service which is not insurance, as part of a package or the same agreement, the insurance distributor shall offer the customer the possibility of buying the good or service separately. This paragraph shall not apply where an insurance product is ancillary to an investment service or activity as defined in point 2 of Article 4(1) of Directive 2014/65/EU, a credit agreement as defined in point 3 of Article 4 of Directive 2014/17/ EU of the European Parliament and of the Council, or a payment account as defined in point 3 of Article 2 of Directive 2014/92/EU of the European Parliament and of the Council.