

Review of Consumer Trends Methodology

Introduction

According to Article 9 (1)(a) of the Regulation establishing EIOPA, the Authority "shall take a leading role in promoting transparency, simplicity and fairness in the market for consumer financial products or services across the internal market, including by: ... (b) collecting, analysing and reporting on consumer trends".

In addition, under "Tasks and powers of the Authority" according to Article 8, the "Authority shall have the following tasks: ... (h) to foster the protection of policyholders, pension scheme members and beneficiaries".

Moreover, Article 35 of the same Regulation provides a general basis for the collection of information. At the request of EIOPA, National Supervisory Authorities (NSAs) "shall provide [EIOPA] with all necessary information to carry out the duties assigned to it by this Regulation, provided that they have legal access to the relevant information and that the request for information is necessary in relation to the nature of the duty in question".

To meet the above objectives, in order to develop a regular consumer trends report for the insurance sector, EIOPA has developed a methodology for producing the annual Consumer Trends Reports. It is intended that consumer trends will be used on an ongoing basis to identify key consumer protection issues and inform the work of EIOPA and NSAs.

A Methodology sub-group was formed by the Committee on Consumer Protection and Financial Innovation (CCPFI) in early 2012 to develop a methodology for collecting, analysing and reporting on consumer trends. The work of this sub-group culminated in the publication by EIOPA in December 2012 of the "Methodology Report for Collecting, Analysing and Reporting on Consumer Trends" (methodology report).

From the outset the methodology report recognised that there would be significant shortcomings in the data that would form the basis for much of the intended annual consumer trends report, as the following extract demonstrates:

"However, there are a number of challenges involved, principally concerning data collection. The sub-group discovered that:

- *The quantitative data available from Member States varies considerably; many Member States do not collect data in all the areas (for example, on advertising); and,*
- *The quantitative data set is **not harmonised**; so even where the data is available, it is not collected and categorised using a harmonised approach.*

To address the first point, EIOPA intends to collect both qualitative data and quantitative data via pre-defined templates, to provide a broader context to its analysis. This will include reports on thematic work conducted by NSAs, in addition to them also being asked to identify the top three consumer protection issues in their respective jurisdiction for the given reporting period. This is designed to capture the experience of Member States especially those with limited available quantitative data. Guidelines and definitions will be issued to NSAs to ensure data will be collated consistently”.

The second point is of more concern given that the effect of this issue is that it will not be possible to more accurately compare and aggregate data sets between Member States (for this year’s trends report) nor compare annual trends (in future trend reports) until such time as all data sets have been more harmonised and validated first.

While the quantitative data set was not fully harmonised, the approved methodology report provided categorisations and definitions for Member States to follow when submitting data to meet the information requirements. Some of the definitions were more detailed than others. In submitting data some Member States did not apply these accurately and/or only provided data where available, or only in available formats, while others did not submit any data at all in some categories; this is consistent with the agreed ‘best efforts’ approach.

Finally, the methodology report, in recognition of the expected shortcomings, suggested a number of issues be considered in the future as set out in the extract below:

“Suggestions for future consideration/next steps

The work stream has identified some issues for further consideration, or steps to be taken after the first year’s experience of collecting, analysing and reporting on consumer trends.

- 1. Review or refine methodology including the templates;*
- 2. Review timeline and actions for future reports;*
- 3. Review the variables used for comparisons, trends identification, and analysis of data on consumer trends;*
- 4. Harmonise data - the previous sections suggest that the use of quantitative evidence can be further improved if Members States would agree on a certain level of harmonisation. Developing common categories for the quantitative templates would help to reduce any inconsistencies in the data,*

and may make it easier for Member States to put their own work into perspective; and

5. *Consider other sources of data.*"

The methodology report envisaged that the above work would be the subject of a review to take place in December 2013/January 2014. Given the synergy to be derived from considering the issues while the 2012 consumer trends report is being written, the review work commenced during the summer with a view to meeting the December 2013/January 2014 deadline.

Issues with data in the current situation

Discussions at the consumer trends sub-group meetings have identified several issues with the collection and quality of data. Many of these were known at the outset, as outlined in the extract above from the methodology report, and are reflected in the commitment to carry out this review. The difficulties encountered with data collection concern two areas in particular:

- **data inconsistencies** due to different definitions applying at national level, inability of NSAs to submit data in accordance with the categorisations, and issues with validation of data submitted¹; and
- **timing difficulties** such that reporting year data was not available, leading to non-submission of data in some cases.

Data inconsistencies in particular lead to problems with harmonisation, which makes meaningful comparisons very difficult. These types of issues indicate a need not only to clearly define what each category of data is and to then report in line with the definition, but also a need to have robust validation arrangements to ensure data is accurate and comparable.

For qualitative data, the number of NSAs that made submissions concerning consumer trends and financial innovation exceeded those that had submissions for thematic review work. This may stem partly from a lack of clarity on what constitutes a thematic review although some NSAs at least interpreted this quite widely. For instance, some reported mystery shopping exercises under this category, others considered financial education measures to be relevant. It

¹ Examples of data inconsistencies include sales data being provided on a "new sales only" basis as well as on a "new sales plus renewals" basis, while some data submissions included sales of wholesale products rather than only sales to consumers. Some submissions incorporated data for insurers/others included retail intermediaries/others used a mix of the two, some included wholesale products when only retail data was requested, some included only new sales/other used all sales etc. Examples of failure to use the categorisations are the relatively large percentage of data falling into the "other" category particularly in the case of sales by number of products, and where travel insurance (a designated separate category) has been included in the "other" category in at least one case.

would be useful to define, or provide concrete examples of, what could be included under each heading to ensure fuller reporting while at the same time ensuring availability/reporting of more comparable data.

Timing issues did result in some NSAs being unable to submit data. It is worth noting that a contributory factor in setting the data submission date is the amount of work that the sub-group has to carry out to determine if data is comparable from one country to the next. If further work could be done on ensuring harmonised comparable data is submitted there should be scope to set a later submission date which could increase the number of submissions made.

The consumer trends sub-group has identified through its work that considerable effort is required to ensure that a consistent comparable report is generated from the submissions made by NSAs. As things stand there is a need to commit substantial resources to rectifying the inconsistencies that are leading to data not being harmonised and ultimately compromising the ability to draw on comparable data for reporting purposes. The sub-group considers that if it is intended to gather significant volumes of quantitative data it would be prudent to consider getting external resources to assist with this definition/harmonisation project, as the required resources may not be available at NSA level. Indeed, EIOPA does not have additional resources to commit to this in 2013.

Additional considerations

A conclusion from the foregoing is that data collection, even in mainstream areas such as sales and complaints handling, is not particularly responsive to changes in consumer behaviour. Given the number of NSAs involved, the different products and markets, and different existing definitions/categorisations, it takes a considerable amount of time and effort to agree and implement harmonised data categories from definition through collection to analysis.

Experience to date suggests that, compared to data collection in areas such as sales and complaints, it is relatively easy to collect qualitative data, in this case on thematic work and consumer trends & financial innovation. While there are surely differences in the way that NSAs go about collecting and assessing the information that leads to their trends/innovation submissions, they clearly have developed a national basis on which they form the opinion or arrive at their submission. Nonetheless, the information is more dynamic and flexible, as can be seen from the way submissions have changed over the period² data has been collected. In addition it is likely that the national bases for arriving at the qualitative data submissions are evolving and changing as time progresses.

Given the differences in the available data and the lack of availability of some types of data, the possibility of supporting quantitative data with qualitative data

² For consumer trends two rounds of submissions have been received. For the quantitative work on sales and complaints, and for thematic work, only one round of submissions has been made.

was explored, and vice versa. The real difficulty in trying to have one type of data support the other is that the two main types of data, i.e. quantitative and qualitative, are not synchronised, nor can they be as outlined earlier. While it would be possible, albeit time-consuming and costly, to identify quantitative data metrics that support individual trends or financial innovations, the landscape for the qualitative issues will inevitably change over relatively short time horizons. In this scenario it is likely that the quantitative data metrics required at any given point in time to support the qualitative data will be changing. Accordingly, it is difficult to see how the quantitative data metrics can keep pace with the qualitative data. Indeed, it is the nature of a trend that it should be measured over time and this is at odds with the more dynamic experience with qualitative data. Thus, it can indeed be argued that the two types of data, quantitative and qualitative, are not compatible although they are complementary. The only way to support the qualitative data in a systematic way is to identify the qualitative issue for which quantitative data is required and then seek individual data to back this up. Given the effort required to redefine quantitative data metrics and amend reporting systems used to obtain the data from insurance undertakings, this is not a practical or realistic solution. Indeed, to adopt this approach would inevitably mean that consistent quantitative data would not be collected from year to year with which to measure quantitative data trends over a number of years. The conclusion, therefore, as stated in the executive summary of the original methodology report, is that it is not reasonable to expect direct, consistent supporting links between quantitative data and qualitative data but they are considered to be complementary to each other and provide a broad basis on which to assess consumer trends.

While a trend cannot be observed in one year's data, the consumer trends sub-group used the 2012 reported data to assess the likelihood of quantitative data series supporting qualitative data submissions in any given year. The sub-group believes that in the case of sales there may be very limited linkage to qualitative data and complaints data may also only support the data in some circumstances. Indeed for 2012, the sub-group felt that none of the top three consumer trends or financial innovations could be supported by the sales or complaints data.

In spite of the foregoing analysis, there is a role for collecting quantitative data although it is expected to have a quite limited application at the moment, until greater harmonisation is achieved and data for more years have been collected to facilitate trends measurement. Quantitative data provides evidence-based retrospective data on sales and complaints issues. Qualitative data by comparison (using thematic reviews and top 3 issues) identifies issues which may not be captured in the quantitative data. Thus, they may complement each other rather than providing direct support for each other.

Monitoring of a small number of core quantitative data might, as well as potentially giving some support to individual qualitative trends, act as a safety net to prevent missing obvious changes in these areas.

Options for enhancing existing data submissions

Many of the identified issues could be rectified by more rigorous definitions of the data to be reported across the different categories covered by the existing consumer trends templates. This approach would require **a shift from the provision of information on a best efforts basis, as currently is the case, to a situation where clear parameters and definitions are set out for data sets and NSAs report in line with these definitions.** This would inevitably require considerable additional time and effort in adapting reporting mechanisms at NSAs and local insurance undertakings, with additional associated costs. Several consumer trends sub-group members commented that the time and resource implications would need to be considered carefully, since this would be resource-intensive work. The consumer trends sub-group would not have the resources to complete this work and additional resources would be required to achieve this goal. In view of the obstacles this approach is not recommended at this time.

Alternatively, and to overcome these difficulties, NSAs could be requested to concentrate on ensuring that accurate data is submitted on a smaller number of data categories currently available to a significant number of NSAs. For example, sales data might only be collected for value of contracts rather than number of contracts, or complaints data might only be collected for product types rather than causes of complaints. While some work on definitions would be required this should deal with the data inconsistency issues, especially as work would be concentrated on a smaller number of data. Lack of availability of data in some countries will remain an issue but these countries could be encouraged to move towards providing the required data within an agreed realistic timeline that takes account of the workload and resource constraints that exist in NSAs. Although this approach would probably be easier to achieve it is not recommended as it would not provide sufficient data to be collected to make a meaningful contribution to the consumer trends report.

Yet another possibility could be to consider a hybrid of the two data sets mentioned already by agreeing a lesser set of reporting categories (as set out in the previous paragraph) for all and thereafter seeking to identify additional data categories where a significant number of NSAs can provide a set of common but also comparable data. In this way we could hope to expand the level of data available over an agreed timeframe while having a core set of reliable data to work with in the meantime. It would then be possible to draw some additional conclusions on consumer trends in these areas when further robust data becomes available. Nonetheless, this would still involve significant work to agree definitions, alter reporting into NSAs, etc. Again, the consumer trends sub-group would not have the resources to complete this work and additional resources would be required to achieve this goal.

Following the contributions from the September CCPFI, where there were differing views on the level of detail that should be sought, EIOPA is proposing to adopt an approach where specific high-level data is requested as the standard submission from NSAs with scope to provide additional data in specified categories where available. NSAs then would be encouraged to move towards providing the additional data as standard. Revised templates reflecting this approach have been developed for consideration. In addition, sub-group members proposed an alternative version of the complaints template, and this is submitted to the CCPFI for consideration.

Options for new data sources

The consumer trends sub-group considered whether other sources of data may be available. A suggestion was that EIOPA considers doing research where consumers themselves would be asked to provide information about their changing views, habits etc. Similarly, social media monitoring is a tool that some countries are beginning to use at least on a trial basis. EIOPA is currently considering this as a possible tool for early identification of consumer trends and retail risk identification. Initial assessment suggests that it could have interesting benefits as a way to track consumer trends and financial innovation particularly in the provision of timely information, albeit at high financial costs.

CCPFI members offered suggestions for a number of potential additional sources of information, as follows: Insurance Europe, Data Monitor, Mintel, and ECB. However these sources of information proved not to be reliable for the identification of consumer trends (see Annex 2 for further details).

EIOPA has also met with BEUC, who have indicated that they have information on different issues in the insurance sector, including complaints. They have also suggested a number of potential sources of information such as research findings and reports. EIOPA will explore these further as potential sources of additional complimentary information.

EIOPA will consider any additional potential sources that come to its attention to assess whether they can provide further insight into developing consumer trends.

How we addressed the 2012 Methodology Report's suggestions for consideration/next steps

The 2012 methodology report contained a suggestion to look at a number of aspects of the recommended methodology. The review of these areas is summarised below under the original headings used in the said 2012 report.

1. *Review or refine methodology including the templates;*
 - Reviewed as set out in 2-5 below

- Reviewed scope for methodology to be improved through additional/clearer definitions and proposal to converge data collection timelines
2. *Review timeline and actions for future reports;*
- Reviewed existing information about submission timelines to assess the latest workable cut-off date for submission
 - Requested informal input from CCPFI members on timelines that would suit their national data collection
3. *Review the variables used for comparisons, trends identification, and analysis of data on consumer trends;*
- Analysis of existing data submission experience completed suggesting a need to concentrate on high level variables
 - As only one year's data is currently available, review of how trends are to be identified can only be done in 2014 at the earliest, when data for 2012 and 2013 will have been collected
4. *Harmonise data - the previous sections suggest that the use of quantitative evidence can be further improved if Members States would agree on a certain level of harmonisation. Developing common categories for the quantitative templates would help to reduce any inconsistencies in the data, and may make it easier for Member States to put their own work into perspective;*
- Shortcomings in existing data submission have been identified and analysed
 - Scope to improve definitions/explanatory notes have been identified in some cases
 - Need identified for submissions to comply with existing/agreed definitions
 - Considered the need to revise submission timelines to get additional submissions
5. *Consider other sources of data*
- External sources considered and found to be deficient (see annex 2).
 - Social intelligence/social media monitoring being actively considered.

Recommendations

Based on experience with the data submissions made according to the revised methodology of 2012, analysis and compilation of the 2012 trends report and discussions in the sub-group, the following recommendations are proposed in line with the provisions in that report:

1. Consider and agree the revised templates, including the definitions and/or explanatory notes. Seek NSA commitment to converge the existing data provided by them once categorizations, definitions, and explanatory notes are agreed.
2. Seek NSA commitment to introduce new reporting over an agreed timeframe so that they can fill existing gaps in their submissions.
3. In view of the significant workload required to deliver a consistent validated harmonised data set on an ongoing basis the possibility of engaging internal resources at ESA level, dedicated to this task of data collection, validation and analysis should be considered. In assessing this, the possible need to evolve quantitative data should be considered. In addition, consideration needs to be given to agree a timeline to allow for harmonisation and rollout period (for Member States to implement). This approach should lead to a later data submission date in the future.
4. It is recommended that NSAs commit to agreeing to submit data on a reduced number of quantitative metrics for 2013 data (2014 submission date), and further commit to increasing the number of quantitative metrics for which they will submit harmonised data over an agreed period of time. It is further recommended that the mechanisms by which these submissions of harmonised data would be expanded will be agreed on a bilateral basis between EIOPA and NSAs.
5. Further explore potential of social media monitoring.

Annex 1: Assessment of potential enhancements to consumer trends quantitative reporting

| Description | Advantages | Disadvantages |
|--|---|---|
| Status Quo: continue with current reporting regime for all data categories. | No additional resourcing required; NSAs can add data as it becomes available. | Data is submitted on an inconsistent basis; data remains less comparable and less reliable; strong, clear conclusions cannot be derived; convergence is slow or non-existent. Limited number of Member States already submitting quantitative data. |
| Develop data reporting for all existing data categories through agreed definitions, standardised reporting at national level. | Consistent sequence of comparable data; robust & reliable; clear, consumer-focussed data; convergence is encouraged. | Difficult to agree new definitions; difficult to implement in national reporting systems; cost of adjusting reporting systems at national and undertaking levels; resource intensive; long lead time. |
| Develop data reporting for smaller subset of the existing data categories where data is already known to be available, through agreed definitions, standardised reporting at national level. | Consistent sequence of comparable data; robust & reliable; clear, consumer-focussed data; earlier implementation compared to option 1; less costly than option 1; more manageable than option 1. | Some difficulty to agree new definitions possible; somewhat difficult to implement in national reporting systems; some cost for adjusting reporting systems at national and undertaking levels; smaller data sets for reporting and decision-making; convergence is less encouraged |
| Develop smaller subset of existing data while working on convergence | Consistent sequence of comparable data; robust & reliable; | Difficult to agree new definitions; difficult to implement in |

| | | |
|--|--|---|
| <p>of a more substantial data set over time (hybrid of first two options above).</p> | <p>clear, consumer-focussed data; long implementation cycle but element of "quick win"; more manageable than option 1; convergence is encouraged.</p> | <p>national reporting systems; cost of adjusting reporting systems at national and undertaking levels; resource intensive; long overall lead time; smaller data sets initially for reporting and decision-making.</p> |
|--|--|---|

Annex 2: Assessment of external sources of data

Insurance Europe publishes data on their website. The published data, while interesting, suffers from some familiar limitations, as well as some new ones. Data is understandably market-focussed rather than consumer-focussed. 2011 data is the latest published, which is earlier than much of the data available to EIOPA from NSAs. Definitions are very general but it is clear for instance that reinsurance sales are included. Some non-EU countries are included and there is no consistency in the countries for which data is published from one table to the next. Clearly, significant effort would be required even to normalise the data for the latter issues. Furthermore, it is not clear to what extent validation has been carried out on the figures, so it is not clear if the figures are comparable or whether it is appropriate to aggregate them. This data is not considered as a reliable source for consumer trends reporting purposes.

Datamonitor offers a reporting service in respect of life and general insurance, and a knowledge centre for general insurance, with the focus on supplying UK data to firms for competitive applications. Reporting appears to be topic based and individual reports typically cost \$2,795 (€2,150 approx) for a single user licence. Knowledge centre costs are not stated on the company's website. Given the UK emphasis only this is not considered to be a suitable source of data for EIOPA purposes.

Mintel compile reports across various sectors including insurance. Reporting tends to be concentrated on North America and the UK and there is no indication that coverage is broad enough to satisfy the European perspective of EIOPA.

The European Central Bank collects some data on the insurance market. This was investigated previously by EIOPA staff and found to be inadequate for the purposes of the consumer trends reporting requirement.

BEUC and Eurostat have also been considered as potential sources of information; BEUC data still to be further considered.

Eurostat data is focussed on gross written premiums of the enterprises rather than having a consumer perspective. Data collected includes premium earnings from reinsurance business and pure business to business (e.g. shipping, aircraft) underwriting. The most recent year for which a substantial set of data is available is 2007. This data is not considered as a reliable source for consumer trends reporting purposes.

The OECD also publishes data on insurance total gross premiums. The latest publication was in November 2012 and covered up until 2009. Some EIOPA

Members and Observers are not represented in the data at all or are not included for the latest years.

Appendix 7

(Sheet 1 of 2)

Name of reporting country:

Does the National Supervisory Authority (NSA) have competence to collect this information?

If the answer to the previous question is 'NO', please indicate the name of the Competent Authority here:

Please forward this questionnaire to the relevant Competent Authority and indicate the date of forwarding here:

| |
|--|
| |
| |
| |

COMPLAINTS REPORTED about INSURANCE ENTITIES

| | |
|--|----------|
| Period of reporting: | Received |
| Total number of complaints in reporting period: | |

<- high level data

Please see definitions before filling out the templates!

Please provide a breakdown of complaints by complaint cause in reporting period if possible

| | |
|--|--|
| Number of complaints by complaint cause in reporting period | |
| Sales | |
| Claims | |
| Terms and conditions | |
| Commission and charges, premiums | |
| Administration | |
| Other 1 (please elaborate in Notes section below) | |
| Other 2 | |
| Other 3 | |
| Other 4 | |
| Other 5 | |
| Subtotal | |

<- high level data

If you do not report complaints by complaint causes under these exact headings, please try to fit them into the most relevant categories (e.g.misleading information into sales)

to be completed if available

Please provide a breakdown of complaints by insurance products in reporting period if possible

| | |
|---|----------|
| Number of complaints by insurance products in reporting period | Received |
| Life Insurance - total | |
| Life Insurance - with profit | |
| Life Insurance - unit-linked | |
| Other Life Insurance (please elaborate in Notes section below) | |
| Non life insurance - total | |
| Accident and Health insurance | |
| Motor Insurance | |
| Household Insurance | |
| Travel Insurance | |
| Other Non-life Insurance (please elaborate in Notes section below) | |

<- high level data

Where an insurance product type does not exist in your country or you do not have any data on the insurance product type to report, please input in "N/A" in the relevant row. Where you have data on the product type but the figure is "0", please input in the number "0" in the relevant row and do not leave blank. Please include the values for all insurance products that are not listed in the "other" section are in the "Comments/notes" section below.

<- high level data

to be completed if available

<- high level data

to be completed if available

Comments/notes: Include any other relevant information that helps explain the numbers.

Definition of complaint:
Please indicate the definition of complaint used in your jurisdiction:

Appendix 7

(Sheet 2 of 2)

VARIATIONS IN COMPLAINTS about INSURANCE ENTITIES

What are the **top three increasing causes of complaints**? These causes have shown the greatest percentage change as causes of complaints. Please provide information on how you came to this conclusion and if you have evidence to back it up, e.g. if you have quantitative information, please provide it.

| | | How did you come to this conclusion / evidence? | What do you think are the reasons behind the rise in complaints on this cause? |
|---------|--|---|--|
| Cause 1 | | | |
| Cause 2 | | | |
| Cause 3 | | | |

What are the **top three decreasing causes of complaints**? These causes have shown the greatest percentage change as causes of complaints. Please provide information on how you came to this conclusion and if you have evidence to back it up, e.g. if you have quantitative information, please provide it.

| | | How did you come to this conclusion / evidence? | What do you think are the reasons behind the decline in complaints on this cause? |
|---------|--|---|---|
| Cause 1 | | | |
| Cause 2 | | | |
| Cause 3 | | | |

What are the **top three Life Assurance products with the highest increase in complaints**? These causes have shown the greatest percentage change as causes of complaints. Please provide information on how you came to this conclusion and if you have evidence to back it up, e.g. if you have quantitative information, please provide it.

| | | How did you come to this conclusion / evidence? | What do you think are the reasons why complaints on this product are increasing? |
|-----------|--|---|--|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

What are the **top three Life Assurance products with the largest decrease in complaints**? These causes have shown the greatest percentage change as causes of complaints. Please provide information on how you came to this conclusion and if you have evidence to back it up, e.g. if you have quantitative information, please provide it.

| | | How did you come to this conclusion / evidence? | What do you think are the reasons behind this decline in complaints? |
|-----------|--|---|--|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

What are the **top three non-Life Assurance products with the highest increase in complaints**? These causes have shown the greatest percentage change as causes of complaints. Please provide information on how you came to this conclusion and if you have evidence to back it up, e.g. if you have quantitative information, please provide it.

| | | How did you come to this conclusion / evidence? | What do you think are the reasons why complaints on this product are increasing? |
|-----------|--|---|--|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

What are the **top three non-Life Assurance products with the largest decrease in complaints**? These causes have shown the greatest percentage change as causes of complaints. Please provide information on how you came to this conclusion and if you have evidence to back it up, e.g. if you have quantitative information, please provide it.

| | | How did you come to this conclusion / evidence? | What do you think are the reasons behind this decline in complaints? |
|-----------|--|---|--|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

Appendix 8
(Sheet 1 of 5)



EIOPA-CCPFI
25 October 2013

Product sales data reporting

| | |
|---|----------------------|
| Date of submission: | <input type="text"/> |
| Data reporting period: | <input type="text"/> |
| Name of reporting country: | <input type="text"/> |
| Name of reporting organisation: | <input type="text"/> |
| Name of primary contact person: | <input type="text"/> |
| Name of secondary contact person: | <input type="text"/> |
| Email address of primary contact person: | <input type="text"/> |
| Email address of secondary contact person: | <input type="text"/> |
| Phone number of the primary contact person: | <input type="text"/> |
| Phone number of secondary contact person: | <input type="text"/> |

Not all sections/rows of the data template need to be completed. Only sections/rows that are relevant to your own reporting standards need to be completed on a "best endeavours basis".

Where breakdown of aggregated data can be provided the sub-totals should sum up to the aggregated totals.

In cases where you hold no data, please input "N/A" in the relevant row. If you collect data on a particular data item but the actual total is "0" for a particular reporting period, please input in "0" in the relevant row.

Data on any product types that are not mentioned in the tables, should be included in the "other" box.

Please report all figures as actuals rounded to the nearest whole number.

Please refer to the definitions worksheet for a short description of the insurance product covered.

For further information or guidance on completing this data template please contact:

Appendix 8

(Sheet 2 of 5)

Definitions

| | |
|--------------------------------------|--|
| Insurance undertaking | A direct life or non-life insurance undertaking which has received authorisation in accordance with Article 13 & 14 of the Solvency II Directive. |
| Insurance intermediary | Any natural or legal person who, for remuneration, takes up or pursues insurance mediation according to 2002/92/EC on insurance mediation |
| Payment Protection Insurance | Payment Protection Insurance (PPI) is a product that covers the consumer of the financial burden in the event that he/she is unable to repay a loan due to reasons such as accident, sickness or unexpected unemployment. The loan which is covered by the PPI is generally be a consumer credit or a mortgage credit. |
| Life Insurance - with profit | A long-term insurance contract which provides benefits through, at least in part, eligibility to participate materially in periodic discretionary distributions based on profits arising from the firm's business or from a particular part. |
| Life Insurance - unit-linked | (in relation to a contract of insurance) a long-term insurance contract where the benefits are wholly or partly to be determined by reference to the value of, or the income from, property of any description (whether or not specified in the contract) or by reference to fluctuations in, or in an index of, the value of property of any description (whether or not so specified). |
| Accident and Health Insurance | Accident and Health insurance as per classes 1 and 2 of the Solvency II Directive |
| Motor Insurance | Including motor insurance, third party liability, third party liability fire and theft and fully comprehensive as per classes 3, 7, 10 of the Solvency II Directive |
| Household Insurance | Including details of all insurances providing cover for fire and other damage to property purchased by the consumer. Household insurance as per classes 8, 9 of the Solvency II Directive. |
| Travel Insurance | Including insurance policies which provide cover for loss or damage and other risks related to travel. |
| | |

1. Common questions on the NSA's competence regarding products sold

Does the National Supervisory Authority (NSA) have competence to collect this information:

If the answer to the previous question is 'NO', please indicate the name of the Competent Authority here:

Please forward this questionnaire to the relevant Competent Authority and indicate the date of forwarding here

2. Insurance product sales data

When providing figures, please provide actuals rounded to the nearest whole number (see Overview worksheet for more guidance).

Period of reporting:

Total insurance products sold

| | |
|--|----------------------|
| Total number of life insurance products sold | <input type="text"/> |
| Total number of non-life insurance products sold | <input type="text"/> |
| Subtotal | <input type="text"/> |

Please select the appropriate answer below (please tick box)

| The information available is: | YES | NO |
|--|--------------------------|--------------------------|
| Only on new policies | <input type="checkbox"/> | <input type="checkbox"/> |
| Both on new and renewed policies | <input type="checkbox"/> | <input type="checkbox"/> |
| Only on renewed policies | <input type="checkbox"/> | <input type="checkbox"/> |
| Only on retail contracts | <input type="checkbox"/> | <input type="checkbox"/> |
| Both on retail and wholesale contracts | <input type="checkbox"/> | <input type="checkbox"/> |
| Only from domestic insurance undertakings | <input type="checkbox"/> | <input type="checkbox"/> |
| Both from domestic undertakings and foreign branches | <input type="checkbox"/> | <input type="checkbox"/> |

Period for which the data in this template has been completed.

Parts 3 and 4 to be completed if the information is available

3. Further breakdown of number of life insurance products sold

| | | |
|---|------------------------------|-----------------------------|
| a. Do you have available further breakdown of the number of life insurance products sold? | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
| b. Comments on further breakdown (see also part 1): | | |
| | | |
| c. Life insurance contracts - further breakdown on number of products sold | Volume | |
| Life insurance - with profit | <input type="text"/> | |
| Life insurance - unit linked | <input type="text"/> | |
| Other life insurance - if possible, please elaborate in comments/notes section below | <input type="text"/> | |
| Subtotal | <input type="text"/> | |
| d. Please provide information on what is included in other life insurance. | | |
| | | |

If you do not have a further breakdown available please explain why in the comments below, i.e. do not collect this information, not within competence etc.

Where a product type does not exist in your country or you do not have any data on the product type, please input "N/A" in the relevant row. Where you have data on the product type but the figure is "0" for that reporting period, please input the number "0" in the relevant row and **do not** leave it blank.

Unknown should be included in this category. Please provide information below what is included in this category

3. Further breakdown of number of non-life insurance products sold

| | | |
|---|------------------------------|-----------------------------|
| a. Do you have available a further breakdown of number of non-life insurance products sold? | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
| b. Comments on further breakdown (see also part 1): | | |
| | | |
| c. Non-life insurance contracts - further breakdown on number of contracts sold | Volume | |
| Payment Protection Insurance | <input type="text"/> | |
| Accident and Health insurance | <input type="text"/> | |
| Motor insurance | <input type="text"/> | |
| Household insurance | <input type="text"/> | |
| Travel insurance | <input type="text"/> | |
| Other non life insurance - if possible, please elaborate in Comments/notes section below | <input type="text"/> | |
| Subtotal | <input type="text"/> | |
| d. Please provide information on what is included in other non-life insurance. | | |
| | | |

If you dont have a further breakdown available please explain why in the comments below, i.e. do not collect this information, not within competence etc.

Where a product type does not exist in your country or you do not have any data on the product type, please input "N/A" in the relevant row. Where you have data on the product type but the figure is "0" for that reporting period, please input the number "0" in the relevant row and **do not** leave a blank.

Where a product type does not exist in your country or you do not have any data on the product type, please input "N/A" in the relevant row. Where you have data on the product type but the figure is "0" for that reporting period, please input the number "0" in the relevant row and **do not** leave a blank.

Unknown should be included in this category.

1. Common questions on the NSA's competence regarding premiums

Does the National Supervisory Authority (NSA) have competence to collect this information?

If the answer to the previous question is 'NO', please indicate the name of the Competent Authority here:

Please forward this questionnaire to the relevant Competent Authority and indicate the date of forwarding here:

2. Insurance product premiums data

When providing figures, please provide actuals rounded to the nearest whole number (see Overview worksheet for more guidance).

Period of reporting:

Total insurance premiums

Total gross written premium in life insurance

Total gross written premium in non-life insurance

Subtotal

Please select the appropriate answer below (please tick box)

The information available is:

| | YES | NO |
|--|--------------------------|--------------------------|
| Only on new policies | <input type="checkbox"/> | <input type="checkbox"/> |
| Both on new and renewed policies | <input type="checkbox"/> | <input type="checkbox"/> |
| Only on renewed policies | <input type="checkbox"/> | <input type="checkbox"/> |
| Only on retail contracts | <input type="checkbox"/> | <input type="checkbox"/> |
| Both on retail and wholesale contracts | <input type="checkbox"/> | <input type="checkbox"/> |
| Only from domestic insurance undertakings | <input type="checkbox"/> | <input type="checkbox"/> |
| Both from domestic undertakings and foreign branches | <input type="checkbox"/> | <input type="checkbox"/> |

Period for which the data in this template has been completed for.

Parts 3 and 4 to be completed if the information is available

3. Further breakdown of life insurance gross written premium

| a. Do you have available a further breakdown of life insurance gross written premium? | YES | NO |
|---|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Comments on further breakdown: | | |
| <input type="text"/> | | |
| c. Life insurance contracts - further breakdown on gross written premium | | |
| | Premium | |
| Life insurance - with profit | <input type="text"/> | <input type="text"/> |
| Life insurance - unit linked | <input type="text"/> | <input type="text"/> |
| Other life insurance | <input type="text"/> | <input type="text"/> |
| Subtotal | <input type="text"/> | <input type="text"/> |

4. Further breakdown of non-life insurance gross written premium

| a. Do you have available a further breakdown of non-life gross written premium? | YES | NO |
|---|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Comments on further breakdown: | | |
| <input type="text"/> | | |
| c. Non-life insurance contracts - further breakdown on gross written premium | | |
| | Premium | |
| Payment Protection Insurance | <input type="text"/> | <input type="text"/> |
| Accident and Health insurance | <input type="text"/> | <input type="text"/> |
| Motor insurance | <input type="text"/> | <input type="text"/> |
| Household insurance | <input type="text"/> | <input type="text"/> |
| Travel insurance | <input type="text"/> | <input type="text"/> |
| Other non life insurance - please elaborate in Comments/notes section below | <input type="text"/> | <input type="text"/> |
| Subtotal | <input type="text"/> | <input type="text"/> |

If you do not have further breakdown available please explain why in the comments below, i.e. do not collect this information, not within competence etc.

Where a product type does not exist in your country or you do not have any data on the product type, please input "N/A" in the relevant row. Where you have data on the product type but the figure is "0" for that reporting period, please input the number "0" in the relevant row and do not leave blank.

Unknown should be included in this category.

If you dont have further breakdown available please explain why in the comments below, i.e. do not collect this information, not within competence etc.

Please provide details of gross written premium reported by insurers, where possible broken down by product. Where a product type does not exist in your country or you do not have any premium data on the product type, please input "N/A" in the relevant row. Where you have premium data on the product type but the figure is "0" for that reporting period, please input the number "0" in the relevant row and do not leave blank.

Unknown should be included in this category.

Appendix 8
(Sheet 5 of 5)

1. Products

a. What are the top three insurance products sold in your market. Please provide information on how you came to this conclusion and if you have evidence to back it up, e.g. if you have quantitative information, please provide it.

| | Life insurance | How did you come to this conclusion / evidence' | What do you think are the reasons why this is one of the most sold products' |
|-----------|----------------|---|--|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

| | Non-life insurance | How did you come to this conclusion / evidence' | What do you think are the reasons why this is one of the most sold products' |
|-----------|--------------------|---|--|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

b. What are the top three products gaining popularity (rising in percentage between years) on the insurance market. These products may not be the highest selling products but are products that are gaining popularity in your member state. Please provide information on how you came to this conclusion and if you have evidence to back it up, i.e.g. if you have quantitative information, please provide it.

| | Life insurance | How did you come to this conclusion / evidence' | What do you think are the reasons why this product is gaining popularity' |
|-----------|----------------|---|---|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

| | Non-life insurance | How did you come to this conclusion / evidence' | What do you think are the reasons why this product is gaining popularity' |
|-----------|--------------------|---|---|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

c. What are the top three declining products (declining in percentage between years) on the insurance market. These products may not be the least sold products but are products that are losing popularity in your member state. Please provide information on how you came to this conclusion and if you have evidence to back it up, e.g. if you have quantitative information, please provide it.

| | Life insurance | How did you come to this conclusion / evidence' | What do you think are the reasons why this product is declining in popularity' |
|-----------|----------------|---|--|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

| | Non-life insurance | How did you come to this conclusion / evidence' | What do you think are the reasons why this product is declining in popularity' |
|-----------|--------------------|---|--|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

2. Distribution

a. Have you identified any notable changes in the way in which insurance products are distributed within your market during the reporting period (either generally or in relation to particular product types). Please provide information on how you came to this conclusion and if you have evidence to back it up, e.g. if you have quantitative or qualitative information, please provide it.

| | Life insurance | How did you come to this conclusion / evidence' | Are there any observed patterns? |
|-----------|----------------|---|----------------------------------|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

| | Non-life insurance | How did you come to this conclusion / evidence' | Are there any observed patterns? |
|-----------|--------------------|---|----------------------------------|
| Product 1 | | | |
| Product 2 | | | |
| Product 3 | | | |

3. Market environment

a. Have you identified developments in the current market e.g. low premium or lowering of premium, that may be causing consumers to look at products not normally demanded? Please provide information on how you came to this conclusion and if you have evidence to back it up, e.g. if you have quantitative or qualitative information, please provide it.

| | Life insurance | How did you come to this conclusion / evidence' |
|-----------|----------------|---|
| Product 1 | | |
| Product 2 | | |
| Product 3 | | |

| | Non-life insurance | How did you come to this conclusion / evidence' |
|-----------|--------------------|---|
| Product 1 | | |
| Product 2 | | |
| Product 3 | | |

b. Are distributors offering products not previously offered? If applicable please provide information on the name and main characteristics of the product(s).

| | Life insurance | Main characteristics of the product' |
|-----------|----------------|--------------------------------------|
| Product 1 | | |
| Product 2 | | |
| Product 3 | | |

| | Non-life insurance | Main characteristics of the product' |
|-----------|--------------------|--------------------------------------|
| Product 1 | | |
| Product 2 | | |
| Product 3 | | |

c. Have there been any notable developments within your market that may have affected insurance behaviour? If applicable please provide information on what those developments are and how you came to this conclusion. If you have evidence to back it up, e.g. if you have quantitative or qualitative information, please provide it.

| Life insurance | What are the developments? | How did you notice/identify the developments/evidence |
|----------------|----------------------------|---|
| | | |

| Non-life insurance | What are the developments? | How did you notice/identify those developments/evidence' |
|--------------------|----------------------------|--|
| | | |

4. Other information

a. Are there any other developments or issues related to sales that are not covered above that you would like to report on?

| Life insurance | What are the developments/issues? | How did you notice/identify the developments/evidence |
|----------------|-----------------------------------|---|
| | | |

| Non-life insurance | What are the developments/issues? | How did you notice/identify the developments/evidence |
|--------------------|-----------------------------------|---|
| | | |

Appendix 9



EIOPA-CCPFI

25 October 2013

Thematic work reporting

Date of submission:

Data reporting period:

Name of reporting country:

Name of reporting organisation:

Name of primary contact person:

Name of secondary contact person:

Email address of primary contact person:

Email address of secondary contact person:

Phone number of the primary contact person:

Phone number of secondary contact person:

**In cases where you hold no data, please input "N/A" in the relevant row.
Please refer to the "Example Topics" worksheet for a short description of possible thematic work topics.**

PLEASE COMPLETE A SEPARATE TAB FOR EACH COMPLETED THEMATIC WORK ITEM

For further information or guidance to complete this data template please contact:

Appendix 9

Examples

Examples of work projects that could be considered as thematic work:

| |
|---|
| 1. Review of marketing documentation, or monitoring of advertising |
| 2. Desk based assessment of products and policies |
| 3. Requests for information on particular topics followed by subsequent analysis |
| 4. Complaints analysis |
| 5. Investigation of contracts |
| 6. Consumer research |
| 7. Mystery shopping exercise concerning a particular topic(s) |
| 8. Onsite inspections |
| 9. Discussions with firms |
| 10. Publications: publishing material to warn consumers |
| 11. Reports on annual basis where the content addresses particular consumer protection issues |
| 12. Initiatives on Financial Education or consumer information |

Note that the above list is not exhaustive and you can include data/information on other types of work in the Thematic Work tabs

Thematic Work

Please provide information about any thematic work you have finished in 2013 regarding consumer protection or financial innovation topics that provides insights into consumer trends.

Reporting of sensitive/confidential thematic work in this template is left to your discretion. If reporting such thematic work, please mention so explicitly in the answer to the first question.

Is the reported thematic work sensitive/confidential?:

Reason(s) for doing the thematic work:

Topic of thematic work:

Title of thematic work (if applicable):

Link to thematic work (if available):

Date thematic work was completed and/or published (please provide in the following format: Day/Month/Year):

Number and type of firms examined (if applicable):

Other sources of information/data used (e.g. files reviewed, etc.):

Method of review (e.g. desk-based, on-site, etc.):

Headline results/ key findings of the thematic work:

Next steps (if any):

Implications of the findings of the thematic work on:

- EU legislation (if any):

- National legislation (if any):

General comments:

Top three Consumer Protection Issues

Name of reporting country:

Does the National Supervisory Authority (NSA) have competence to collect this information?

If the answer to the previous question is 'NO', please indicate the name of the Competent Authority here:

Please forward this questionnaire to the relevant Competent Authority and indicate the date of forwarding here:

Issue 1

Please name your first consumer protection issue:

How did you decide about the importance of this issue?

Why do you think this issue has occurred?

Has the NSA taken any action or how does the NSA intend to take any action on this issue?

Issue 2

Please name your second consumer protection issue:

How did you decide about the importance of this issue?

Why do you think this issue has occurred?

Has the NSA taken any action or how does the NSA intend to take any action on this issue?

Issue 3

Please name your third consumer protection issue:

How did you decide about the importance of this issue?

Why do you think this issue has occurred?

Has the NSA taken any action or how does the NSA intend to take any action on this issue?

Note:

The wording 'first', 'second' and 'third' is not meant to rank the top three issues

Top three Financial Innovations

Name of reporting country:

Does the National Supervisory Authority (NSA) have competence to collect this information?

If the answer to the previous question is 'NO', please indicate the name of the Competent Authority here:

Please forward this questionnaire to the relevant Competent Authority and indicate the date of forwarding here:

Issue 1

Please name your first financial innovation:

How did you decide about the importance of this innovation?

Why do you think this innovation has developed?

Issue 2

Please name your second financial innovation:

How did you decide about the importance of this innovation?

Why do you think this innovation has developed?

Issue 3

Please name your third financial innovation:

How did you decide about the importance of this innovation?

Why do you think this innovation has developed?

Note:

The wording 'first', 'second' and 'third' is not meant to rank the top three issues