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Dostop do podatkov strank in prenosljivost podatkov v zavarovalniškem sektorju - 1. del: Semantični vmesnik in podatkovni model

Customer Data Access and Portability in the Insurance Sector - Part 1: Semantic interface and data model

Zugriff und Portabilität für Kundendaten in der Versicherungswirtschaft - Teil 1: Semantische Schnittstelle und Datenmodell

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Customer Data Access and Portability in the Insurance Sector - Part 1: Semantic interface and data model

Zugriff und Portabilität für Kundendaten in der Versicherungswirtschaft - Teil 1: Semantische Schnittstelle und Datenmodell

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COMITÉ EUROPÉEN DE NORMALISATION
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European foreword

This document (prEN 18356-1:2026) has been prepared by Work Group 1 “Digital Interchange” of Technical Committee CEN/TC 445 “Digital information interchange in the Insurance Industry”, the secretariat of which is held by DIN.

This document is currently submitted to the CEN Enquiry.

Introduction

The objective of this European Standard for customer data access and portability in the insurance sector is to support the implementation of the EU General Data Protection Regulation 2016/679 (GDPR) Article 20 and of the proposed EU Regulation on a Framework for Financial Data Access (FIDA) Articles 2(1), 4 and 5.

The EU Commission referenced this European standardisation priority as Action 12 in the 2024 Annual Union Work Programme for Standardisation, as well as in the Rolling Plan for ICT Standardisation 2024 as part of the requested actions for “Fintech and Regtech Standardisation” fostering innovation for the Digital Single market (Action 5).

This document contains the semantic specification of the interfaces for the required access to customer insurance data. In addition, CEN Technical Specifications describe the application programming interfaces (API) at the technical implementation level, such as FprCEN/TS 18356-2, in the Open API Technology.

The European standard for APIs and data formats is in demand in the insurance sector to support the right of the consumer for the data portability on the basis of GDPR Article 20 and the right of customers and data users for the customer data access to data holders on the basis of the proposed EU FIDA Regulation.

Consumers will benefit from

- more effective control over their personal data with the ability to control how their data is shared and used;
- standardised portability of their personal data from a data holder to a data user.

Insurance customers, consumers as well as companies, will benefit from

- standardised APIs which will result in a better flexibility to select the best products on the market;
- standardised data access supporting more choice and more individualised, data-driven products and services in the insurance sector;
- products that are better targeted to their demands and needs, including through more valuable advice;
- improved customer choice by enabling them to switch providers more easily;
- more optimal insurance coverage and increased financial inclusion of otherwise underserved customers;
- digital data entry at insurers and insurance intermediaries which will reduce their costs and will likely reduce the insurance premiums for the customers;
- better risk and claims management and analysis resulting in improved loss prevention.

The insurance industry, insurers and insurance intermediaries, will benefit from

- standardised APIs for data access and portability which will boost the digitalisation and will have significant efficiency gains in the data economy of the insurance sector;
- standardised customer data that will allow for the development of personalised tools for customers, such as insurance dashboards;
- digital data entry at insurers and insurance intermediaries which will reduce their costs;
- standardised customer data resulting in better advice to the customers;
- standardised customer data that will enable tailored offers for customer-specific and data-driven products, coverages, and services;
- increased cross-selling due to a better overview over the insurance status of the customers;
- better risk and claims management and analysis resulting in improved loss prevention for the customers.

Moreover, the European API standard is an important prerequisite for enabling efficient and cost-effective customer data access and portability ("plug-and-play communication"). Only a well-accepted open standard ensures a level playing field for all market participants, especially for SMEs, and protects consumers from lock-in effects.

Finally, the European API standard for customer data access and portability is an important step towards a European digital single market for the insurance sector, which is currently still focused on national markets. The standard will facilitate cross-border and cross-sector cooperation, supporting the development of market innovations and the platform economy.

1 Scope

This document specifies the customer (natural or legal person) data access and portability in the insurance sector based on the insurance-specific part of the proposed EU FIDA Regulation and therefore contains:

- Semantic specifications for the processes to support the data access and portability. These specifications define on the business level the functions and the behaviour for the following process interfaces:
  - Request of the customer to the data holder for an actual transfer of the customer data (FIDA Article 4).
  - Transfer of the requested customer data from the data holder to the requesting customer (FIDA Article 4).
  - Request of a data user to a data holder for an actual transfer of customer data under a permission of the customer (FIDA Article 5).
  - Transfer of the requested customer data from the data holder to the requesting data user (FIDA Article 5).
- Semantic specifications for the customer data to be transferred by the above processes. The scope of the customer data is limited to the insurance-specific part defined in the proposed FIDA Regulation Article 2 (1) and Article 3 (3). These specifications define on the business level each element of the customer data with unique name, precise definition, and value type (text, number, amount, quantity, percentage, date, etc.). The composition of these data elements forms a semantic data model for the insurance-specific customer data. The data model consists of the following parts:
  - General data of the insurance client (including personal details, address, contact information, payment means, etc.).
  - General data of the insurance policy (including policy number, insurance product and coverages, insured period, premium amounts, etc.).
  - Data specific to the insurance client's assets and risks, collected in an assessment for the purposes of a demands and needs test.
  - Data depending on line of business, such as
    - Motor insurance (details about vehicle, usage, drivers),
    - Property insurance (details about building, household, or other objects),
    - Liability insurance (details about insured parties and their activities),
    - Personal accident insurance (details about insured persons and their activities),
    - Legal expenses insurance (details about insured parties and objects),
    - Travel insurance (details about insured parties and objects),
    - Financial loss insurance (details about insured parties and risks),
    - Insurance-based investment products and private and occupational pension products (details about insured persons and the savings, investments, pension rights, etc.).

This document defines the semantic process specifications for the data access from a customer or a data user to the data holder for the customer, policy, and claims data. The processes for the identification, authentication, and authorisation of customers and data users and the processes for the handling of customer permissions are not in the scope of this standard.

This document specifies the processes and the data models on the semantic level in a syntax-neutral format, independent from its representation in a concrete implementation syntax. Separate CEN Technical Specifications describe the application programming interfaces (API) at the technical implementation level, such as FprCEN/TS 18356-2, in the Open API Technology.

The focus of this document is on the data elements usually required for the customer data access in European insurance markets. For a concrete implementation of the customer data access in a specific market, this standard could be extended by market-specific data elements. Many data elements in this standard utilize coded value lists, some of which are based on ISO or other internationally standardised code value lists, such as country or currency code values. Other code value lists are implemented on a market-specific basis, as the requirements for the value lists are very different due to diverse market conditions. This document makes no attempt to standardise these code value lists.

2 Normative references

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

ISO 639-3, *Codes for the representation of names of languages — Part 3: Alpha-3 code for comprehensive coverage of languages*

ISO 3166-1, *Codes for the representation of names of countries and their subdivisions — Part 1: Country codes*

ISO 4217, *Codes for the representation of currencies*

ISO 8601, *Date and time format*

3 Terms and definitions

For the purposes of this document, the following terms and definitions apply.

ISO and IEC maintain terminology databases for use in standardization at the following addresses:

— ISO Online browsing platform: available at https://www.iso.org/obp

— IEC Electropedia: available at https://www.electropedia.org/

3.1
customer
natural person or a legal person who is a micro, small or medium-sized enterprise, who makes use of financial products and services, and it means insurance clients or insured persons, excluding third-party beneficiaries

Note 1 to entry: Definition in accordance with proposed EU Regulation on a Framework for Financial Data Access (FIDA).

3.2
insurance client
customer that requests insurance coverage and pays the premium to an insurance company in exchange for the coverage provided by an insurance policy

Note 1 to entry: Insurance client is a synonym for the term “policyholder”.

3.3
insured person
party that is covered by an insurance policy

3.4
insurance intermediary
party that offers advice and arranges policies for clients

Note 1 to entry: Definition in accordance with IDD: Directive (EU) 2016/97 of the European Parliament and of the Council of 20 January 2016 on insurance distribution (recast) (OJ L 26, 2.2.2016).

3.5
insurance company
organization that covers an insurance client against a financial loss on receipt of a premium

Note 1 to entry: Definition in accordance with Solvency II: Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II) (recast) (OJ L 335, 17.12.2009).

3.6
customer data
personal and non-personal data that is collected, stored and otherwise processed by a financial institution as part of their normal course of business with customers which covers both data provided by a customer and data generated as a result of customer interaction with the financial institution

Note 1 to entry: Definition in accordance with proposed EU Regulation on a Framework for Financial Data Access (FIDA).

Note 2 to entry: Customer data includes data from the customer's insurance policies.

3.7
data holder
financial institution that collects, stores and otherwise processes the data listed in FIDA Article 2(1)

Note 1 to entry: Definition in accordance with proposed EU Regulation on a Framework for Financial Data Access (FIDA).

3.8
data user
entity listed in FIDA Article 2(2) who, following the permission of a customer, has lawful access to customer data listed in Article 2(1)

Note 1 to entry: Definition in accordance with proposed EU Regulation on a Framework for Financial Data Access (FIDA).

3.9
insurance policy
contract between an insurance client and one or more insurance companies to provide the insured person or persons with one or more insurance products

3.10
insurance product
contract between an insurance client and one or more insurance companies to provide the insured person or persons with coverage against certain specified risks in a specific insurance line of business

3.11
identifier
character string used to identify and distinguish uniquely one instance of an object in an identification scheme from all other objects within the same scheme

4 Symbols and abbreviations

UN/CEFACT - The United Nations Centre for Trade Facilitation and Electronic Business (UN/CEFACT) is a subsidiary of the United Nations Economic and Social Council and serves as intergovernmental body for trade facilitation recommendations and electronic business standards [unece.org/trade/uncefact].

UN/CCL - The data models specified in this standard are based on the UN/CEFACT Core Components Library (UN/CCL) containing syntax-neutral and technology-independent building blocks for data modelling [unece.org/trade/uncefact/unccl].

BPMN - BPMN stands for Business Process Model and Notation which is a standard to visualize business processes as a kind of flowchart. Within this standard BPMN in version 2.0 is used which itself is developed and maintained by the Object Management Group (OMG) [ISO/IEC 19510].

Figure 1 shows all BPMN-symbols used in the process BPMN-diagram of this document.

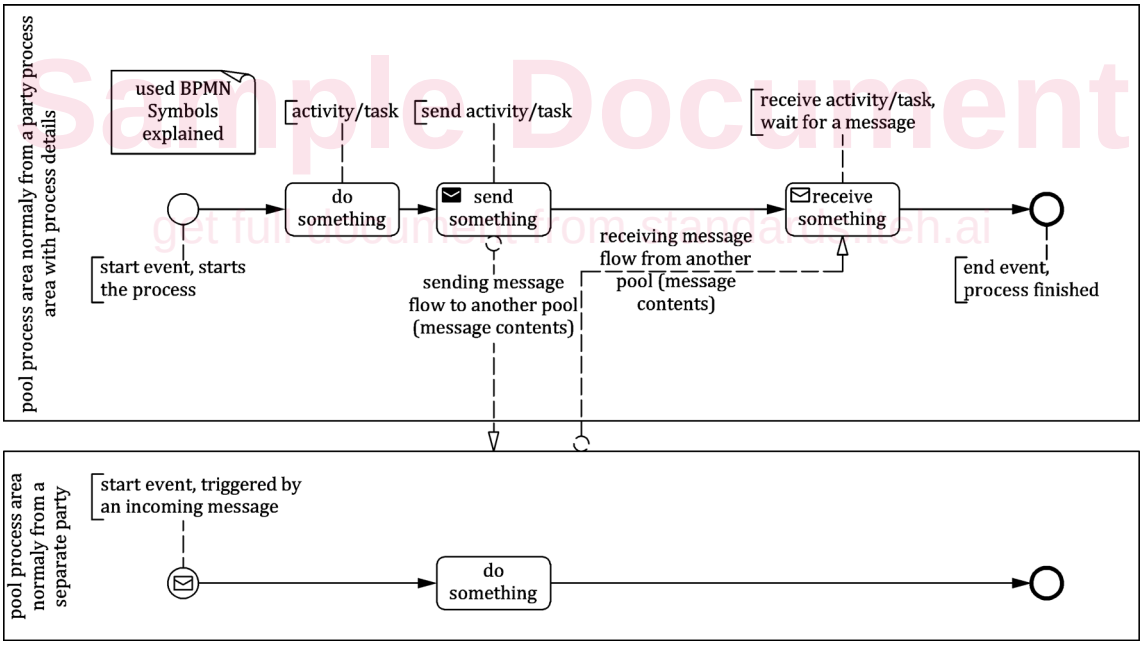

Figure 1 — BPMN-symbols used in the use case BPMN-diagrams

5 Business process and functionality for the customer data access and portability

5.1 The business process

The business process for the customer data access and portability is defined in the Articles 4 and 5 of the proposed EU FIDA Regulation on a Framework for Financial Data Access:

- Request of a customer to a data holder for an actual transfer of customer data (FIDA Article 4).
- Transfer of the requested customer data from the data holder to the requesting customer (FIDA Article 4).

- Request of a data user to a data holder for an actual transfer of customer data under a permission of the customer (FIDA Article 5).
- Transfer of the requested customer data from the data holder to the requesting data user (FIDA Article 5).

Due to the similar functionality required by FIDA Articles 4 and 5, the customer data access for the requesting party, a customer or a data user, is combined in this standard into one business process:

- Request of a customer or data user to a data holder for an actual transfer of customer data.
- Transfer of the requested customer data from the data holder to the requesting party, i.e. the customer or data user.

The business process in this standard is defined for a data access to a single insurance policy. If several policies are to be accessed, the process must be executed several times.

Based on the FIDA Regulation, the current status of the requested insurance policy shall be provided at the time of the data access.

It is assumed that in the case of coinsurance, only the lead insurer is relevant as data holder in accordance with the FIDA Regulation.

5.2 Preconditions of the business process for a customer data access

Before starting the process for the customer data access, some preconditions shall be fulfilled. The processes for fulfilling these preconditions are not in the scope of this document. The preconditions are:

- The data holder shall uniquely identify the customer whose data is being accessed.
- If the customer data is accessed by a data user, the data holder shall uniquely identify the data user.

- The data holder shall authenticate and authorise the party accessing the data, i.e. the customer or data user, to ensure data protection and security.
- If the customer data is accessed by a data user, the data user shall be in possession of the customer's permission for a purpose that covers the scope of the data. The permission shall have an identification identifier. And the data user shall have shared the customer's permission with the data holder.
- The party accessing the data shall know the unique identifier of the insurance policy, i.e. the policy number, whose data is to be accessed.

5.3 Customer data access request

The request to access customer data from a service provided by a data holder shall consist of the following data elements:

- An identification identifier, the policy number, shall be provided to identify the insurance policy.
- If the data access request is sent to a service that processes the requests for more than one data holder, an identification identifier shall be provided to identify the data holder from whom the data is requested, otherwise this data element is unnecessary.
- If the data access request is sent from a data user, the identification identifier of the customer permission for the data access shall be provided. If the data access request is sent from a customer, this data element is not relevant.
- If the data access request is sent from a data user, the purpose for the data access shall be provided. If the data access request is sent from a customer, this data element is not relevant.

5.4 Customer data access validation and data preparation

When a data holder receives a customer data access request, the data holder must perform the following validations:

- If the request contains an identification identifier of a data holder, the data holder shall validate the correctness of the identification.
- The policy number uniquely identifies an insurance policy in the portfolio of insurance policies of the data holder.
- If the request is sent from a customer, this customer is the insurance client or an insured person of the requested insurance policy.
- If the request is sent from a data user, the data holder shall validate the existence and validity of the identified permission given from the customer to this data user for the requested insurance policy and the data holder shall validate that the provided purpose for the data access is in the scope of this customer permission.
- The data holder shall comply with all legal requirements, in particular the GDPR and FIDA regulations, such as the FIDA requirement to only provide data from insurance policies that are in force.

If at least one of these validations fails, the data holder shall return an appropriate error message to the requestor.

If all validations are successful,

- the data holder shall select the customer data of the insurance policy which is in the scope of the requested purpose, and
- if the customer is not the insurance client, but an insured person, and the insurance policy covers more than one insured person, then the data holder shall select only the customer data with relevance to this insured person, and
- the data holder shall prepare the selected customer data of the insurance policy in the standard of this document.

5.5 Customer data access response

The response from a data holder to an access request for customer data shall include all data elements within the legal framework and within the scope of the requested purpose.

Clause 1 explains the different parts of the data model for customer data access. The general data on the insurance policy and the insurance client is largely independent of the insurance line. In contrast, there are different data requirements for the insurance products, coverages, and insured risks in each individual line of business.

Application programming interfaces (APIs) in current digital technologies should be as simple as possible. Simple means that the structure of the interface data model should be as simple as possible. Therefore, the response for the customer data access should not be implemented by only one interface with one large data model, but should consist of several interfaces with specific data models according the general data and according to each insurance line.

Specific interfaces for each insurance line are more concrete for the requirements of a specific line, which facilitates the implementation. And they are simpler for change management, as a necessary change in one line of business does not affect the interfaces for the other insurance lines.

5.6 The semantic process for the customer data access

Figure 2 illustrates the semantic process for the customer data access as a BPMN diagram. The diagram is based on the Business Process Model and Notation (BPMN 2.0) format. A short legend of the symbols used is given in Clause 4.

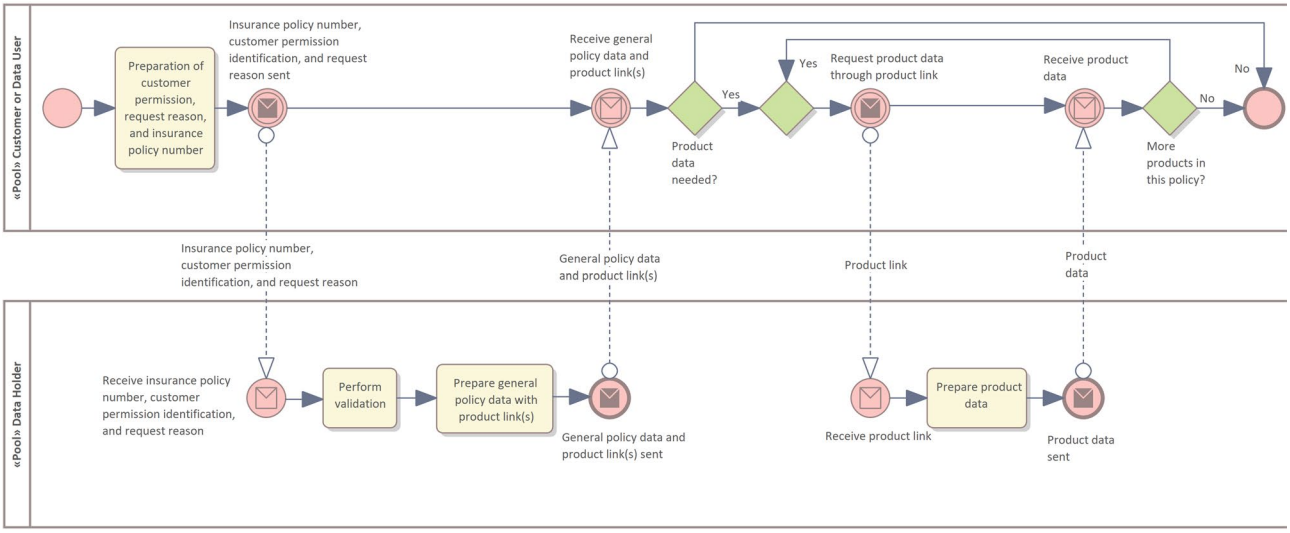

Figure 2 — BPMN-diagram of the customer data access process

The process for the customer data access shall be implemented in the sequence of the following process flow:

- The preconditions of the process specified in 5.2 shall be fulfilled.
- The request for the customer data access shall contain the data elements specified in 5.3.
- The data holder receives the request and shall perform the validation and preparation of the data of the insurance policy as specified in 5.4.
- The response to the request shall contain:
  - The general data for the insurance policy and the insurance client as specified in 6.3.
  - A list of the line-specific insurance products contained in the insurance policy, each with a link to the service where the corresponding product may be accessed. The details of this product list are specified in 6.3.
- When the requestor of the customer data receives the general policy data, the requestor may decide to access the product data or to waive access.
- If the requestor decides to access the product data, the requestor shall select one of the product links provided with the response of the general data.
- The requestor shall use this product link for the request to access the product data from the service of the data holder.
- The data holder receives the request and shall prepare the data of the requested insurance product.
- The data holder shall send the product data to the requestor in the specific data model of the insurance line of this product as specified in 6.4 to 6.12.
- When the requestor receives the product data and if not all products have been accessed yet, the requestor may decide to access the data of the next product.

6 Data models for the customer data access

6.1 General

The data models defined in Clause 6 for the customer data access are based on the Core Components of the UN/CEFACT Core Components Library (for reference see Clause 4).

A data model in the UN/CEFACT methodology consists of three different types of Core Components:

- **ACC**: Aggregate Core Component – a collection of related pieces of business information that together convey a distinct business meaning. An ACC is also referred to as a class or entity in other data modelling methodologies.
- **BCC**: Basic Core Component – a singular business characteristic of a specific Aggregate Core Component. A BCC is of a Data Type defined in 6.2, which defines its set of values.
- **ASCC**: Association Core Component – a complex business characteristic of a specific Aggregate Core Component that is associated to another Aggregate Core Component, which describes its structure.

IMPORTANT:
The terms of the Core Components are decisive for this standard. They are essential for the interoperability of implementations of this standard. In particular, these terms are used with exactly the same naming in FprCEN/TS 18356-2, to implement this standard in Open API technology. Therefore, the terms of the Core Components in the diagrams and the names of the business terms and data types in the tables must not be changed or translated into other languages.

The structure of the data models for the customer data access in this standard assumes that insurance policies consist of one or more insurance products that may contain several coverages (see Figure 3). The level of the insurance policy is independent of a specific insurance line. The insurance lines are introduced on the product level, such as motor insurance or private property insurance.

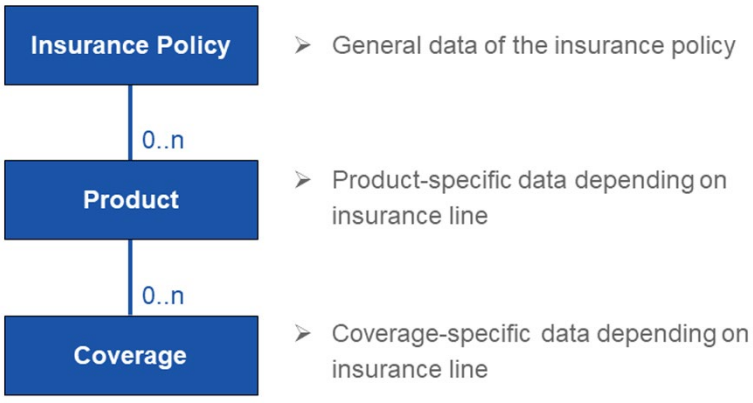

Figure 3 — Structure of the insurance data model

Examples for the insurance data model:

- A home owner policy may consist of a building insurance, a household content insurance, a personal liability insurance, and a bicycle insurance.
- A building insurance product may consist of coverages for fire, storm, flood, and vandalism damages.
- A commercial policy may include a property insurance, a business interruption insurance, a commercial liability insurance, a product liability insurance, and a machinery insurance.