

# Country-by-country analysis - Slovenia

Annex IX to the Report on the application of the  
Insurance Distribution Directive (IDD)

Consumer Protection Department  
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EIOPA-BoS-21/584  
06 January 2022

**Note:**

**Powers of national competent authorities (NCAs):**

In January 2021, EIOPA launched an online survey addressed to NCAs to gather input as to whether they are sufficiently empowered to carry out their tasks. The following information is based on the response from the Insurance Supervision Agency to this survey.

The figures should be interpreted with some caution as insurance markets – including the number and type of insurance intermediaries operating therein – vary significantly across Members States, as well as the supervisory structure and framework. **There are, therefore, limits to the level of comparability of data.**

**Changes in the EU insurance distribution market:**

In February 2021, EIOPA launched a survey addressed to NCAs to gather information on the insurance intermediaries' market structure and patterns of cross-border activities. The following information is based on the response from the Insurance Supervision Agency to this survey.

The figures should be interpreted with some caution as there are differences as to how intermediaries are registered in their home Member State, in the national categories of insurance intermediaries and in the approaches by NCAs to collect data.

## SLOVENIA

### Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2020):

	Amounts	Share total EEA
Population (in 1000) <sup>1</sup>	2,095	0.5%
(Re)insurance GWP (in million) <sup>2</sup>	2,815.33	0.2%
Number of (re)insurance undertakings <sup>3</sup>	15	0.6%
Number of registered insurance intermediaries	15,475	1.7%

National competent authority:

Insurance Supervision Agency

Registered insurance intermediaries split by natural and legal persons:

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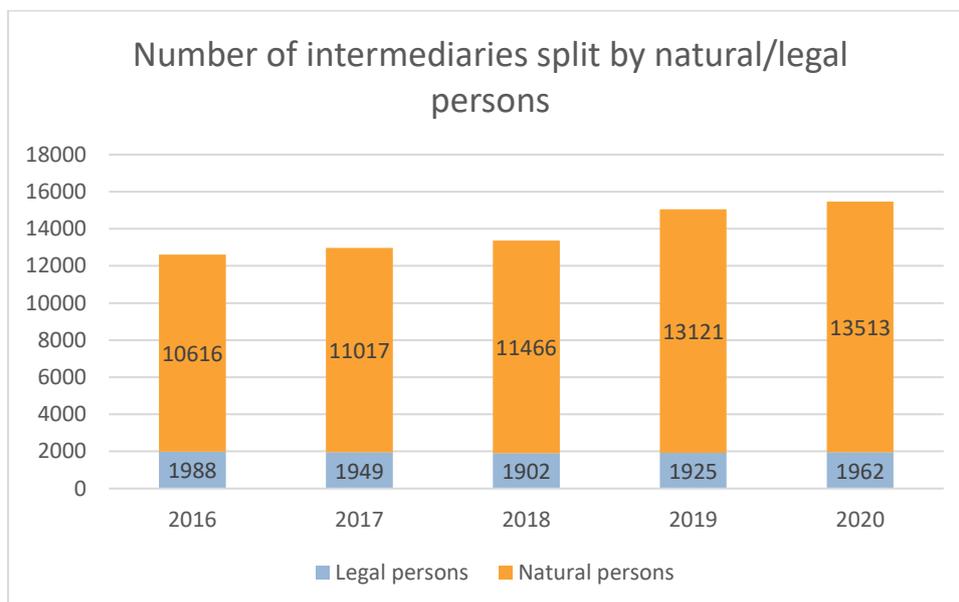
<sup>1</sup> Based on eurostat data:

<https://ec.europa.eu/eurostat/documents/2995521/11081093/3-10072020-AP-EN.pdf/d2f799bf-4412-05cc-a357-7b49b93615f1>

<sup>2</sup> (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2020 based on annually reported SII information:

[https://www.eiopa.europa.eu/tools-and-data/insurance-statistics\\_en#Premiums,claimsandexpenses](https://www.eiopa.europa.eu/tools-and-data/insurance-statistics_en#Premiums,claimsandexpenses)

<sup>3</sup> Number of (re)insurance undertakings includes the domestically registered undertakings. Based on SII information (see link above)

Online registration system:

The Slovenian Insurance Supervision Agency provides online registration (<https://azn.e-obcina.si/objave/364>). On yearly basis the Agency receives only 10 applications over online registration tool.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:

We do not have the requested data available. We can not match the data from our register to the requested categories.

In Slovenia the agents and brokers are not paid by the customers. Brokerage companies act on behalf of the customer, but are paid by the insurance undertakings.

As a rule, the insurance intermediaries act on behalf of one insurance intermediary and not more.

We do not have the data on how many of the registered natural persons are employed by the insurance intermediaries, and how many of the registered legal persons are working on behalf of a single insurance intermediary.

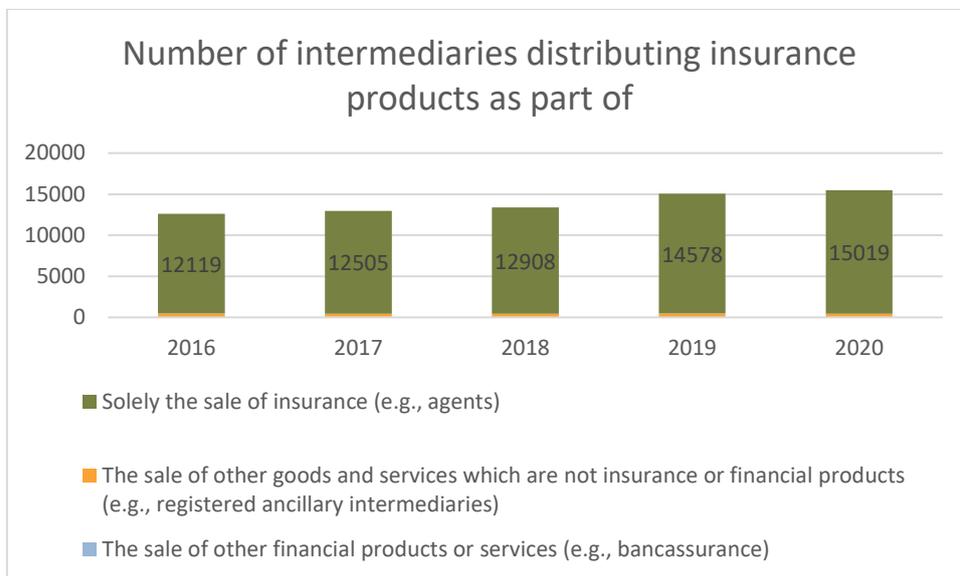
We do not have the data on how many of the agents and agencies are tight agents or exclusive agencies, therefore we can not provide this data. Brokers as a rule cooperate for more than one insurance undertakings.

Registered insurance intermediaries split by categories based on the way in which they are paid:

Percentage of intermediaries paid in relation to the insurance contract	No intermediary is remunerated this way	Up to 25% of the intermediaries in the market are remunerated this way	25%-50% of the intermediaries in the market are remunerated this way	50%-75% of the intermediaries in the market are remunerated this way	More than 75% of the intermediaries in the market are remunerated this way
<b>1. on the basis of a fee</b>					
<b>2. on the basis of a commission</b>					100%
<b>3. on the basis of any other type of remuneration</b>					
<b>4. on the basis of a combination of any type of remuneration set out at points 1, 2 and 3</b>					
<b>5.Total percentage of registered intermediaries (5=1+2+3+4)</b>	0%	0%	0%	0%	100%

The remuneration has been always included in the insurance premium in the Republic of Slovenia. We haven't noticed any other way of remuneration in our supervisory activities. All (100%) of the insurance intermediaries (agents, brokers, tight agents, etc.) fall under point 2 for every year.

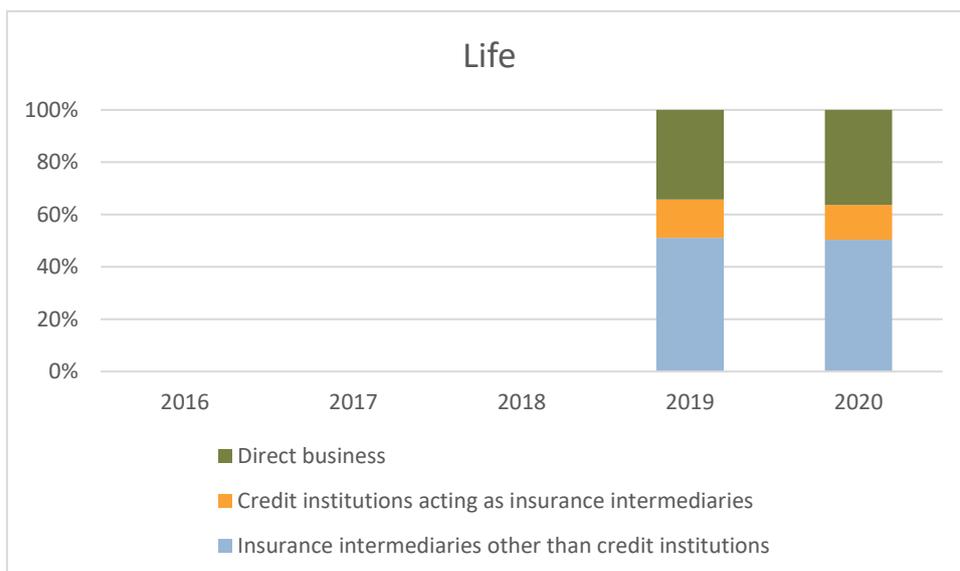
**Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:**

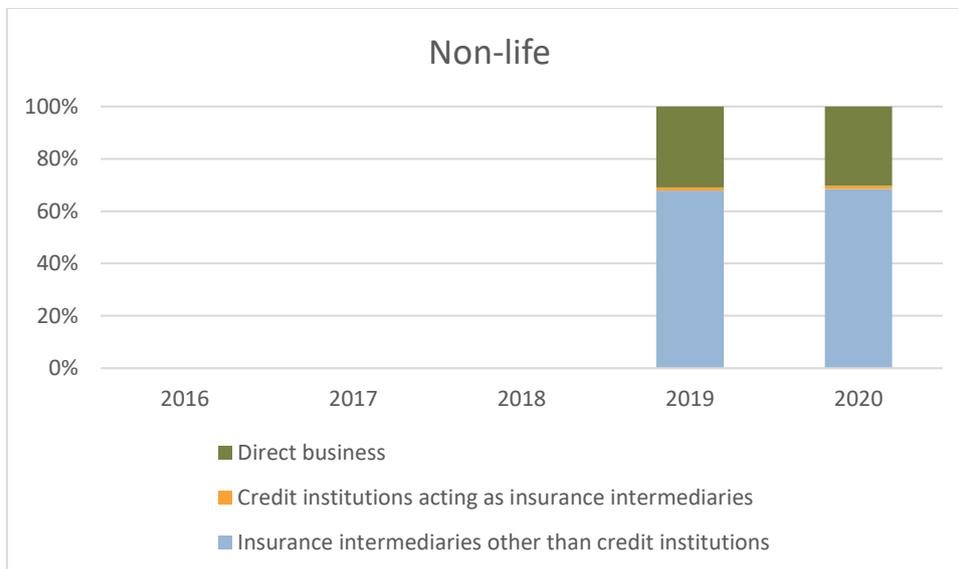


**Comments provided by the NCA on the figures included in the chart above:**

The Agency has special register and licence only for the ancillary intermediaries. Others can distribute all insurance products.

**GWP split by distribution channels:**





Comments provided by the NCA on the figures included in the chart above:

The source of given statistical data is Slovenian insurance association, available only for the years 2019 and 2020. Statistical data include GWP in Slovenia by insurance companies with head office in Slovenia as well as by branches of insurance companies with head offices in EEA countries, operating in Slovenia on the basis of "freedom of establishment" clause.

In previous questionnaires we gave the data from different source for the years since 2016 on, but that source does have more limitations and is not comparable with our new source of data. Therefore we have not given the data for the years 2016-2018.

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

YES

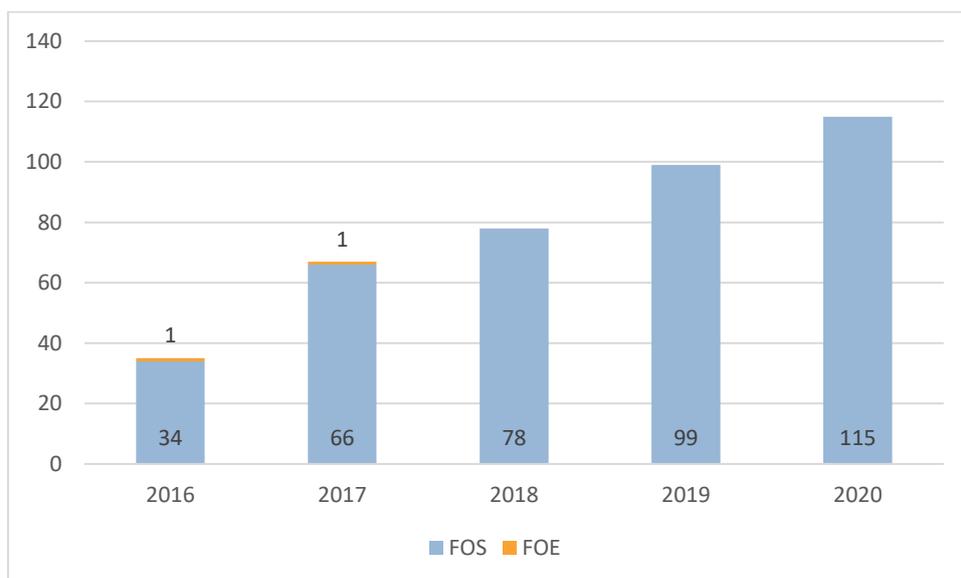
In 2019 1,5% (non life 2%, life 0,2%)

In 2020 1,4% (non life 1,9%, life 0,2%)

Comments provided by the NCA on the data above:

Data is obtained from the Slovenian Insurance association, where the majority of the insurance undertakings (including branches) are members. Therefore the data represent the whole market picture.

**Number of domestic insurance intermediaries with a passport to carry out insurance mediation activities under freedom to provide services (FOS) or under freedom of establishment (FOE)**



**Number of insurance intermediaries with a passport to carry out insurance mediation activities under FOS or under FOE at the reference date 31.12.2020 split by host Member State:**

<i>Host Member State</i>	<i>1. FOS</i>	<i>2. FOE</i>	<i>3. TOTAL</i>
<i>Austria</i>	22	0	22
<i>Belgium</i>	1	0	1
<i>Bulgaria</i>	0	0	0
<i>Cyprus</i>	0	0	0
<i>Croatia</i>	98	0	98
<i>Czech Republic</i>	2	0	2

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<i>Denmark</i>	0	0	0
<i>Estonia</i>	0	0	0
<i>Finland</i>	0	0	0
<i>France</i>	2	0	2
<i>Germany</i>	7	0	7
<i>Greece</i>	0	0	0
<i>Hungary</i>	3	0	3
<i>Iceland</i>	1	0	1
<i>Ireland</i>	0	0	0
<i>Italy</i>	9	0	9
<i>Latvia</i>	0	0	0
<i>Liechtenstein</i>	3	0	3
<i>Lithuania</i>	0	0	0
<i>Luxembourg</i>	0	0	0
<i>Malta</i>	0	0	0
<i>Netherlands</i>	0	0	0
<i>Norway</i>	1	0	1
<i>Poland</i>	1	0	1
<i>Portugal</i>	0	0	0
<i>Romania</i>	0	0	0
<i>Slovakia</i>	2	0	2
<i>Slovenia</i>	0	0	0
<i>Spain</i>	0	0	0
<i>Sweden</i>	0	0	0
<i>Total EEA</i>	152	0	152

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Comments provided by the NCA on the figures included in the table above:

13 intermediaries have passport for the whole EU and they are not included in a spreadsheet above.

## Information on the powers of the NCA

### Statutory powers to implement the IDD:

- Registration of (re)insurance intermediaries and ancillary insurance intermediaries (Article 3);
- Notification procedure (Articles 4 and 6);
- Breach of obligations when exercising the freedom to provide services and the freedom of establishment (Articles 5 and 8);
- Publication of general good rules (Articles 11);
- Breaches, (administrative) sanctions and other measures, including their publication and reporting (Articles 31, 32, 33, 35 and 36)

### Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD

With the existing human resources we are continuing to continuously increase the activities connected with the implementation of the IDD to ensure that they are in line also with the EIOPA guidelines.

### Most common supervisory tools to monitor the IDD implementation (1=least common; 5=most common)

Tools	Insurance undertakings	Insurance intermediaries
Market monitoring	2	1
Data-driven market monitoring, beyond complaints data analysis	5	1
Thematic reviews	4	1
Mystery shopping	n/a	n/a
On-site inspections	5	5

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Off-site monitoring	5	1
Consumer focus groups	2	1
Product oversight activities	2	1
Consumer research	1	1
Investigations stemming out of complaints	5	5
Other <i>a priori</i> supervisory activities (e.g., fit&proper assessments)	5	5

Supervisory tools adopted before and following IDD implementation:

Cells marked in **blue** means "yes" and cells marked in **grey** means "no".

Tools adopted	Adopted before IDD implementation	Adopted following IDD implementation	Is planning to adopt this or next year	Would like to adopt but is not empowered to adopt
Market monitoring				
Data-driven market monitoring, beyond complaints data analysis				
Thematic reviews				
Mystery shopping				
On-site inspections				

Off-site monitoring				
Product oversight activities				
Consumer focus groups				
Consumer research				
Investigations stemming out of complaints				
Other <i>a priori</i> supervisory activities (e.g., fit & proper assessments) – indicate below				

Comment by NCA on supervisory tools referred to in the table above:

AZN has been since the implementation of the IDD working on widening the supervisory scope on existing supervisory activities.

All supervisory tools were implemented before the IDD; but with the implementation of the IDD directive, their scope was broadened and adjusted to IDD requirements.

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