

Country-by-country analysis

DENMARK

Annex VII to the 2nd Report on the application
of the Insurance Distribution Directive (IDD)

Consumer Protection Department
EIOPA REGULAR USE
EIOPA-BoS-23-480
29 November 2023



eioipa

European Insurance and
Occupational Pensions Authority

Note:

Powers of national competent authorities (NCAs):

In February 2023, 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 responses from 30 NCAs¹ to this survey.

Changes in the EU insurance distribution market:

In February 2023, 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 responses from 30 NCAs² 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.

¹ AT (BMAW and FMA), BE, BG, CY, CZ, DK, EE, ES, FI, FR, GR (UHC and BOG), HR, HU, IE, IT, LI, LT, LU, LV, MT, NL, NO, PL, PT, RO, SE, SI, SK

² AT (BMAW and FMA), BE, BG, CY, CZ, DK, EE, ES, FI, FR, GR (UHC and BOG), HR, HU, IE, IT, LI, LT, LU, LV, MT, NL, NO, PL, PT, RO, SE, SI, SK

DENMARK

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

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ³	5,873	1,3%
(Re)insurance GWP (in million) ⁴	40,744.612	3.0%
Number of (re)insurance undertakings ⁵	72	4.2%
Number of registered insurance intermediaries	2571	0.3%

National competent authority:

Danish Financial Supervisory Authority

³ Based on eurostat data for 1 January 2022:

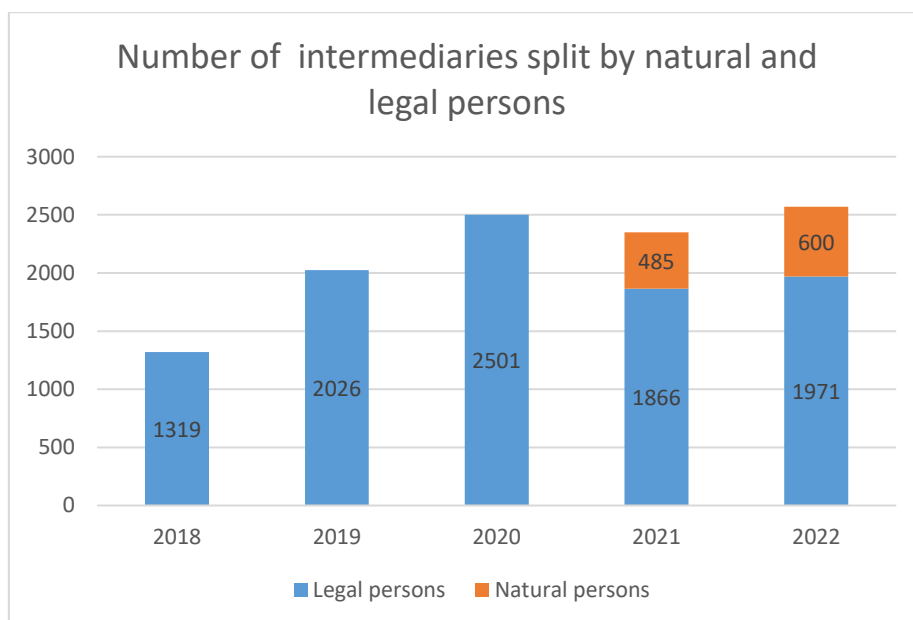
<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

⁴ "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁵ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:**Comments provided by the NCA on the figures included in the chart above:**

With the implementation of the IDD in October 2018, it was no longer possible to be registered as a natural person in Denmark. In Denmark we have previously submitted numbers for natural persons, understanding a natural person, as a person with personal license to perform insurance distribution in a legal person with the required permit. After October 2018 we only approve the entities (companies) in which the natural persons perform insurance distribution.

The data includes both regular intermediaries and ancillary intermediaries.

Natural persons 2021: The split between intermediaries and ancillary intermediaries is 183 / 302

Legal persons 2021 : The split between intermediaries and ancillary intermediaries is 405 / 1461

Natural persons 2022: The split between intermediaries and ancillary intermediaries is 283 / 317

Legal persons 2022: The split between intermediaries and ancillary intermediaries is 427 / 1544

Online registration system:

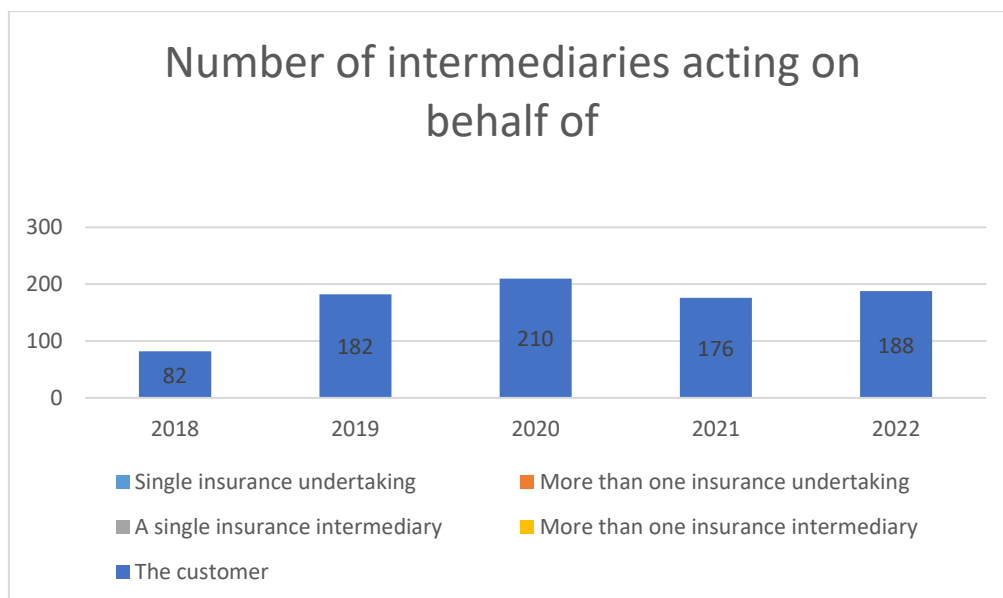
In Denmark all applicants must apply through www.virk.dk - either as an intermediary or ancillary intermediary.

https://virk.dk/myndigheder/stat/FT/selvbetjening/Ansoegningsskema_for_registrering_som_forsikringsformidler_eller_genforsikringsformidler/

https://virk.dk/myndigheder/stat/FT/selvbetjening/Ansoegningsskema_for_registrering_som_accessorisk_forsikringsformidler/

As soon as the application has been processed and the intermediary has been registered, the official register on DFSA's website is updated.

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



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

In Denmark we do not register the number or the name(s) of the insurance companies, for whom an intermediary distributes insurances. Once the registration is completed the insurance intermediary may choose how many insurance companies it wishes to cooperate with and it may change from one insurance company to another without informing the DFSA.

The intermediary may also act independently of the insurance companies, acting solely on behalf of the customer, in which case Denmark has introduced additional requirements to protect the customer.

Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:

7% of the insurance intermediaries are paid in relation to the insurance contract on the basis of a fee.

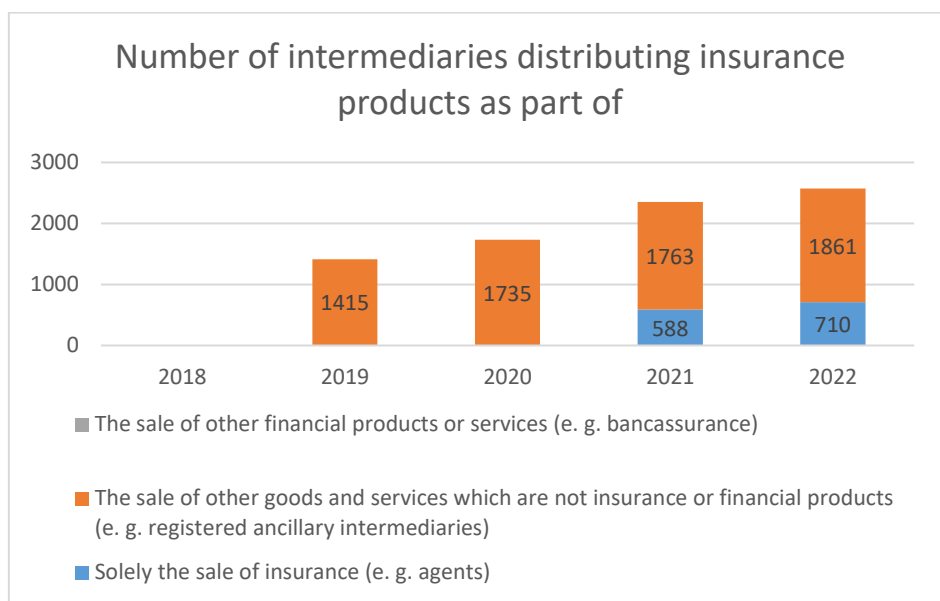
Comments provided by the NCA on the figures above :

In Denmark it is possible to register as an "independent intermediary". These independent intermediaries may only receive fees directly from the customer (as they may only represent the customer). Denmark has registered 188 of these independent intermediaries which comes to 7% of the total amount of intermediaries.

Upon implementation of the Directive, Denmark made the conscious choice not to over-implement. Consequently, the intermediaries are not obliged to report this kind of information to the DFSA.

The DFSA has identified the largest insurers representing at least 60% of the national market and intends to ask the insurers to provide the data in question. However, please note that these insurers are not legally obligated to answer

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:

In Denmark, we do not register information regarding the sale of other financial products or services (e.g : bancassurance).

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

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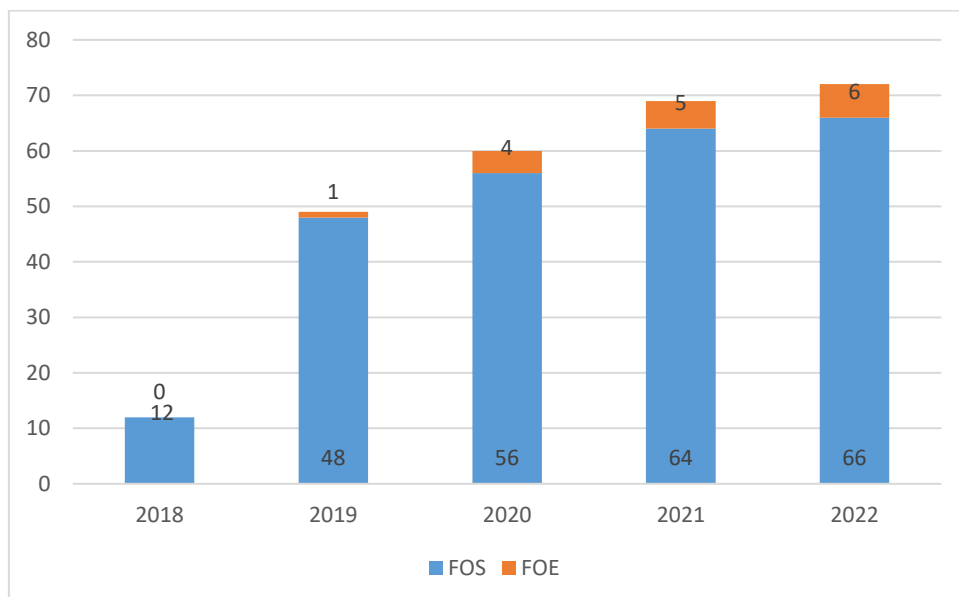
The DFSA has identified the largest insurers representing at least 60% of the national market and intends to ask the insurers to provide the data in question. However, please note that these insurers are not legally obligated to answer.

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

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The DFSA has identified the largest insurers representing at least 60% of the national market and intends to ask the insurers to provide the data in question. However, please note that these insurers are not legally obligated to answer.

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



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁶

Host Member State	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	14	0	14
<i>Belgium</i>	17	0	17
<i>Bulgaria</i>	13	0	13
<i>Cyprus</i>	13	0	13
<i>Croatia</i>	9	0	9
<i>Czech Republic</i>	11	0	11

⁶ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Denmark</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Estonia</i>	<i>16</i>	<i>0</i>	<i>16</i>
<i>Finland</i>	<i>24</i>	<i>1</i>	<i>24</i>
<i>France</i>	<i>21</i>	<i>0</i>	<i>21</i>
<i>Germany</i>	<i>27</i>	<i>1</i>	<i>27</i>
<i>Greece</i>	<i>15</i>	<i>0</i>	<i>15</i>
<i>Hungary</i>	<i>12</i>	<i>0</i>	<i>12</i>
<i>Iceland</i>	<i>13</i>	<i>0</i>	<i>13</i>
<i>Ireland</i>	<i>15</i>	<i>0</i>	<i>15</i>
<i>Italy</i>	<i>19</i>	<i>0</i>	<i>19</i>
<i>Latvia</i>	<i>14</i>	<i>0</i>	<i>14</i>
<i>Liechtenstein</i>	<i>6</i>	<i>0</i>	<i>6</i>
<i>Lithuania</i>	<i>14</i>	<i>0</i>	<i>14</i>
<i>Luxembourg</i>	<i>15</i>	<i>0</i>	<i>15</i>
<i>Malta</i>	<i>10</i>	<i>0</i>	<i>10</i>
<i>Netherlands</i>	<i>20</i>	<i>3</i>	<i>20</i>
<i>Norway</i>	<i>31</i>	<i>2</i>	<i>33</i>
<i>Poland</i>	<i>19</i>	<i>0</i>	<i>19</i>
<i>Portugal</i>	<i>12</i>	<i>0</i>	<i>12</i>
<i>Romania</i>	<i>13</i>	<i>0</i>	<i>13</i>
<i>Slovakia</i>	<i>13</i>	<i>0</i>	<i>13</i>
<i>Slovenia</i>	<i>11</i>	<i>0</i>	<i>11</i>
<i>Spain</i>	<i>18</i>	<i>2</i>	<i>18</i>
<i>Sweden</i>	<i>33</i>	<i>2</i>	<i>34</i>
<i>Total EEA</i>	<i>468</i>	<i>11</i>	<i>471</i>

General qualitative description of the “patterns of cross-border activity”:

Relatively limited interest in cross-border activities compared to the total number of registered intermediaries.