



Privacy Notice

Howden Specialty & Reinsurance Asia Pacific

HOWDEN

1. Introduction

Howden Specialty & Reinsurance Asia Pacific ("Howden Specialty", "we", "us", "our") refers to a group of (re)insurance intermediary entities that operate in different locations throughout the Asia Pacific region. We are part of Howden, an international insurance group that supports clients while using insurance as a tool to increase resilience for individuals, businesses, and communities.

In order to provide our services we need to collect, process and share information, including information which may identify individuals ('personal data'). This Privacy Notice applies to you in the event that we have collected personal data from or about you. It explains when, why and how we collect and process your personal data, the third parties with which we may share your personal data, what your rights are in the event we hold your personal data, and how you can enforce these rights.

We may amend this Privacy Notice from time to time in order to reflect any changes in how we process personal data, or to satisfy any new requirements under applicable data protection laws. If we make any significant changes, we will let you know directly.

This version of the Privacy Notice was published in October 2023.

2. Definitions

To be clear on what we mean in this Privacy Notice:

- "personal data" means any information that can be used to identify a living individual;
- "sensitive personal data" means personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, health data, sex life or sexual orientation;
- "controller" means an organisation that decides why and how to collect personal data from or about an individual;
- "processor" means an organisation that is engaged by a controller to process personal data on its behalf;
- "the Howden Group" means Howden Group Holdings Limited and any company or organisation in which Howden Group Holdings Limited holds significant share capital. Howden Specialty are part of the Howden Group. You can find out more information about the other companies in the Howden Group by visiting www.howdengroupholdings.com;
- "third-party" means someone who isn't you, us, or a company in the Howden Group.

3. Who does this notice relate to

This Privacy Notice relates to the following types of Relevant Individuals (“you”, “your”, “data subjects”) where we hold your personal data:

- Directors, authorized personnel, beneficial owners, other associates of, or persons exercising control over the corporate clients and intermediaries that we do business with;
- Clients, policyholders, employees of our clients, and any other third party individuals whose personal data we are provided with by our clients and intermediaries;
- Prospective clients who have received a (re)insurance quotation, former clients who have previously held an(re)insurance policy arranged or administered by us, and client representatives, for example those with power of attorney;
- Individuals who contact us with a query, concern or complaint;
- Other individuals named on (re)insurance policies, such as joint policy holders, or beneficiaries;
- Individuals who request information from us or permit us to contact them for marketing purposes.

4. Our details

The registration and authorisation details for each of our companies can be found within the Appendix. Our services consist primarily of (re)insurance intermediation, which facilitates the consideration of, access to, administration of, and making of claims in respect of, (re)insurance services.

Our wholesale teams include International Property, Natural Resources, Logistics, Construction, Financial Lines, Reinsurance and other specialty products. We serve mostly corporate clients or intermediaries, though you may be a consumer client that provides us with personal data. Our wholesale teams provide (re)insurance placements and claims settlement services to (re)insurers, brokers and (re)insurance intermediaries.

Should you have a data protection query, wish to enforce one of your rights or wish to make a data protection complaint, then please send an email to our Data Protection Officer who can be contacted at dpo.hsapac@howdengroup.com

5. What personal data do we collect

Depending on your relationship with us, we may collect the following types of personal data from or about you in either electronic or physical formats:

- **Identity and contact data:** for example, your name, gender, date of birth, postal address, job title, telephone number and e-mail address. We may also collect identification details and documents to verify your identity as an individual policyholder or as a director of a business;
- **Policy and claims information:** for example, your policy number, insured amounts, premiums due, relationship to the policyholder, claims made via us or your previous claims history;
- **Payment and account data:** for example, your bank account details, credit/debit card details where you are the payer of a premium;
- **Location data:** for example, your residential or IP address, the location of any insured property, and in the event of a claim, where the incident occurred;
- **Correspondence data:** for example, copies of letters and e-mails we send you or you send to us, and notes or call recordings of any telephone conversations.
- **Information we obtain from other sources:** for example information we obtain from credit agencies, anti-fraud and other financial crime prevention agencies;
- **Complaint data:** for example, what the complaint was, how we investigated it and how we resolved it, including any contact with third-party adjudicator services;
- **Sensitive personal data:** in some cases it may be necessary for us to collect more sensitive types of information, for example health-related data, as part of responding to a claim, or it may be necessary for us to collect data relating to criminal convictions or offences as part of undertaking 'know your customer' checks which are required by our regulators.

6. How do we collect personal data

We may collect personal data from, or about, you at different times and through different channels depending on our relationship with you, for example if:

- You request an insurance quotation from us, either directly or via an intermediary;
- You purchase, change or cancel an insurance policy;
- You are named on the insurance policy of our client;
- We receive notification of a claim that is made against you or that you bring against one of our policyholders;
- You are a client of a business that we acquire;
- You contact us in writing or speak to us on the phone;

- You visit one of our stands at a show or trade fair;
- You give permission to other companies to share your information with us;
- Your information is publicly available through sources such as regulatory or company registers, which we may need to consult in order to satisfy our due diligence processes for new and existing clients;
- We are provided with your information from your employer or intermediary when they complete one of our proposal forms or questionnaires;
- We are provided with your personal data by other third parties including anti-fraud and crime-prevention agencies, credit reference and vetting agencies, and other data providers.

7. Our purposes for processing

We process personal data for the following purposes:

- to provide you or our clients with a (re)insurance quotation;
- to start, change, administer or cancel a (re)insurance policy;
- to manage any claims which arise;
- to answer any queries our clients or their third party individuals may have, action requests or perform any debt recovery;
- to fulfill your rights under data protection laws;
- to handle complaints about data privacy or our financial products and services;
- to manage and respond to requests and/or queries from the applicable regulatory or judicial authority (including authorities outside of the location in which personal data is collected);
- to cooperate with internal and external audits being conducted on us;
- to comply with other legal requirements such as preventing money laundering and other financial crimes and for statutory / regulatory reporting purposes;
- to offer a renewal;
- to detect and prevent fraud;
- to carry out due diligence or other screening activities in accordance with legal or regulatory obligations or risk management procedures that may be required by law or internal compliance policies and procedures;
- for statistical analysis in order to monitor and improve our business and our products and services;
- to demonstrate compliance with applicable laws and regulations;
- to market our services.

8. Marketing

We will generally only send marketing communications to individuals in their professional capacity as a representative of their employer, and to invite them to seminars or events that we consider to be relevant to them. We generally do not send marketing communications to individuals in their personal capacity, and where required by relevant data protection laws, we would obtain your prior specific consent to use your contact information in such a manner.

9. Who do we share personal data with

Below are the categories of third parties we may share your personal data with for the purposes described under Section 7:

- Other Howden Group companies;
- (Re)insurers and intermediaries including but not limited to other Insurance Brokers and Managing General Agencies;
- Risk Management Assessors, Uninsured Loss Recovery Agencies and Third Party Administrators who work with us to help manage the (re)insurance process and administer our policies;
- Service Providers who help manage our IT and back office systems, or who provide platforms and portals for administering policies and member details;
- Our regulators and law enforcement agencies (including authorities outside of the location which personal data has been collected);
- Credit reference agencies, Premium Finance Providers, and organisations working to prevent fraud in financial services;
- Solicitors (who may be legal representatives for you, us or a third party claimant) and other professional services firms (including our auditors);
- Marketing fulfilment, webinar and customer satisfaction service providers, acting on our behalf in facilitating online events, providing marketing communications and capturing feedback from our customers on our service levels;
- Claims Experts who work with us to help manage the claims process;
- Potential purchasers of our businesses.

You may contact us using the contact details set out in Section 4 for more information about these third parties,

10. Sharing data with the Howden Group

As stated in the previous section, we may share personal data with other companies within the wider Howden Group for the following purposes:

- To receive administrative support from those companies, such as the receipt of IT, HR, Finance and Compliance services;
- So that these companies can provide market insight to insurers on a confidential basis, but only where personal data has been aggregated or anonymised; and
- So that we can offer you services that may be available from another company in the Howden Group, but only if permitted under marketing laws.

We will only share the minimum amount of personal data required to achieve these purposes, ensuring that we have a lawful basis to share personal data and that any processing undertaken on our behalf is governed by a data processing agreement.

11. International data transfers

For business purposes, to help prevent/detect crime or where required by law, we may need to transfer, or allow access to, your personal data to the aforementioned parties who may be based overseas.

Before we transfer personal data overseas, we will meet the applicable data protection requirements that apply to cross-border transfers of personal data. These requirements vary depending on the data protection regulation that may apply to a given transfer, but generally require us to adopt contractual, technical, organizational and physical security measures with the overseas recipient in order to ensure a comparable level of protection for your personal data.

12. Retaining personal data

We will retain your personal data only for as long as is necessary to fulfil the purpose as set out earlier in this Privacy Notice, or as required by laws and regulations. We maintain a data retention policy which we apply to records in our care. Where your personal data is no longer required, we will ensure it is either securely deleted or stored in a secured manner and that it will no longer be used by the business.

13. Your rights

Data Protection laws give you rights relating to your personal data. This section provides an overview of your data rights and how these vary by country. Your exercise of these rights is subject to the extent provided for in the applicable data protection laws. If you exercise any of these rights we will check your entitlement and respond in most cases within a month:

Location	Data Rights	Description
Australia, Mainland China, Hong Kong, Singapore & Taiwan	Right to access	You have a right to inquire whether we are processing your personal data and, if we are, request copies of the personal data we hold on you, along with an explanation of personal information handling rules such as the ways in which the personal data has been or may have been used or disclosed by us. This right always applies, but there are some instances where we may not be able to provide you with all the information we hold. If this is the case, we will confirm why we are unable to provide it - unless there is a valid legal reason that means we cannot let you know why
	Right to supplement or correct	If personal data we hold is inaccurate or incomplete, and this has an impact on the way we are using your data, you have the right to have any inaccuracies corrected and for any incomplete data to be completed. If you ask us to rectify your personal data, we will either confirm to you that this has been done, or if there is a valid reason that this cannot be done, we will let you know why
	Right to object to direct marketing	You can object to receiving direct marketing from us, for example by clicking on the unsubscribe link in any marketing email you receive from us. If you do so, we will ensure that you do not receive such material going forward, unless you change your mind and specifically request it in the future
	Right to withdraw consent	You have the right to withdraw your consent where we rely on this in order to process your personal data, and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above. We will inform you of the consequence of withdrawing consent prior to processing your request. While Taiwan data protection law does not provide for an explicit right to withdraw consent, you can ask us to stop the collecting, processing or use of your personal data.

Location	Data Rights	Description
Mainland China and Taiwan	Right to erasure	You have the right to request that your personal data is erased in certain circumstances. If you ask us to erase your personal data, we will either confirm to you that this has been done, or if we are unable to delete it, let you know why and also inform you how long we will hold it for.
	Right to restrict the processing of your data	You can ask us to restrict or terminate the collection, processing and use of your personal data (to the extent that such personal data is not necessary for us to conduct business). If you do so, we will either confirm to you that this has been done, or if we are unable to do so, we will inform you why
Mainland China	Right to data portability	In certain circumstances, you have the right to request that your personal data be transferred to a third party designated by you. Your personal data can be compiled into a common, machine readable format and either provided directly to you or sent by us to a third party you nominate. If you request this, we will either act upon your instruction and confirm to you that we have done so, or if there is a valid reason that this cannot be done, we will tell you why
	Right to object to automated decision-making	You have the right to ask us to explain where automatic decision-making has a significant impact on your rights and interests. You can object to decisions made about you using your personal data undertaken by purely automated means. If you do so, we will arrange for someone to assess the automated decision and confirm the outcome of this assessment to you.

For more details of your rights as permitted under the applicable data protection laws, you may refer to the following websites of the governing authorities:

Location	Governing Authority & Website
Singapore	Personal Data Protection Commission https://www.pdpc.gov.sg
Hong Kong	Office of the Privacy Commissioner for Personal Data, Hong Kong https://www.pcpd.org.hk
Australia	Office of the Australian Information Commissioner https://www.oaic.gov.au
Taiwan	National Development Council https://www.ndc.gov.tw
Mainland China	Cyberspace Administration of China https://www.cac.gov.cn

Appendix – Company Details

Legal Entity & Company Reg No.	Address	Regulated by
Singapore Howden Specialty Asia Pacific Pte. Ltd. (200907156H)	79 Robinson Road, #13-02, Singapore 068897	Monetary Authority of Singapore
Hong Kong Howden Specialty Limited t/a Howden Tiger (462011)	35/F Citicorp Centre, 18 Whitfield Road, Causeway Bay, Hong Kong	Insurance Authority
Australia Howden Reinsurance Brokers (Australia) Pty. Limited t/a Howden Tiger (626046393)	Level 19, 25 Bligh Street, Sydney, NSW 2000, Australia	Australian Securities & Investments Commission
Taiwan Howden International Broking Limited, Taiwan Branch (28972672) Howden Specialty (Taiwan) Limited (90009848)	12F-1, No. 51, Sec. 2, Keelung Road, Xinyi District, Taipei, Taiwan	Financial Supervisory Commission, Insurance Bureau
Mainland China Howden Specialty Limited Beijing Representative Office (91110000671703591P)	Regus IFC Centre, Office 1065, 10/F, IFC East Tower, 8 Jianguomenwai Avenue, Beijing 100022	China Banking and Insurance Regulatory Commission

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