

Privacy Notice

Howden Bermuda

HOWDEN

1. Introduction

Howden Bermuda Limited (“we”, “us”, “our”) is 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 (re)insurance broking services, we need to collect, process and share information, including information which may identify individuals.

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;
- “data controller” means an organisation that decides why and how to collect personal data from or about an individual;
- “data processor” means an organisation that is engaged by a data 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;
- “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 individuals (“you”, “your”, “data subjects”) where we hold your personal data:

- Directors, authorized personnel, beneficial owners, other associates of, or persons exercising control over, prospective, current and former clients or intermediaries that we do business with;
- Individuals who contact us with a query, concern or complaint;
- Individuals who request information from us or permit us to contact them for marketing purposes.

4. Our details

We are a data controller, and our registered office is at Chevron House, 11 Church Street, Hamilton, HM11, Bermuda. Our Registered Company Number is 37883 and we are licensed by the Bermuda Monetary Authority.

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 Privacy Officer at DPO@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:

- **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;
- **Policy and claims information:** for example, claims made via us or previous claims history which may identify you;
- **Payment and account data:** for example, your bank account details, credit/debit card details if 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.

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 or agree to take out a service through us on behalf of a company, either directly or via an intermediary;
- 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. Why do we process personal data

We process personal data for the following purposes:

- to provide our clients with a (re)insurance quotation;
- to start, change, administer or cancel an insurance policy;
- to manage any claims which arise;
- to answer any queries our clients or their associated representatives may have, to action requests or perform any debt recovery;
- to fulfil your rights under data protection laws;
- to handle complaints about data privacy or our financial products and services;

- managing and responding 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 satisfy 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; and
- to market our services

8. 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 above:

- 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.

9. 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.

10. International data transfers

For business purposes, to help prevent/detect crime or where required by law or regulation, we may need to transfer, or allow access to, your personal data to parties based outside of Bermuda. If the level of protection afforded by the law of the jurisdiction where we transfer your data is not comparable with Bermuda data protection law, we will ensure that the recipient enters into a formal legal agreement that reflects the standards required.

11. Retaining personal data

We will retain your personal data only for as long as is necessary to fulfil the purpose as set out in Section 7, or as required by applicable laws. In most cases this will be for seven (7) years following the end of our relationship with you however, in some circumstances we may retain your personal data for longer periods of time, for instance;

- Where we are required to do so in accordance with legal, regulatory or accounting rules;
- So that we have an accurate record of your dealings with us in the event of any complaints or challenges;
- If we reasonably believe there is a prospect of litigation relating to your personal dealings.

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 way which means it will no longer be used by the business.

12. Your rights

Data protection law gives you rights relating to your personal data. Should you wish to enforce a right (generally at no cost to you), or make a data protection complaint, please contact DPO@howdengroup.com. We aim to provide a final response within one month of receiving a request, unless the request is particularly complex in which case we will let you know when we expect to complete it by:

- **Your right of access** - You have a right to request copies of the personal data we hold on you, along with meaningful information on how it is used and who we share it with. There are some instances where we may not be able to provide you with all the information we hold, and in such instances we will confirm why unless there is a valid legal reason that means we cannot;
- **Your right to rectification** - 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;
- **Your 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;
- **Your right to ask us to cease or not to begin processing** – This right is absolute where the processing of your personal data is for the purposes of advertising, marketing, public relations. This right also applies where the processing is causing (or is likely to cause) substantial damage or distress to an individual, and in this scenario we will either confirm to you that this has been done, or provide a justified reason for continuing with the processing.

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