

PRIVACY POLICY

Certa processes personal information. This Privacy Policy summarises our policies with respect to personal information that we process of clients and insureds, beneficiaries of insurance products, and representatives of clients, insureds and other businesses that we interact with who are European natural persons (the “Data Subjects”). This Privacy Policy sets out the kinds of personal information we collect and how that personal information is used. Please read the following carefully to understand our views and practices regarding Data Subjects’ personal information and how we will treat it.

Personal Information Collected

We receive personal information from Data Subjects which includes:

- *Category 1* – Contact information, such as name, title, address, business and/or personal telephone number, and business and/or personal email address.
- *Category 2* – Verification information, such as passport, driver’s licence, utility bill, credit or bank card statement, wire transfer information, country of residence, country of origin/nationality, country of domicile/tax residency, tax reference number, date of birth, and occupation. Insurance application information, which may contain sensitive personal data such as medical information where that data is required to place and service your insurance contract.
- *Category 3* – Finance-related information, such as the amount of insurance coverage and details of the insurance.
- *Category 4* – Work contact information, such as name, title, name of the business the Data Subject works for, business address, business telephone number, and business email address.
- *Category 5* – Data gathered by our website(s) visited by Data Subjects that pertains to Data Subjects’ usage of such website(s).

Purposes for Processing Personal Information

We use the personal information held about Data Subjects for the following purposes:

- *Categories 1 and 5* – To carry out our obligations arising from any agreement entered into with us by or on behalf of Data Subjects, including to contact such individuals (including with information or messages about the insurance product), and for administrative purposes.
- *Category 2* – To complete anti-money laundering checks, verification checks and other checks as are required by law, which, if not conducted, means that we will be unable to carry out our obligations arising under any agreement.
- *Category 3* – To tailor our advice and services to Data Subjects.
- *Category 4* – To communicate with our institutional clients and other businesses through their natural person representatives.

Lawful Basis for Processing Personal Information

The lawful basis/bases that we rely upon to process personal information held about Data Subjects is as follows:

- *Category 1* – We use this personal information to carry out our obligations arising from our agreement with Data Subjects, to take steps at Data Subjects' request prior to entering into an agreement, and to send informational messages to clients and insureds to the extent allowed by applicable law and which are in our legitimate interests.
- *Category 2* – We use this personal information carry out our obligations arising from our agreement with Data Subjects, to comply with our legal obligations, where it is necessary for reasons of substantial public interest and where it is necessary for insurance purposes, or otherwise with your explicit consent.
- *Categories 3 and 4* – We use this personal information to carry out our obligations arising from the agreement entered into by or on behalf of Data Subjects, and where it is necessary for the purposes of the legitimate interests pursued by us that are not overridden by the interests or fundamental rights and freedoms of Data Subjects.
- *Category 5* – We use this personal information to carry out our obligations arising from the agreement entered into by Data Subjects, where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, in order for us to operate our website it is necessary for us to collect certain data about you to improve your user experience and manage the website. In addition, we use this personal information to send informational messages to clients and insureds to the extent allowed by applicable law and which are in our legitimate interests. Please also refer to our [Cookie Notice] about how we use cookies.

Disclosure of Personal Information

We do not disclose any personal information about Data Subjects to any third parties, except:

- as reasonably necessary or appropriate in connection with the management of the funds,
- to processors who are only permitted to use it to perform services for us,
- as required by law or any applicable regulatory authority, or
- to protect the rights, property, or safety of our company, its clients or others.

In these cases, we may share personal information with legal advisers, insurance carriers, other insurance brokers, accountants, fund administrators, regulators, companies engaged to dispose of or store data including personal information, and adverse parties who have a legal right to receive such information and their counsel, experts and legal advisers.

We will take reasonably necessary steps to ensure that where personal information is shared, it is treated securely and in accordance with this notice and applicable laws.

Personal Information Retention

We will endeavour not to keep personal information in a form that allows a Data Subject to be identified for any longer than is reasonably necessary for achieving the permitted purposes. At the end of the applicable retention period, we may destroy, erase from our systems, or anonymise personal information as part of such efforts. Please refer to our retention and disposal policy for more details which is available upon request.

Storage & Transfer of Personal Information

We maintain physical, electronic and procedural safeguards designed to protect Data Subjects' personal information, prevent unlawful or unauthorised processing of personal information, and prevent unauthorized disclosure of, or accidental loss of, or damage to, such information.

We may process personal information in, and transfer personal information to, countries that may not guarantee the same level of protection for personal information as the country in which Data Subjects reside.

Personal information will also be processed by staff who work for us and operate outside the European Economic Area. This includes staff engaged in, among other things, the provision of administration and support services. All such staff are subject to appropriate confidentiality and security obligations.

We restrict access to non-public personal information about Data Subjects to those of our employees and agents who need to know the information to enable us to provide services.

We will only transfer personal information to third party service providers if they agree to comply with the physical, electronic and procedural safeguards described above, or if they put in place adequate measures themselves.

Rights in relation to Personal Information

Data Subjects have certain rights in relation to their personal information, including the right to be informed about the collection and use of their personal information, as outlined in this Policy.

These include, where certain conditions are met:

- the right to request access to the personal information we hold about them,
- the right to have inaccurate information about them amended or updated,
- the right to object to processing of personal information about them,
- the right to withdraw consent at any time (where relevant),
- the right to have personal information about them erased or to restrict processing in certain limited situations,
- the right to data portability and to request the transmission of personal information about them to another organisation,

- the right to object to automated decision making that materially impacts them, direct marketing, and processing for research or statistical purposes, and
- the right to lodge complaints with applicable data supervisory authorities.

Data Subjects should use the contact information below to get more information and/or to make a formal request.

We will endeavour to keep the personal information we store about Data Subjects reasonably accurate and up-to-date by enabling clients and insureds to correct it by request. Data Subjects should notify us if any of their personal information changes or if they become aware of any inaccuracies in the personal information we hold about them.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time and without prior notice.

Questions

If Data Subjects have any questions in relation to this Privacy Policy, please get in touch with your usual contact who will refer to our Data Protection Officer – Edward.beckwith@certainsurance.com