Privacy Notice

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Contents

What does this Privacy Notice apply to?	3
Your rights	3
What information do we collect?	4
How do we use your information?	5
The use of your personal data for marketing purposes	6
The use of special categories of personal data	7
Retention of your personal data	7
Transferring your personal data	7
Safeguarding your personal data	7
Who do we share your personal data with?	8
What happens if our business changes hands?	8
How you can access your information and correction	9
Contacting us	9
Data Protection Complaints	9
Your right to complain	10
Changes to our Privacy Notice	10

What does this Privacy Notice apply to?

This Privacy Notice applies to personal data collected and/or processed by companies within the Specialist Risk Group ("SRG") in the UK and Ireland, in connection with the services and products we offer. This includes information collected offline through our direct marketing campaigns and other business operations and online through our websites, applications and branded pages on third party platforms.

This Privacy Notice is hereby incorporated into and forms part of our general terms of trade and the terms and conditions of use of any applicable SRG website. A full list of the Specialist Risk Group of companies in the UK and Ireland is available here.

References to "SRG", "we", "us" and "our" refer to the relevant SRG entity or entities responsible for collecting and/or processing your personal data, depending on the services you receive and/or use and the entity you engage with. The SRG entity responsible for your personal data will be identified in your correspondence, contractual documentation, terms of business, policy documentation, or other communications provided to you. In most circumstances, the relevant SRG entity will act as a data controller, meaning it determines how and why your personal data is processed.

In certain situations, SRG entities may process personal data on behalf of clients, insurers, intermediaries, or other third parties. Where this applies, the relevant SRG entity will act as a data processor and will process personal data in accordance with applicable legal and contractual requirements.

As part of providing insurance and risk-related services, we may collect, use, and share personal data with insurers, reinsurers, brokers, service providers, regulators, and other participants within the insurance market in accordance with applicable data protection laws.

Our websites may contain links to other websites. Please note that we have no control over how your personal data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

Your rights

As a data subject, you have the following rights under Data Protection Law (the applicable law and regulation relating to the processing of personal data) which this notice and our internal policies are designed to facilitate:

1. The right to be informed about our collection and use of your personal data;
2. The right to request a copy of the personal data we hold about you (see **How you can access your information and correction**);
3. The right to have any personal data we hold about you that is inaccurate or incomplete rectified;
4. The right to ask us to delete any personal data we hold about you;
5. The right to restrict the processing of your personal data;
6. The right to obtain a copy of your personal data and to transfer it to another organisation;
7. The right to object to us using your personal data for particular purposes; and
8. Rights with respect to automated decision making and profiling including the right to request human review of such decisions where applicable.

If you have any questions, comments or concerns about our use of your personal data, or you wish to exercise any of the rights listed above, please contact us using the details provided (see **Contacting us**).

If you are dissatisfied with our response, you have the right to make a complaint to the relevant supervisory authority.

United Kingdom: the Information Commissioner's Office (see **Your right to complain**).

Republic of Ireland: Data Protection Commission (see **Your right to complain**).

What information do we collect?

In this privacy notice, your "personal data" means information that could be used to identify you. In order for us to provide insurance quotes, insurance policies, and/or deal with any claims and for crime prevention, we need to collect and process personal data about you. The types of personal data we collect and process may include:

Information you provide to us directly:

Types of personal data	Details
Individual details	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you
Identification details	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number
Financial information	Bank account or payment card details, income or other financial information
Risk details	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to your health, criminal convictions, or other special categories of personal data. For certain types of policy, this could also include telematics data
Policy information	Information about the quotes you receive and policies you take out
Credit and anti-fraud data	To help us assess applications, verify identity, prevent fraud, and meet our legal and regulatory obligations, we may obtain information about you from credit reference agencies (CRAs). We obtain this information via Creditsafe, which uses its data partner, TransUnion, to provide consumer credit and identity data. The information we receive may include, your identity and contact details, your credit history and financial commitments, payment behaviour and public record information (for example, County Court Judgments or insolvency data). We use this data for legitimate business purposes, including, assessing creditworthiness, verifying identity, preventing and detecting fraud and meeting legal and regulatory requirements. Our legal bases for processing this data are for legitimate interests (to ensure responsible lending and prevent fraud), and compliance with legal obligations, where applicable. Further information about how Creditsafe and TransUnion process your personal data can be found in their respective privacy notices: • TransUnion Bureau Privacy Notice: TransUnion Bureau Privacy Notice | An Information & Insights Company • Creditsafe Privacy / Transparency Notice: *Transparency Notice | Customers & Suppliers* TransUnion CRAIN (Credit Reference Agency Information Notice): https://www.transunion.co.uk/legal/privacy-centre/pc-credit-reference
Previous and current claims	Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data and in some cases, surveillance reports
Special categories of personal data	Certain categories of personal data which have additional protection under the GDPR. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation

Information collected automatically when you use the SRG websites

We (and third-party service providers acting on our behalf) use cookies and other tools (such as web analytics tools and pixel tags) to automatically collect information about you when you use SRG websites, subject to the terms of this Privacy Notice and applicable data laws and regulations. The types of information collected automatically may include:

- information about the type of browser you use
- details of the web pages you have viewed
- your IP address
- the hyperlinks you have clicked
- your username, profile picture, gender, networks and any other information you choose to share when using Third Party Sites (such as when you use the "Like" functionality on Facebook or the +1 functionality
- the websites you visited before arriving at a SRG site

How do we use your information?

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you or arranged for you, because you have consented to our use of your personal data or because it is in our legitimate interests.

We set out below the purposes we and other insurance market participants may collect, use and process personal data. (see **Who do we share your personal data with?)**

Purpose	How we use your personal data	Lawful basis
Quotation and Inception:	• Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks. • Evaluating the risks to be covered and matching to appropriate policy/premium. • Payment of premium where the insured/policyholder is an individual.	• Performance of a contract. • Legitimate interests. • Compliance with a legal obligation (where applicable).
Policy administration:	• Client care, including communicating with you and sending you updates. • Payments to and from individuals.	• Performance of a contract. • Legitimate interests.
Claims Processing:	• Managing insurance and reinsurance claims. • Defending or prosecuting legal claims. • Investigation or prosecuting fraud.	• Performance of a contract. • Legitimate interests. • Compliance with a legal obligation.
Renewals:	• Contacting the insured/policyholder to renew the insurance policy. • Evaluating the risks to be covered and matching to appropriate policy/premium. • Payment of premium where the insured/policyholder is an individual.	• Performance of a contract. • Legitimate interests.
Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period:	• Complying with our legal or regulatory obligations. • General risk modelling. • Transferring books of business, company sales and reorganisations.	• Performance of a contract. • Legitimate interests. • Compliance with a legal obligation.

Marketing:	• Sending you information about other SRG products and services we believe may be of interest to you. • Sending you risk management information that we believe may help you to identify and mitigate the risks in your business.	• Legitimate interests. • Consent, where required by applicable law.
Improving our services	• Developing our services through research and development. • Monitoring and improving our systems, websites, and our content on social media platforms. • Improving quality, training, and security.	• Legitimate interests.

Where we process special category personal data (such as health information in connection with insurance policies or claims), we will do so only where a valid legal basis and condition for processing applies under applicable data protection laws. This may include processing that is necessary for insurance purposes, the establishment, exercise or defence of legal claims, reasons of substantial public interest, or where your explicit consent has been obtained, where required.

For a more detailed explanation of how we will use your personal data for marketing purposes see **"The use of your personal data"** for marketing purposes. For details of how we use special categories of personal data see "**The use of special categories of personal data**."

The use of your personal data for marketing purposes

If you are a customer, we will on occasion use your name and email address to send you information about other SRG products and services that we believe may be of interest to you. We may also send you information, insights, and guidance relating to risk management that may help you identify, manage and mitigate the risks affecting your business. Your personal data will only be used by companies within SRG for this purpose and will not be shared with third parties.

Your right to object

You have the right to object to our use of your personal details for direct marketing purposes whereupon we will cease such activity immediately. If you exercise this right, we will stop sending you marketing communications. You can opt out of marketing communications by contacting us using the details below.

- Email: Dataprivacy@specialistrisk.com
- Website: www.specialistrisk.com

You can also unsubscribe by using unsubscribe link included in our electronic marketing communications.

The legal basis for using your personal details for direct marketing

Where permitted by applicable law, we rely on our legitimate interests to send marketing communications relating to our products, services, and risk management activities. When we process information for our legitimate interest, we make sure to consider and balance any potential impact on you and your rights under data protection laws. We will not use your personal data for activities where our interests are overridden by yours, unless we have your consent or are otherwise required or permitted by law.

Marketing to individuals

The UK Privacy and Electronic Communications Regulations (PECR) and the EU ePrivacy Directive require that electronic marketing communications are not sent to individuals unless they have consented to receive such material, or a statutory exemption applies. Where consent is given, it may be withdrawn at any time.

SRG uses the "soft opt-in" process and customer exemptions available under both PECR and Article 13(2) of the EU ePrivacy Directive. This means we can send marketing texts or emails if:

1. we obtained your contact details in the course of a sale (or negotiations for a sale) of a product or service
2. the marketing relates to our own similar products or services; and

3. you were given the opportunity to refuse or opt out when your details were collected and in every subsequent marketing communication. Where you purchase insurance through SRG via our call centre or online we will ask for your consent to send you marketing communications.

4. the sale took place no more than 12 months before the marketing communication is sent, or your details have been used to send you marketing within that 12-month period.

The use of special categories of personal data

In some circumstances, we (and other insurance market participants) may need to collect and use special categories of personal data (e.g. health information) or information relating to criminal convictions and offences. Where this is required, we will only process this information where permitted by applicable data protection law. In many cases, this will be because the processing is necessary for insurance purposes, such as advising, arranging, underwriting, handling a claim or exercising a right or complying with an obligation under, an insurance contract. We will ensure that the processing of the special category data is necessary and proportionate for that purpose.

In certain circumstances we may need your consent to process such information. Where your consent is required, we will request it separately and you do not need to give your consent and may withdraw it at any time. However, if you do not give your consent, this may affect our ability to arrange and administer the insurance cover from which you benefit and may prevent us from arranging cover for you or handling your claims.

Retention of your personal data

We will keep your personal data only for so long as is necessary and for the purpose for which it was originally collected. This will be in line with our internal data retention schedule, and the periods depend on the type of information, the product or service provided, legal and regulatory requirements and whether the information may be needed for complaints, claims or fraud prevention.

Transferring your personal data

We may need to transfer your personal data outside the UK and/or the EEA to provide services, support our business operations, or work with insurers, brokers, service providers or other insurance market participants. Where we transfer personal data internationally, we will make sure appropriate safeguards are in place. These may include adequacy regulations European Union Standard Contractual Clauses (EU SCCs), UK addendum to EU SCCs or other lawful transfer mechanisms.

Safeguarding your personal data

We are committed to protecting the security of your personal data and take appropriate technical measures to safeguard it against unauthorised and unlawful processing. We also require any third parties that handle or process your personal data on our behalf to implement appropriate security measures and comply with our data protection and information security requirements. We operate an ongoing third-party assurance programme which monitors, audits and evaluates such parties and ensures they meet our security and compliance standards.

Access to your personal data is restricted to prevent unauthorised access, modification or misuse and is only permitted among our employees and agents on a need-to-know basis. In order to prevent unauthorised access or disclosure, we

have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect offline and online.

Who do we share your personal data with?

In order for us to provide insurance quotes, arrange insurance policies, and/or deal with any claims or complaints, we may need to collect, process and share your personal data with third parties. These may include insurance intermediaries, insurers, reinsurers, loss adjusters, contractors, agents and group companies that perform activities on our behalf.

As explained, insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, insurers and reinsurers. The Lloyd's Market Core Uses Information Notice sets out those core necessary personal data uses and disclosures. Our core uses and disclosures are consistent with the Lloyd's and London Market Core Uses Information Notice. We recommend you review this notice.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.

Where you have been referred to SRG by a third party we may pay them a commission. To enable the third party to reconcile any commission payments it is due we may also share your personal data with them for this purpose. We will not provide them with any personal data they do not already possess as part of their existing business relationship with you, other than the month of a policy inception or renewal giving rise to a commission payment. SRG has determined that this processing is necessary for the performance of its legitimate business interests and is within the reasonable expectation of the referred commercial clients. It has also undertaken an assessment of the impact of such processing on your privacy and has concluded that such impact is minimal. If you have any concerns about the processing of your personal data for this purpose, please contact our Data Protection Officer by using the contact details in **Contacting us**.

Information obtained during the course of negotiating a claims settlement on behalf of a client may be used in the negotiation of a claim with the same insurer for another SRG client or clients. The information will only be shared with the common insurer and enables us to provide a more effective claims handling service to our clients without compromising the confidentiality of client information. SRG has determined that this processing is necessary for the performance of its legitimate business interests.

We may also share anonymised data with third party companies across borders for the purpose of your interactions with us, to improve the services we provide by using data analytics. All transfers of personal data will comply with applicable law and will be subject to appropriate safeguards.

What happens if our business changes hands?

SRG may, from time to time, buy, sell, reorganise, merge or otherwise transfer parts of its business. Where this occurs, we may expand or reduce our business, and this may involve the sale and /or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part.

Any such transfer will only take place where it is lawful to do so, and appropriate safeguards are in place. The recipient of the personal data will be permitted to use it only for the purposes for which it was originally collected and in accordance with applicable data protection laws.

Where required by law, we will take appropriate steps to notify you of any significant changes affecting the processing of your personal data.

How you can access your information and correction

You have the right to request confirmation of whether we process your personal data and, where we do, to obtain a copy of that information. In most cases no fee is payable, and we will provide the information in response to your request free of charge. We may charge a reasonable fee or refuse to act on a request where it is manifestly unfounded or excessive, particularly if it is repetitive as permitted by applicable data protection laws. If you wish to exercise your right of access, please contact us using the details provided in the "**Contacting us"**.

We want to make sure that your personal data is accurate and up to date. You may request us to correct or remove information you think is inaccurate or incomplete and in certain circumstances, you may also request that personal data be deleted (see Your Rights).

Contacting us

Please contact us if you have any questions about this Privacy Notice or the information we hold about you:

- By email: Dataprivacy@specialistrisk.com • By telephone: 020 7977 4800
- Or write to us at:
- UK: Data Protection Officer, Specialist Risk Group Limited, The St Botolph Building, 138 Houndsditch, London, England, EC3A 7AW
- IE: Data Protection Officer, Specialist Risk Europe Limited, 16 Fitzwilliam Place, Dublin 2, D02 FF82

Data Protection Complaints

SRG is committed to protecting personal data and complying with applicable data protection law. If you have concerns about how we have collected, used, disclosed, retained, secured or otherwise processed your personal data, or about how we have handled a request relating to your data protection rights, you may raise a complaint with us.

A data protection complaint may relate to our processing of your personal data, direct marketing communications, the handling of a data protection rights request, or any actual or suspected failure to comply with applicable data protection law.

We will acknowledge receipt of your complaint and take appropriate steps to investigate and respond without undue delay. This may include making enquiries, keeping you informed of progress where appropriate, explaining the outcome of our investigation, and outlining any action taken or proposed.

Where a complaint is submitted on behalf of another individual, we may request evidence that the person submitting the complaint is authorised to act on that individual's behalf.

Please note that a data protection complaint and a request to exercise a data protection right are legally distinct. Where correspondence contains both, we will manage each element in accordance with the relevant legal and regulatory requirements.

Your right to complain

Nothing in our complaints process prevents you from making a complaint directly to the relevant supervisory authority. If you are dissatisfied with how we process your personal data, our handling of your data protection rights, or our response to a complaint, you may contact the relevant supervisory authority at any time.

We encourage you to contact us first using the details provided in this Privacy Notice so that we have the opportunity to address your concerns. However, you are not required to do so before contacting a supervisory authority.

United Kingdom	Republic of Ireland
• The Information Commissioners Office (ICO), Wycliffe House, Water Lane Wilmslow, Cheshire SK9 5AF • Tel: 0303 123 1113 (local rate) or 01625 545 745 Email: casework@ico.org.uk Webform: here	• Data Protection Commission (DPC) 21 Fitzwilliam Square South Dublin 2 D02 RD28 Tel: (01) 765 01 00 • Webform: here

Changes to our Privacy Notice

We may update this Privacy Notice from time to time to reflect changes to our business practices, legal or regulatory requirements or the service we provide you. Any updates will be published on the SRG websites and will take effect from the date of publication, unless otherwise stated. Where changes are material, we will take reasonable steps to notify you, for example by email, through our websites, or by other appropriate means.

We encourage you to review this privacy notice periodically to stay informed about how we collect and use your personal data.

Confidentiality of Information
No part of this document may be reproduced, stored in a retrieval system, or transmitted in any way or by any means, including photocopying or recording, without the written permission of the copyright holder, application for which should be addressed to the copyright holder. This document constitutes confidential and proprietary information belonging to Specialist Risk Group. Any other disclosure and/or use are strictly prohibited and Specialist Risk Group reserve the rights, amongst others, to take such action as is necessary to protect its confidential and proprietary information.

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