

## Privacy Notice

Howden Specialty

Dubai International Financial Centre

December 2021



# Our commitment to privacy

**This Privacy Notice describes how the Dubai International Financial Centre (DIFC) branch of Howden Insurance Brokers Limited ("HIBL") ("we", "us", "our", "Howden Specialty") collects, processes and uses information which may identify individuals ("personal data"), including insured persons, associated individuals and claimants. We understand our responsibilities to handle personal data with care, to keep it secure and to comply with applicable data protection laws.**

The purpose of this Privacy Notice is to provide you with a clear explanation surrounding how and why we collect and use your personal data, and to explain your legal rights with respect to your personal data. It is not intended to override the terms of any agreement or other contract which you have with us or any rights you might have available under applicable data protection laws.

We may amend this Privacy Notice from time to time for example, to keep it up to date or to comply with legal requirements or changes in the way we operate our business. We will notify you about material changes by prominently posting a notice on [www.howdenspecialty.com](http://www.howdenspecialty.com). We encourage you to potentially check back and review this Privacy Notice so that you will always know what information we collect, how we use it, and with whom we share it.

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## 1. Who is responsible for your personal data?

The DIFC branch of HIBL is a Data Controller and our registered office is at Unit The Exchange - GV-00-11-01-OF-07-0, Level 1, Gate Village Building 11, Dubai International Financial Centre, Dubai, United Arab Emirates PO Box 482078. Our DIFC Registered Number is 4354 and we are authorised by the Dubai Financial Services Authority (DFSA) under Reference Number F006564.

HIBL is a subsidiary of Howden Broking Group Limited (“HBG”), part of the Howden Group, which is a UK-registered holding company for a number of insurance intermediary entities that operate in many territories including Europe, UK, Asia, Middle East, Latin America, India and Africa.

## 2. Who does this Privacy Notice relate to?

This Privacy Notice relates to the **following types of individuals (“you”, “your”, “data subjects”)**, about whom we may collect 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;
- Visitors to our website;
- 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.

There are types of individuals who this Privacy Notice does not relate to, for example our employees and sub-contractors (including prospective and former employees and sub-contractors). If you are one of these individuals and would like further information on how we collect, use and store your information, please contact us using the contact details set out in **Section 11**.

### 3. What personal data do we collect?

We collect different types of personal data depending on your relationship with us and how you have interacted with us. This can include information we receive from other third parties. Depending on your relationship with us, **we may hold the following types of personal data about you:**

- **Identity and contact data:** for example, your name, date of birth, postal address, telephone number and e-mail address;
- **Claims data:** for example, data relating to claims made via us, or your previous claims experience;
- **Payment and account data:** for example, your bank account details or brokerage fees;
- **Location data:** for example, your postal or IP address, the location of any insured property, and in the event of a claim, where the incident occurred;
- **Correspondence data:** for example, letters and e-mails sent to us, and notes or call recordings of any telephone conversations;
- **Internet data:** for example, information collected by cookies and other online technologies such as Google Analytics, as you use our website or contact us by online methods;
- **Information we obtain from other sources:** for example from credit agencies, anti-fraud and other financial crime prevention agencies or data providers;
- **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.

#### Special Category Data

Certain types of information are known as **special category data**, for example information that reveals your health or medical conditions, criminal conviction history, race or ethnicity, your political views or your religious beliefs. We will only collect this information where we have a legal basis for doing so, and where it is strictly necessary, such as:

- When it is relevant to the type of insurance that has been enquired about or purchased;
- When it is relevant to a claim you have made, or that someone else has made against you; or
- Where it is relevant to a complaint or issue you have raised with us.

## 4. How do we collect personal data?

We collect personal data in various ways including:

- Through **direct interactions** with you, for example if you contact us through our website, by email, by post, by phone, or if you request a service from us
- Through **automated technologies such as cookies** when you visit or use our websites
- From **third parties**, for example if your employer or an intermediary completes a proposal form or questionnaire in which they provide us with your personal data. In such cases we ask them to provide you with a copy of our Privacy Notice
- From **publicly available sources**, for example to satisfy our due diligence processes for new and existing clients

## 5. Lawful bases and purposes

We are required to establish a lawful basis and purpose for collecting personal data. Typically we collect personal data:

- **To enter into or perform a contract:** for example to provide you with an insurance quotation, to start, change, administer or cancel an insurance policy, to manage any claims which arise, to answer any queries you may have, action your requests or perform debt recovery;
- **To comply with a legal obligation:** for example the rules set by the DFSA, to fulfil your data rights under data privacy laws, handle complaints about data privacy or our financial products and services, and to comply with other legal requirements such as preventing money laundering and other financial crimes;
- **For our legitimate business interests:** for example to share data internally for administrative purposes, to improve our products and services, or to carry out analytics across our datasets. Where we rely on this lawful reason, we assess our business needs to ensure they are proportionate and do not affect your rights. In some instances, you have the right to object to this kind of use;
- **With your consent:** for example if you consent to us processing your personal data for a specific purpose, such as marketing;

- **To protect vital interests:** in extreme or unusual circumstances, we may need to use your information to protect your life or the lives of others.

### Special Category Data

The processing of special category data requires an additional lawful basis. If and where we collect this type of data, our additional lawful basis will typically be:

- your explicit consent;
- the establishment, exercise or defence of legal claims; or
- to comply with anti-money laundering or counter-terrorist financing laws.

**PLEASE NOTE** – Where our lawful basis of processing is your explicit consent, documentation that you need to complete will include a provision where you can indicate that consent. If you choose to withdraw your consent we will tell you more about the possible consequences, including that we may no longer be able to act as your broker of record or place or administer your policy and that you may have difficulties finding other cover. Further, we may not be able to support you in processing your claim.

## 6. Who do we share your personal data with?

We share your personal data with the following types of **third parties** if it is necessary for the purposes described in **Section 5**:

- Other Howden Group companies (including those who are in run-off but who may still carry out certain regulated activities) and our Appointed Representatives;
- Insurers or intermediaries including other Insurance Brokers and Managing General Agencies, Risk Management Assessors, Uninsured Loss Recovery Agencies, Loss Adjusters, Claims Experts and Third Party Administrators who help administer our policies and claims;
- Service Providers who help manage our IT and back office systems, or who provide platforms and portals for administering policies;

- Our regulators, as well as other regulators and law enforcement agencies around the world;
- Credit reference agencies and organisations working to prevent fraud in financial services;
- Solicitors (who may be legal representatives for you, us or a 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;
- Potential purchasers of our businesses.

### Use of information within Howden Group

We may also make your information available to other Howden Group companies whom support us in providing our services to you, for example by providing administrative, IT or infrastructure support. They may also use this information for statistical analysis, business reporting, or for business development purposes for which they may be remunerated, such as providing market insight to (re)insurers on a confidential basis. Your personal data will only be disclosed to third parties outside of the Howden Group in accordance with data protection laws, or in an anonymised and/or aggregated format, to support the purposes set out in [Section 5](#).

## 7. International 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 the DIFC. Where we do this, we will ensure that your information is transferred in accordance with the applicable Data Protection requirements.

If the Data Protection laws of the jurisdiction where we transfer your data are not recognised as being equivalent to those in the DIFC, we will ensure that the recipient enters into a formal legal agreement that reflects the standards required.

You have the right to ask us for more information about the safeguards we have put in place as mentioned above. Contact us as set out in [Section 11](#) of this Privacy Notice if you would like further information.

## 8. Automated Decision Making and Profiling

We do not undertake any automated decision-making or profiling with your personal data.

## 9. How long do we keep your personal data?

We will **retain your personal data only for as long as is necessary to fulfil the purpose as set out in Section 5**, 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. You can request a copy by contacting us on the details shown in **Section 11** of this Privacy Notice.

## 10. What are your rights?

Data Protection laws give you rights relating to your personal data. We aim to respond to any valid requests within one month unless it is particularly complicated or you have made several requests, in which case we aim to respond within three months and will let you know:

- **Your right to withdraw your consent** - You can withdraw your consent where this is our lawful basis for processing your personal data. If you choose to do so, we will tell you about any possible consequences;
- **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 object to processing** - You have the right to object to:
  - processing where we rely on our legitimate interests as the legal basis;
  - disclosure of your personal data for the first time to third parties; and
  - processing for the purposes of direct marketing.

If you do so, we will either confirm to you that the processing has stopped, or where there is a valid reason for the processing to

continue we will inform you why. In the event that you receive marketing from us, you can unsubscribe from future marketing by clicking on the unsubscribe link included in every email.

- **Your right to restrict processing** – You can ask us to restrict the use of your personal data in certain circumstances. We will either confirm to you that this has been done, or if we are unable to restrict it, we will inform you why;
- **Your right to data portability** - In certain circumstances, you have the right to request that your personal data 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.

## Exercising your rights

To exercise your rights you may contact us as set out in [Section 11](#) however please note the following:

- We take the confidentiality of all records containing personal data seriously, and reserve the right to ask you for proof of your identity if you make a request;
- We will not ask for a fee to exercise any of your rights in relation to your personal data, unless your request for access to information is unfounded, repetitive or excessive, in which case we will charge a reasonable amount in the circumstances. We will let you know of any charges before completing your request;
- We might ask if you can tell us what exactly you want to receive or are concerned about. This will help us to action your request more quickly;
- Data protection law provides for additional exemptions, in particular to the right of access, whereby personal data can be withheld from you in certain circumstances, for example to avoid prejudicing an official investigation;
- We do not have to comply with a request where it would adversely affect the rights and freedoms of other data subjects

## 11. How you can contact us

The primary point of contact for all issues arising from this Privacy Notice, including any concerns, complaints or requests to exercise data subject rights, is as follows:

- **By email:** [DPO@howdengroup.com](mailto:DPO@howdengroup.com)
- **By post:** Risk & Compliance, Howden Insurance Brokers Ltd, Unit The Exchange Gate Village 11, Office 07, Level 1, PO Box: 482078, DIFC, Dubai, UAE

