

Privacy Notice

Howden Bermuda

December 2021



Our commitment to privacy

This Privacy Notice describes how Howden Bermuda Limited ("we", "us", "our", "Howden Bermuda") collects, processes and uses information which may identify individuals ("personal data"). 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. 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?

Howden Bermuda Limited is responsible for the collection, processing and use of personal data 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.

Howden Bermuda Limited 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 around the world.

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 10](#).

3. What personal data do we collect?

We collect different types of personal data depending on 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.

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. What are the purposes of our processing?

We collect personal data for the following **purposes**:

- to provide our clients with an 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 fulfill 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;
- to market our services.

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 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 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

As noted above, we may 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 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.

8. How long do we keep your personal data?

We will **retain your personal data only for as long as is necessary to fulfil the purposes 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.

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.

9. What are your rights?

Data protection law gives you rights relating to your personal data. We aim to respond to any valid request within one month of receiving it, unless it is particularly complicated or you have made several requests, in which case we will inform you of an expected response date and the reason for the extension. Below is an overview of your rights:

- **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;

Exercising your rights

To exercise your rights you may contact us as set out in [Section 10](#), 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

10. 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 our Privacy Officer who can be contacted as follows:

- **Name:** Andrew Hall
- **Email Address:** DPO@howdengroup.com
- **Postal Address:** Risk & Compliance, Howden Bermuda Limited, Chevron House, 11 Church Street, Hamilton, HM11, Bermuda

www.howdenspecialty.com

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