

Privacy Notice

Howden Specialty DIFC

HOWDEN

1. Introduction

The Dubai International Financial Centre (DIFC) branch (“we”, “us”, “our”) of Howden Insurance Brokers Limited need to collect, process and share information, including information which may identify individuals (‘personal data’), in order to provide our insurance broking services. 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;
- “special category data” means personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, health data, sex life or sexual orientation;
- “controller” means an organisation that decides why and how to collect personal data from or about an individual;
- “processor” means an organisation that is engaged by a 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. Howden is international insurance group that supports clients while using insurance as a tool to increase resilience for individuals, businesses, and communities.
- “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 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.

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 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, your policy number, insured amounts, premiums due, relationship to the policyholder, claims made via us or your previous claims history;
- **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;
- **Special category data:** in some cases it may be necessary for us to collect more sensitive types of information, for example health-related data, as part of responding to a claim, or it may be necessary for us to collect data relating to criminal convictions or offences as part of undertaking 'know your customer' checks which are required by our regulators.

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 from us, either directly or via an intermediary;
- You purchase, change or cancel an insurance policy;
- 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. Our lawful purposes for processing

We are required to establish a lawful basis and purpose for collecting personal data. Generally we collect personal data pursuant to the following lawful bases and purposes:

- **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 provide our client (who may be your employer) with a quote or broking services, 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 marketing purposes; and
- **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.

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

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 under Section 7:

- 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 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 personal 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.

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. You can request a copy by contacting us on the details shown under Section 4 of this Privacy Notice.

12. Automated decision-making

Please note we do not undertake any automated decision-making or profiling with your personal data.

13. 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:

Access	You have a right to request a copy of the personal data that we hold on you, along with meaningful information on how it is used and who we share it with, however there are some instances where we may not be able to provide you with some or all of the information we hold. Where this is the case we will explain to you why when we respond to your request, unless the relevant laws or regulations prevent us from doing so.
Rectification	You have a right to ask us to correct inaccurate or incomplete personal data that we hold about you. 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.
Erasure	You can request that we delete your personal data in certain circumstances, for example if we no longer need the personal data for the purpose(s) for which we collected it. We will either confirm to you that this has been done, or if we are unable to delete it due to a compelling overriding reason we will let you know why.
Restrict processing	You can ask us to restrict the processing of your personal data in certain circumstances. If you do so, we will either confirm that this has been done, or if we are unable to do so, we will let you know why.
Data portability	In certain circumstances you have the right to request that your personal data be transferred to yourself or a nominated third party in a common, machine readable format. 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.
Object to direct marketing	You can object to receive direct marketing from us, and this right is absolute. You can do this by simply clicking on the unsubscribe link in any email you receive from us or alternatively getting in touch with us.

Object to our legitimate interests	Where we process your personal data to achieve a legitimate business interest of ours, for example those described under Section 4, you have the right to challenge this. If you do so, we will either confirm to you that the processing has stopped, or explain why we believe our interest in the relevant activity outweighs your interest.
Object to automated decision-making	You have the right to object to decisions made about you using your personal data and undertaken by purely automated means. If you do so, we will arrange for someone to assess the automated decision and confirm the outcome of this assessment to you.

Should you submit a request or complaint to us and remain unhappy with our response, you may raise a complaint directly with the supervisory authority who can be contacted by emailing commissioner@dp.difc.ae