### **Privacy Statement**

### **Our Privacy Statement**

Catalina UK is committed to protecting the privacy of your personal information. This Privacy Statement to lets you know how Catalina UK uses your personal data. In this statement you will find information about the types of personal data we collect from you, when we collect your personal data and how long we keep it for, how your personal data is collected, the reasons for collecting and using your personal data, and information about how your personal data is shared. The use of "we", "us", or "our" in this Privacy Statement, means Catalina UK or its subsidiaries (Catalina Worthing Insurance Limited (CWIL) and Catalina Services UK Limited (CSUK), collectively "Catalina UK").

Please take a moment to review this Privacy Statement in detail to understand the views and practices regarding your personal data and how is treated.

Any changes to this Privacy Statement will be communicated on <u>catalinaworthing.co.uk/GDPR.html</u> and, unless stated otherwise, will take effect immediately once posted.

You can contact us using the following contact information:

Office for Data Protection Compliance Catalina Services UK, Second Floor, Units B-C Downlands Business Park Worthing BN14 9RX United Kingdom

E: dataprotection@catalinare.com

# WHAT PERSONAL DATA DO YOU COLLECT FROM ME AND USE?

We shall process your personal data to provide you with the insurance coverage related to the insurance policy you are benefitting from. The types of personal data we collect about you depends on your relationship with Catalina UK.

- If you are a claimant making a claim under a Catalina UK policy, we
  may need to collect your contact information, as well as data about your
  claim and previous claims. We may also need to collect special category
  personal data, such as data about your medical and criminal history
  depending on the nature of your claim.
- If you are a business partner (i.e. a company or consultant providing services to Catalina UK), we will collect your business contact details.

We process personal data you provide to us, which may include the following categories of information:

- Anti-fraud information
- Banking Information
- Claims/Policy Numbers
- Credit History and Credit Score
- Date and Place of Birth
- Gender
- Employment Information, including your position, title, management level, work location, division, department, and position level
- Family Information, including next-of-kin information
- Government identification numbers National Insurance, Social Security, Passport, Tax, Driver's License
- Marital Status
- Name, Address, Phone Number, Email
- Risk information

and the following categories of special category personal data:

- Criminal History
- Health Data / Medical History
- Racial or ethnic origin

Where we will process special category personal data about you, we shall apply safeguards in accordance with the applicable data protection legislation.

If you are an applicant or an employee of Catalina UK, the processing of your personal data and your privacy rights are covered in the HR Privacy Statement.

#### WHEN DO YOU COLLECT MY PERSONAL DATA?

If you are a <u>claimant</u>, we collect data about you when you notify us of a claim, or if the claim is made by someone with a close relationship to you or who otherwise has authority to make a claim on your behalf. We may also collect personal data about you from others who are involved in the claim, including lawyers, witnesses, experts (including medical), and adjusters. Finally, we may consult other public sources to validate the claim or protect against fraud or other financial crime.

**If you are a <u>business partner</u>**, we collect data about you when you or your company provides that data to us as part of the business relationship.

Where were already have a contractual relationship with you, a decision by you not to provide the requested personal data may cause delay in fulfilment of our contractual obligations or may result in our being unable to continue the relationship.

# WHAT ACTIVITIES DO YOU CARRY OUT USING MY PERSONAL DATA – "PROCESSING ACTIVITIES"?

We use your personal data to carry out the following Processing Activities:

#### If you are a claimant:

- Complying with legal or regulatory obligations
- Defending or prosecuting legal claims
- Investigating or prosecuting fraud
- To communicate with you
- Payments to/from individuals
- Managing and administering reinsurance claims

#### If you are a business partner:

Managing our business relationship with business partners

# WHY DO YOU CARRY OUT THESE PROCESSING ACTIVITIES USING MY PERSONAL DATA?

Some of the laws that apply to us require us to tell you the legal reason for using your personal data. We list these below:

- Performance of a contract we must use your personal data to perform a contract with you – for example, to perform your insurance policy with us
- Legal obligation we must use your personal data to comply with our legal or regulatory obligations – for example, in relation to carrying out background checks or reporting financial crime
- **Legitimate interests** as an insurance business, we have a legitimate interest in using your personal data to protect ourselves from fraud

It may be necessary for us to process some special category personal data in order to comply with legal or regulatory obligations or if we need to do so to seek confidential legal advice or establish or defend legal claims. We shall also use your special category personal data, where appropriate, on the following specific bases:

- **Insurance purpose** it is necessary for us to use your special category personal data for an insurance purpose
- **Legal claims** it is necessary for us to use your special category personal data to establish, exercise or defend legal claims
- Fraud prevention it is necessary for us to use your special category personal data to prevent fraud or a particular kind of fraud
- Preventing or detecting unlawful acts it is necessary for us to use your special category personal data to prevent or detect an unlawful act

In some instances, we may use your personal data, including special category personal data, on the basis of your express consent. Where we rely on your consent as a legal basis for processing your personal data, we shall expressly inform you that we are doing so at the time that we request your consent. You do not have to give your consent and you may withdraw your consent at any time. However, if you do not give your consent, or you withdraw your consent, this may affect our ability to provide you with the service. If you choose to withdraw your consent, we shall inform you of the consequences of withdrawal.

### DO YOU SHARE MY PERSONAL DATA WITH THIRD PARTIES?

To help us carry out our Processing Activities, we may need to share your personal data with entities within and outside of Catalina UK as follows:

### If you are a claimant:

- Adjusters and other claims experts
- Anti-fraud agencies
- Courts
- Credit reference agencies
- Law enforcement authorities (domestic or foreign)
- Legal counsel
- Outside legal counsel
- Ombudsmen, including Financial Services and Pensions Ombudsman Office (FSPO) and Financial Ombudsmen Service (FOS)
- Reinsurers
- Regulators, including the Financial Conduct Authority (FCA), Prudential Regulation Authority (PRA), or the Information Commissioners' Office (ICO)
- Service providers who supply back-office support
- Third-Party Administrators (TPA)
- Amongst other members of the Catalina Group of Companies

#### If you are a <u>business partner</u>:

- Back-office service providers
- Amongst other members of the Catalina Group of Companies

# TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE UK/ EEA.

We may transfer your personal data to other companies within our group and our suppliers in the United States and Bermuda. We do this for management purposes, reporting activities on company performance for regulatory or statutory

purposes, in the context of a business reorganisation or group restructuring exercise, and for system maintenance support and hosting of data.

Whenever it is necessary to transfer your personal data to other companies of the group, agents or contractors located outside of the UK/ EEA, we shall take appropriate steps to ensure that such transfer adequately protects your rights and interests.

We shall only transfer your personal data to countries recognised as providing an adequate level of legal protection, or where we are satisfied that protections are in place to properly protect your privacy rights.

Transfers between Catalina Group of companies are covered by intraorganisational agreements that provide specific requirements designed to ensure your personal data receives necessary protection whenever it is transferred within Catalina.

Transfers to our service providers and business partners are protected by contractual agreements approved by the European Commission or by the UK Information Commissioner's Office (ICO). Before transferring your data to our service providers, we ensure they can provide adequate level of data protection.

#### FOR HOW LONG DO YOU KEEP MY PERSONAL DATA?

We keep your personal data for no longer than is necessary for the purpose for which the information is collected and to manage our relationship with you. Where personal data is kept, that period will be determined based on applicable legal or regulatory requirements. For further information, please contact us as set out above.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) or receive anonymised personal data for research or statistical purposes, in which case we may use this information indefinitely without giving further notice to you.

#### DO YOU SECURELY STORE MY PERSONAL DATA?

We apply strict security standards, controls, and processes to protect your personal data from unauthorised access, loss, or accidental deletion. These include restricting who can have access to your personal data and protecting your data with security tools appropriate to the type of information e.g., encryption software.

We also require that our third-party processors who handle your personal data do the same.

### YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

We explain here the rights that you may have in relation to personal data if you live in the UK or European Union:

#### HOW CAN I FIND OUT WHAT PERSONAL DATA YOU HOLD ABOUT ME?

You may contact us using the contact information above if you would like more detailed information about what personal data we have collected from you, including the categories of personal data processed, the purposes of the processing and the third parties to whom that data is transferred. You may also request a copy of your data. Note that we do have to consider the interests of others, and certain other legal obligations or restrictions, so this is not an absolute right.

#### CAN I ASK YOU TO DELETE OR CORRECT MY PERSONAL DATA?

You may contact us using the contact information above if you would like us to delete your personal data or to have your personal data corrected and, if required to do so, we will comply with your request.

#### CAN I ASK YOU TO STOP USING MY PERSONAL DATA?

You may contact us using the contact information above if you would like us to stop using your personal data (either entirely or for some of our Processing Activities) and, if required to do so, we will comply with your request.

#### CAN I ASK YOU TO TRANSFER MY PERSONAL DATA TO A THIRD-PARTY?

You may contact us using the contact information above if you would like us to transfer your personal data to a third-party in a structured, commonly used and machine-readable format and, if required to do so, we will comply with your request.

### DO YOU CARRY OUT AUTOMATED DECISION MAKING?

We do not make any decision about you which has a legal or similarly significant effect on you based solely on automated processing (i.e. without human intervention).

#### DO YOU USE COOKIES?

Cookies are text files containing small amounts of information which are downloaded to your computer or mobile device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that Cookie. Cookies are useful because they allow a website to recognise a user's device. Cookies allow you to navigate between pages efficiently, remembering your preferences and generally improving the user experience.

Our [Cookies Notice – Link] provides you with more information about our use of Cookies.

# WHAT SHOULD I DO IF I AM NOT HAPPY WITH HOW MY INFORMATION IS BEING USED?

If you have any concerns about our use of your personal data, you can make a complaint to us at <a href="mailto:dataprotection@catalinare.com">dataprotection@catalinare.com</a>.

You also have the right to complain to our relevant Supervisory Authority, which is the Information Commissioner's Officer (ICO) in the UK, who is responsible for ensuring we correctly follow the law or to any other competent data protection Supervisory Authority. You can contact the ICO at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113

Contact details of other data protection Supervisory Authorities can be found here: <a href="http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\_id=612080">http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\_id=612080</a>