

Liberty Specialty Markets takes the protection of your personal data seriously and is committed to protecting your privacy.

This Privacy Notice sets out details of the information that we may collect from you and how we may use that information. Please take your time to read this notice carefully. When using a Liberty Specialty Markets website, this notice should be read alongside the website terms and conditions.

## 1. About Liberty Specialty Markets

Liberty Specialty Markets is an international insurance business. We offer insurance to individuals, companies and other insurers.

In order for us to deliver insurance services which involve providing you with a quote and then insurance, and dealing with any claims or complaints that might arise, we need to collect and process data. We also collect your information for recruitment purposes, in our contractual relationships with you and for relationship development, where appropriate. This makes us a "data controller".

Liberty Specialty Markets is comprised of a number of data controllers depending on the interaction you have with us or the policy written.

- If you are contacting us for recruitment purposes then Liberty Specialty Markets Limited and/or Liberty Specialty Markets Europe Sarl will be the data controllers for your personal data.
- If you are a broker, customer, supplier, contractual counterparty or other third party then one of the following will be the data controllers of your personal data:
  - Liberty Managing Agency Limited (for and on behalf of the Underwriting Members of Lloyd's Syndicate 4472) and/or
  - Liberty Mutual Insurance Europe SE and/or
  - Liberty Specialty Markets Europe S.a.r.L and/or
  - Liberty Specialty Markets Europe Two S.a.r.L and/or
  - Liberty Mutual Reinsurance (a division of Liberty Mutual Insurance Company) and/or
  - Liberty Specialty Markets MENA Limited and/or
  - Liberty Specialty Markets Bermuda Limited and/or
  - Liberty Specialty Markets Agency Limited.

Any documentation you receive may state any of our trading names, including Liberty Specialty Markets, Liberty Mutual Reinsurance, Global Transaction Solutions or Liberty Mutual Surety. The specific company acting as a data controller of your personal data will be listed in the in the documentation, we provide to you.

If you are a customer residing in California, please view the relevant supplementary privacy notice [here](#).

If you are unsure about who the data controller of your personal data is, you can also contact us at any time by e-mailing us at [dataprotectionofficer@libertyglobalgroup.com](mailto:dataprotectionofficer@libertyglobalgroup.com) or by writing to Data Protection Officer, Liberty Specialty Markets, 20 Fenchurch Street, London, EC3M 3AW.

## 2. About the insurance market

Insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, insurers, and reinsurers. [The London Insurance Market Core Uses Information Notice](#) sets out those core necessary personal data uses and disclosures. Our core uses and disclosures are consistent with the London Market Core Uses Information Notice. We recommend you review this notice (by clicking the link above).

### 3. Our processing of your personal and special category data

The types of personal data that we collect and our uses of that personal data will depend on our relationship with you. For example, we will collect different personal data depending on whether you are a policyholder, a beneficiary under an insurance policy, a claimant, a witness, a broker, a potential employee or another third party.

Sometimes we will request or receive your “sensitive personal data” (which is information relating to your health, genetic or biometric data, criminal convictions, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership). For example we may need access to information about your health in order to provide you with a quote, provide your insurance policy, or process any claims you make. We may also need details of any unspent criminal convictions you have for fraud prevention purposes.

This notice sets out the legal grounds enabling us to process your personal and special category data. There are different requirements in different jurisdictions for processing special category data. For example, in England, we are able to process special category data where it is necessary to provide insurance services to you. In other jurisdictions, we require your explicit consent. Where the tables below note that special category data will be processed for the purposes of providing insurance, this only applies to our data controllers subject to English, Irish, Dutch or Spanish law (this will be clear from the documentation supplied to you).

Where the provision of information is legally or contractually required, we will tell you this at the time of collection.

Where you provide personal data to us about other individuals (for example, members of your family) we will also be data controller of and responsible for their personal data. You should refer them to this notice before supplying us data on behalf of others.

We may amend the personal data so that you cannot be identified from the data either by itself or when combined with any other data we hold. That data will then not be subject to this notice or data protection law.

In order to make this notice as user friendly as possible, we have split it into different sections. The notice is available in different languages to reflect our global presence.

#### 3.1. Prospective policyholders or beneficiaries

If you apply for an insurance policy or where someone else (such as a family member or your employer) applies for an insurance policy which will benefit you, this section will be relevant to you and sets out our uses of your personal data.

#### What personal data will we collect?

- General information such as your name, address, contact phone numbers and email addresses, date of birth and gender.
- Information about your relationship to the policyholder where you are the beneficiary.
- Identification information such as passport details, driving licence and national insurance number.
- Your bank and payment details.
- If relevant, information about your job such as job title, employment history and professional accreditations.
- Any financial information about you which we have obtained as a result of conducting credit checks such as bankruptcy orders, individual voluntary arrangements or country court judgments.
- Information which we obtain as part of checking sanctions lists, such as those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security .
- Any information which is relevant to your insurance application such as previous insurance policies you have held and claims you have made. This will also include any information specific to the type of policy you are applying for, for example, if you are applying for a fine art policy we may collect and use information which relates to your art collection.
- Information which we have gathered from publicly available sources such as the electoral roll, newspapers and social media sites.
- Any other information passed on from you, your insurance broker or someone else applying on your behalf.

### What sensitive personal data will we collect?

- Details about your criminal convictions and any related information. This will include information relating to any offences or alleged offences you have committed or any court sentences which you are subject to.
- Details about your physical and mental health which are relevant to your application (e.g. if you take out or are covered by a personal accident policy, we may need details of pre-existing medical conditions). This may take the form of medical reports or underlying medical data such as x-rays or blood tests.
- We may also collect information because it is relevant to your application, which reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs; political opinions; trade union membership; genetic or biometric data; or data concerning your sex life or sexual orientation. For example, we may process information relating to your trade union membership if you take out a policy with us via your trade union body, as we can determine that you are a member of a trade union or where you specify certain medical treatments, this could indicate your religious beliefs.

### How will we collect your personal data?

Your personal data may only be collected in cases permitted by law.

We will collect information directly from you:

- When you apply for or renew a policy.
- When we are providing you with a quotation.
- When you contact us by email, telephone and through other written and verbal communications.
- When you contact our third-party administrators by telephone (please note that call recording may be used).

As well as obtaining information directly from you, we will collect information from:

- The applicant where you are a beneficiary or named under an insurance policy;
- Third parties involved in the insurance application process (such as our business partners and representatives, brokers or other insurers).
- Publicly available sources such as the electoral roll, court judgments, insolvency registers, internet search engines, news articles and social media sites.
- Other Liberty Mutual Insurance Group companies.
- Credit reference agencies in relevant jurisdictions e.g. CallCredit, Equifax and Experian are the credit reference agencies in the UK
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).

### What will we use your personal data for?

We may use your personal data for a number of different purposes. In each case, we must have a "legal ground" to do so. We will rely on the following "legal grounds", when we process your "personal data":

- We need to use your personal data to enter into or perform the insurance contract that we hold with you. For example, we need to use your personal data to provide you with a quote.
- We have a legal or regulatory obligation to use such personal data. For example, our regulators require us to hold certain records of our dealings with you.
- We need to use your personal data for a legitimate interest (e.g. to keep a record of the decisions we make when different types of applications are made, to keep business records, to carry out strategic business analysis, review our business planning and to develop and improve our products and services). When using your personal data for these purposes, we will always consider your rights and interests.

When the information that we process is classed as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when we process your "sensitive personal data":

- We need to use sensitive personal data in order to establish, exercise or defend our rights. This situation may arise when we are the subject of legal proceedings or wish to initiate proceedings ourselves, or in investigating a third party's claim against you.

- We need to use sensitive personal data for purposes of public interest justified by the fulfillment of a legal obligation, in accordance with the authorizations and standards of the CNIL.
- You have given your consent to the use of your sensitive personal data (e.g. in connection with your complaint), unless the law provides that the collection and processing of sensitive personal data is prohibited despite your consent. In certain circumstances, your consent is required for the processing of sensitive personal data (for example, information about your state of health). Without your consent, we may not be able to offer you an insurance policy. We will always tell you why your consent is required.
- Sensitive personal data have been made public by you.

Purpose for processing	Legal grounds for using your personal data	Legal grounds for using your sensitive personal data
<b>To evaluate prospective clients, including carrying out fraud, credit and anti-money laundering checks.</b>	<ul style="list-style-type: none"> <li>• It is necessary to enter your insurance contract.</li> <li>• We have a legitimate interest (to assess the insurance application).</li> </ul>	<ul style="list-style-type: none"> <li>• It is in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud).</li> <li>• Such use is necessary for insurance purposes.</li> <li>• We need to establish, exercise or defend legal rights.</li> <li>• You have given us your explicit consent.</li> </ul>
<b>To manage and handle your insurance application and queries.</b>	<ul style="list-style-type: none"> <li>• It is necessary to enter or perform your insurance contract.</li> <li>• We have a legitimate interest (to assess the insurance application).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent. We will need your consent before we can provide your policy.</li> <li>• Such use is necessary for insurance purposes.</li> </ul>
<b>To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers, or carrying out customer satisfaction surveys).</b>	We have a legitimate interest (to develop and improve the products and services we offer).	You have given us your explicit consent.
<b>To comply with our legal or regulatory obligations.</b>	We need to use your information in order to comply with our legal obligations.	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>
<b>For business and management processes and activities including analysis, review, planning, business transaction and IT hosting, support and security.</b>	We have a legitimate interest (to effectively manage our business).	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• We need to use your information to establish, exercise or defend legal rights.</li> <li>• Such use is necessary in the substantial public interest.</li> </ul>
<b>For insurance administration purposes including analysis of trends, carrying out actuarial work, planning service delivery, risk assessment and costs and charges.</b>	We have a legitimate interest (to develop and improve the products and services we offer).our contract with you.	You have given us your explicit consent.

## Who will we share your personal data with?

We will keep your personal data confidential, and we will only share it where necessary for the purposes set out above with the following parties:

- Other companies of the Liberty Mutual Insurance Group (inside or outside the European Union, as specified in section 6 of this Data Protection Sheet: "What is our policy on the transfer of personal data outside the European Union"), as well as their service providers.
- Third parties involved in the administration of your insurance application. These include surveyors, valuers and other experts.
- Other insurers (e.g. where another insurer has previously provided you with a policy or handled a claim).
- Insurance brokers and other intermediaries.
- Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance.
- Credit reference agencies in relevant jurisdictions
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime detection agencies and insurance industry databases.
- Our regulators including the Swiss Financial Market Supervisory Authority FINMA.
- The police, HMRC and other crime prevention and detection agencies.
- Third party suppliers, agents and contractors appointed by Liberty Specialty Markets or the Liberty Mutual Group to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Any agent or representative acting for you.
- Any other person where necessary to perform any insurance contract with you, in order to protect ourselves from risk or to ensure regulatory compliance or good governance.

## 3.2. Policyholder or beneficiary under an insurance policy

If you take out an insurance policy with us (e.g. a fine art policy) or if you are listed as an applicant or beneficiary under a policy that someone else has with us (such as a named director under a Directors & Officers policy), this section will be relevant to you and sets out our uses of your personal data.

### What personal data will we collect?

- General information such as your name, address, contact phone numbers and email addresses, date of birth and gender.
- Information about your relationship to the policyholder where you are the beneficiary.
- Identification information such as passport details, driving licence and national insurance number.
- Your bank and payment details (account numbers, IBAN, BIC, postal bank).
- If relevant, information about your job such as job title, employment history and professional accreditations.
- Data of a financial nature, such as income from work and other income, securities, real estate assets, outstandings, and information relating to indebtedness, securities held, securities account statements, tax data, credits, taxable income, cheque and bank card numbers, the date on which the bank card expires, general and administrative expenses, subscribed and reimbursed capital, overindebtedness or and the right to insurance benefits (CMU beneficiaries, RS).
- Information which we obtain as part of checking sanctions lists, such as those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security .
- Any information which is relevant to your insurance application such as previous insurance policies you have held and claims you have made. This will also include any information specific to the type of policy you are applying for, for example, if you hold a property protection policy, we will collect and use information about your property or if you hold a fine art policy, we will collect and use information about your fine art or jewellery collection.
- Information (including photographic evidence) which is relevant to your policy or claim. For example, if you make a claim following damage to your property, we may use information relating to your property or if you

make a claim following a road traffic accident, we may use personal data relating to your vehicle and named drivers.

- Information which we have gathered from publically available sources such as the electoral roll, newspapers and social media sites.
- Any other information passed on from you, your insurance broker or someone else applying on your behalf.

#### **What sensitive personal data will we collect?**

- Details about your criminal convictions and any related information. This will include information relating to any offences or alleged offences you have committed or any court sentences which you are subject to.
- Details about your physical and mental health which are relevant to your policy or claim (e.g. if you are a pilot and take out or are covered by an aviation policy, we may need details of pre-existing medical conditions). This may take the form of medical reports or underlying medical data such as x-rays or blood tests.
- We may also collect information because it is relevant to your policy or claim, which reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs; political opinions; trade union membership; genetic or biometric data; or data concerning your sex life or sexual orientation. For example, we may process information relating to your trade union membership if you take out a policy with us via your trade union body, as we can determine that you are a member of a trade union or where you specify certain medical treatments, this could indicate your religious beliefs.

#### **How will we collect your personal data?**

We collect your personal data only in the cases permitted by law.

We will collect information directly from you:

- when you apply for or renew a policy;
- when we are providing you with a quotation;
- when you make a claim on your policy;
- when you contact us by email, telephone and through other written and verbal communications;
- when you contact our third party administrators by telephone (please note that call recording may be used).
- when you make a complaint.

As well as obtaining information directly from you, we will collect information from:

- The named policyholder where you are a beneficiary.
- Third parties involved in the relevant insurance policy or claim (such as our business partners and representatives, brokers or other insurers, claimants, defendants or witnesses to an incident).
- Third parties who provide a service in relation to the relevant insurance policy or claim (such as loss adjusters, claims handlers, and medical experts).
- Publically available sources such as the electoral roll, court judgments, insolvency registers, internet search engines, news articles and social media sites.
- Other Liberty Mutual Insurance Group companies.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime detection agencies and insurance industry databases (e.g. for the fight against fraud and the verification of international sanctions).
- Our regulators including the Swiss Financial Market Supervisory Authority FINMA.
- The police, tax authorities and other crime prevention and detection agencies.
- Third party suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer or disposal of our business.

#### **What will we use your personal data for?**

We may use your personal data for a number of different purposes. In each case, we must have a "legal ground" to do so. We will rely on the following "legal grounds", when we process your "personal data":



- We need to use your personal data to enter into or perform the insurance contract that we hold with you. For example, we need to use your personal data to provide you with a quote or to provide your insurance policy and other associated products (e.g. legal expenses cover). We will rely on this for activities such as assessing your application, managing your insurance policy, handling claims and providing other products to you.
- We have a legal or regulatory obligation to use such personal data. For example, our regulators require us to hold certain records of our dealings with you.
- We need to use your personal data for a legitimate interest (e.g. to properly investigate incidents which are the subject of a claim, to keep business records, to carry out strategic business analysis, review our business planning and to develop and improve our products and services). When using your personal data for these purposes, we will always consider your rights and interests.

When the information that we process is classed as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when we process your "sensitive personal data":

- We need to use sensitive personal data in order to establish, exercise or defend our rights. This situation may arise when we are the subject of legal proceedings, or wish to take legal proceedings ourselves, or in investigating a third party's claim against you.
- We need to use such special category data for a justifiable public interest purpose on the basis of a legal requirement (e.g. security scanning of email contents to detect cyber threats)
- You have given your consent to the use of your sensitive personal data (e.g. in connection with your complaint), unless the law provides that the collection and processing of sensitive personal data is prohibited despite your consent. In certain circumstances, your consent is required for the processing of sensitive personal data (for example, information about your state of health). Without your consent, we may not be able to enter into an insurance contract or handle claims. We will always explain why your consent is required.
- Sensitive personal data have been made public by you.

Purpose for processing	Legal grounds for using your personal data	Legal grounds for using your sensitive personal data
<b>To evaluate clients, including carrying out fraud, credit and anti-money laundering checks on you.</b>	<ul style="list-style-type: none"> <li>• It is necessary to enter into your insurance contract.</li> <li>• We have a legitimate interest (to prevent fraud and other financial crime).</li> </ul>	<ul style="list-style-type: none"> <li>• It is in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud).</li> <li>• Such use is necessary for insurance purposes.</li> <li>• We need to establish, exercise or defend legal rights.</li> <li>• You have given us your explicit consent.</li> </ul>
<b>To manage and handle your insurance application and queries.</b>	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract.</li> <li>• We have a legitimate interest (to assess the insurance application and manage the application process).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent. In some circumstances, we will need your consent before we can provide your policy.</li> </ul>
<b>To manage any claims you make under your insurance policy.</b>	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract</li> <li>• We have a legitimate interest (to assess and pay your claim and manage the claims process).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent. In some circumstances, we will need your consent before we can pay your claim.</li> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> <li>• Such use is necessary for insurance purposes.</li> </ul>

<b>To prevent and investigate fraud.</b>	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract.</li> <li>• We have a legitimate interest (to prevent and detect fraud and other financial crime).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>
<b>To communicate with you and resolve any complaints that you might have.</b>	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract.</li> <li>• We have a legitimate interest (to send you communications, record and investigate complaints and ensure that future complaints are handled appropriately).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>
<b>To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers, or carrying out customer satisfaction surveys).</b>	We have a legitimate interest (to develop and improve the products and services we offer).	You have given us your explicit consent.
<b>For business and management processes and activities including analysis, review, planning, business transaction and IT hosting, support and security.</b>	<ul style="list-style-type: none"> <li>• We have a legitimate interest (to effectively manage our business).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• Such use is necessary in the substantial public interest</li> </ul>
<b>For insurance administration purposes including analysis of trends, carrying out actuarial work, planning service delivery, risk assessment and costs and charges.</b>	We have a legitimate interest (to develop and improve the products and services we offer).	You have given us your explicit consent.
<b>To apply for and claim on our insurance.</b>	We have a legitimate interest (to ensure that we have appropriate insurance in place).	<ul style="list-style-type: none"> <li>• You have given us your explicit consent</li> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>

### Who will we share your personal data with?

We will keep your personal data confidential, and we will only share it where necessary for the purposes set out above with the following parties.

- Other Liberty Mutual Group companies and their service providers (inside or outside the European Union, as specified in section 6 of this Data Protection Sheet: "What is our policy on the transfer of personal data outside the European Union").
- Third parties involved in the administration of the relevant insurance policy or claim. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts including medical experts.
- Other insurers (e.g. where another insurer has previously provided you with a policy or handled a claim).
- Insurance brokers and other intermediaries.
- Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance.



- Credit reference agencies in relevant jurisdictions.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime detection agencies and insurance industry databases.
- Our regulators including the Swiss Financial Market Supervisory Authority FINMA.
- The police, the tax authorities and other crime prevention and detection agencies.
- Third-party service providers, agents and contractors appointed by Liberty Specialty Markets or the Liberty Mutual Group to assist us in our day-to-day business, including IT service providers, actuaries, auditors, lawyers, document management service providers, external business management service providers, our subcontractors and tax consultants.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Any agent or representative acting for you.
- Any other person where necessary to perform any insurance contract with you, in order to protect ourselves from risk or to ensure regulatory compliance or good governance.

### 3.3. Third party claimant

Your situation falls within the scope of this section which describes the use of your personal data, if you are the author of a claim against a third party insured with our company.

#### What personal data will we collect?

- General information such as your name, address, contact phone numbers and email addresses, date of birth and gender.
- Identification information such as passport details, driving licence and national insurance number.
- Your bank and payment details (account numbers, IBAN, BIC, postal bank).
- Other financial data such as income salary information.
- If relevant to your claim, we may collect information about your job such as job title, employment history and professional accreditations. We may also collect telematic data such as information about your driving habits.
- Information which we obtain as part of checking sanctions lists, such as those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security .
- Information relating to previous insurance policies you have held and claims you have made.
- Information (including photographic evidence) which is relevant to your claim. For example, if you make a claim following damage to your property, we may use information relating to your property or if you make a claim following a road traffic accident, we may use personal data relating to your vehicle and named drivers.
- Information which we have gathered from publically available sources such as the electoral roll, newspapers and social media sites.
- Any other information passed on from you, your representative or someone else making the claim on your behalf.

#### What sensitive personal data will we collect?

- Details about your criminal convictions and any related information. This will include information relating to any offences or alleged offences you have committed or any court sentences which you are subject to.
- Details about your physical and mental health which are relevant to your claim (e.g. because you have been injured whilst at a property insured by us). This may take the form of medical reports or underlying medical data such as x-rays or blood tests.
- We may also collect information because it is relevant to your claim, which reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs; political opinions; trade union membership; genetic or biometric data; or data concerning your sex life or sexual orientation.

#### How will we collect your personal data?

Your personal data will only be collected in cases permitted by law.

We will collect information directly from you:

- when you make a claim;

- when you contact us by email, telephone and through other written and verbal communications;
- when you contact our third party administrators by telephone (please note that call recording may be used).
- when you make a complaint.

As well as obtaining information directly from you, we will collect information from:

- The party who holds a policy with us.
- Third parties involved in the insurance policy or claim (such as our business partners and representatives, brokers or other insurers, claimants, defendants or witnesses to an incident).
- Third parties who provide a service in relation to the claim (such as loss adjusters, claims handlers, and experts).
- Publicly available sources such as the electoral roll, court judgements, insolvency registers, internet search engines, news articles, litigation information and social media sites.
- Other Liberty Mutual Insurance Group companies.
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).
- In limited circumstances, private investigators.

### What will we use your personal data for?

We may use your personal data for a number of different purposes. In each case, we must have a "legal ground" to do so. We will rely on the following "legal grounds" when we process your "personal data":

- We have a legal or regulatory obligation to use such personal data. For example, our regulators require us to hold certain records of our dealings with you.
- We need to use your personal data for a legitimate interest (e.g. to properly investigate incidents which are the subject of a claim, to keep business records, to carry out strategic business analysis, review our business planning and to develop and improve our products and services). When using your personal data for these purposes, we will always consider your rights and interests.

When the information that we process is classed as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when we process your "sensitive personal data":

- We need to use such sensitive personal data to establish, exercise or defend legal rights. This might happen when we are faced with legal proceedings or want to bring legal proceedings ourselves or we are considering the claim that has been made against our policyholder.
- We need to use sensitive personal data for public interest purposes justified by the fulfilment of a legal obligation (for example, security scanning of email content to detect cyber threats), and in accordance with the authorizations and standards issued by the CNIL.
- You have provided your consent to our use of your personal data. In some circumstances, we may need your consent to process sensitive personal data (e.g. health information). Without it, we may be unable to handle your claims. We will always explain why your consent is necessary.
- Sensitive personal data have been made public by you.

### Purpose for processing

### Legal grounds for using your personal data

### Legal grounds for using your sensitive personal data

#### To manage claims.

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| <ul style="list-style-type: none"> <li>• We have a legitimate interest (to assess and pay your claim and manage the claims process).</li> <li>• We need to use your information in order to comply with our legal obligations.</li> </ul> | <ul style="list-style-type: none"> <li>• You have given us your explicit consent. In some cases, we will need your consent before we can pay your claim.</li> <li>• We need to use your information in order to establish, exercise or defend legal rights</li> <li>• Such use is necessary for insurance purposes.</li> </ul> |
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<b>To prevent and investigate fraud.</b>	We have a legitimate interest (to prevent and detect fraud and other financial crime).	<ul style="list-style-type: none"> <li>You have given us your explicit consent. In some cases, we will need your consent before we can pay your claim.</li> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>
<b>To comply with our legal or regulatory obligations.</b>	We need to use your information in order to comply with our legal obligations.	<ul style="list-style-type: none"> <li>You have given us your explicit consent.</li> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>
<b>To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers, or carrying out customer satisfaction surveys).</b>	We have a legitimate interest (to develop and improve the products and services we offer).	You have given us your explicit consent.
<b>For business and management processes and activities including analysis, review, planning, business transaction and IT hosting, support and security.</b>	We have a legitimate interest (to effectively manage our business).	<ul style="list-style-type: none"> <li>You have given us your explicit consent.</li> <li>Such use is necessary in the substantial public interest.</li> </ul>
<b>For insurance administration purposes including analysis of trends, carrying out actuarial work, planning service delivery, risk assessment and costs and charges.</b>	We have a legitimate interest (to effectively manage our business).	You have given us your explicit consent.
<b>To apply for and claim on our own insurance.</b>	We have a legitimate interest (to ensure that we have appropriate insurance in place).	<ul style="list-style-type: none"> <li>You have given us your explicit consent.</li> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>

### Who will we share your personal data with?

We will keep your personal data confidential, and we will only share it where necessary for the purposes set out above with the following parties.

- Other Liberty Mutual Group companies and their service providers (both inside and outside the European Economic Area or Switzerland as specified in section 6 of this Data Protection Sheet: "What is our policy on the transfer of personal data outside the European Union").
- Third parties involved in the administration of your claim such as loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts including medical experts.
- Other insurers (e.g. where another insurer is also involved in a claim that you are making).
- Our insured policyholder.
- Insurance brokers and other intermediaries.
- Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance.
- Insurance industry bodies.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime detection agencies and insurance industry databases.
- Our regulators including the Swiss Financial Market Supervisory Authority FINMA.

- The police, other tax authorities and other crime prevention and detection agencies.
- Third party suppliers, agents and contractors appointed by Liberty Specialty Markets and the Liberty Mutual Group to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Any agent or representative acting for you.
- Any other person where necessary to perform any insurance contract with you, in order to protect ourselves from risk or to ensure regulatory compliance or good governance.

### 3.4. Witnesses to an incident

If you are a witness to an incident which is the subject of a claim, this section will be relevant to you and sets out our uses of your personal data.

#### What personal data will we collect?

Under the conditions provided for by standards NS 16 and NS 56 and the authorization AU 39 adopted by the CNIL, this personal data includes:

- General information such as your name, address, contact phone numbers and email addresses, date of birth and gender.
- Information relevant to the incident that you have witnessed.

#### What sensitive personal data will we collect?

Sensitive personal data of witnesses of an accident are collected only in exceptional cases. However, if you are involved in the accident and your data is brought to our attention (for example, through a medical report), we may need to process your sensitive personal data.

#### How will we collect your information?

We collect your personal data only in the cases permitted by law.

As well as obtaining information directly from you, we will collect information from:

- Third parties involved in the incident you witnessed (such as brokers or other insurers, claimants, defendants or other witnesses).
- Other third parties who provide a service in relation to the claim which relates to the incident you witnessed (such as loss adjusters, claims handlers, and experts).
- Publicly available sources such as the electoral roll, court judgments, insolvency registers, insurance industry databases, internet search engines, news articles and social media sites.
- Other companies within the Liberty Mutual Insurance Group.

#### What will we use your personal data for?

We may use your personal data for a number of different purposes. In each case, we must have a "legal ground" to do so. We will rely on the following "legal grounds", when we process your "personal data":

- We have a legal or regulatory obligation to use such personal data. For example, our regulators require us to hold certain records of our dealings with you.
- We need to use your personal data for a legitimate interest (e.g. to properly investigate incidents which are the subject of a claim, to keep business records, to carry out strategic business analysis, review our business planning and to develop and improve our products and services). When using your personal data for these purposes, we will always consider your rights and interests.

When the information that we process is classed as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when we process your "sensitive personal data":

- We need to use such sensitive personal data to establish, exercise or defend legal rights. This might happen when we are faced with legal proceedings or want to bring legal proceedings ourselves.
- We need to use sensitive personal data for justifiable public interest purposes on the basis of a legal obligation and in accordance with the authorisations and standards issued by the CNIL.
- You have given your consent to the use of your sensitive personal data, unless the law provides that the collection and processing of sensitive personal data is prohibited despite your consent.
- Sensitive personal data have been made public by you

Purpose for processing	Legal grounds for using your personal data	Legal grounds for using your sensitive personal data
<b>To investigate and manage claims made under an insurance policy.</b>	We have a legitimate interest (to assess and pay claims and manage the claims process).	<ul style="list-style-type: none"> <li>• You have given us your explicit consent. In some cases, we will need your consent before we can pay your claim.</li> <li>• We need to use your information in order to establish, exercise or defend legal rights</li> <li>• Such use is necessary for insurance purposes.</li> </ul>
<b>For business and management processes and activities including analysis, review, planning, business transaction and IT hosting, support and security.</b>	We have a legitimate interest (to effectively manage our business).	<ul style="list-style-type: none"> <li>• You have given us your explicit consent. In some cases, we will need your consent before we can pay your claim.</li> <li>• Such use is necessary in the substantial public interest.</li> </ul>
<b>To comply with our legal or regulatory obligations.</b>	We need to use your information in order to comply with our legal obligations.	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>
<b>To prevent and investigate fraud.</b>	We have a legitimate interest (to prevent and detect fraud and other financial crime).	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> <li>• Such use is necessary for insurance purposes.</li> </ul>

### Who will we share your personal data with?

We will keep your personal data confidential and we will only share it where necessary for the purposes set out above with the following parties:

- Other Liberty Group companies.
- Third parties involved in the administration of an insurance policy or claim. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts including medical experts.
- Other insurers (e.g. where another insurer is also involved in the claim which relates to the incident you witnessed).
- Insurance brokers and other intermediaries.
- Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance.
- Insurance industry bodies.
- Financial crime detection agencies and insurance industry databases.
- Our regulators including the Swiss Financial Market Supervisory Authority FINMA.

- The police, other tax authorities and other crime prevention and detection agencies.
- Third party suppliers, agents and contractors appointed by Liberty Specialty Markets or the Liberty Mutual Group to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Any agent or representative acting for you.
- Any other person where necessary to perform any insurance contract with you, in order to protect ourselves from risk or to ensure regulatory compliance or good governance.

### **3.5. Brokers, appointed representatives, suppliers and other business partners**

Your situation falls within the scope of this section which describes the use of your personal data, if you are a broker with a business relationship with our Company, a designated representative or other business partner, such as a promoter or service provider.

#### **What personal data will we collect?**

- Under the conditions provided for by standards NS 16 and NS 56 and the authorization AU 39 adopted by the CNIL, this personal data includes:
- General information such as your name, address, contact phone numbers and email addresses, date of birth and gender, language spoken.
- Identification information such as passport details, driving licence and national insurance number.
- Information about your job such as job title and previous roles.
- Log in information, IP address if you are directly accessing any of our systems.
- Information which we obtain as part of checking sanctions lists, such as those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.
- Other information (including publicly available information) obtained as part of our due diligence checks.
- If you attend an event with us, we may collect relevant details such as your event preferences and dietary requirements.
- If you attend an event with us, we may collect relevant details such as your event preferences and dietary requirements.

#### **What sensitive personal data will we collect?**

- Data relating to offences, convictions and security measures, either at the time of subscription of the insurance contract, or during its execution, or for the management of disputes.
- If you participate in one of our events, data relating to your food preferences which, by their collection or processing, are likely to reveal, directly or indirectly:
  - Information on your state of health.
  - Information on your religious beliefs.
- In the event of an emergency, we may need to collect sensitive data about you such as health information.

#### **How will we collect your information?**

Your personal data will only be collected in cases permitted by law.

As well as obtaining information directly from you, we will collect information from:

- Invoices, contracts, policies, correspondence and business cards
- Other Liberty Mutual Insurance Group companies.
- Publicly available sources such as internet search engines.
- From service providers who carry out sanctions checks.

#### **What will we use your personal data for?**

We may use your personal data for a number of different purposes. In each case, we must have a "legal ground" to do so. We will rely on the following "legal grounds", when we process your "personal data":



- We need to use your personal data to enter into or perform the contract that we hold with you. For example, we may need certain information in order to operate our business partnership arrangement.
- We have a legal or regulatory obligation to use such personal data. For example, we may be required to carry out certain background checks.
- We need to use your personal data for a legitimate interest (e.g. to keep business records, to carry out strategic business analysis, review our business planning and to develop and improve our products and services). The use of such data shall be limited to what is strictly necessary for the purpose in question and subject to the applicable data retention periods. Furthermore, we take due account of your rights and interests in the use of your personal data for these purposes.

When the information that we process is classed as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when we process your "sensitive personal data":

- We need to use your sensitive personal data to establish, exercise or defend legal rights. This might happen when we are faced with legal proceedings or want to bring legal proceedings ourselves.
- We need to use such special category data for a justifiable public interest purpose on the basis of a legal requirement (e.g. security scanning of email contents to detect cyber threats)
- You have given your consent to the use of your sensitive personal data, unless the law provides that the collection and processing of sensitive personal data is prohibited despite your consent.
- Sensitive personal data have been made public by you.
- We need to use your sensitive personal data in an emergency in order to prevent e.g. serious physical harm to you

Purpose for processing	Legal grounds for using your personal data	Legal grounds for using your sensitive personal data
<b>For business and management processes and activities including analysis, review, planning, business transactions and IT hosting, support and security.</b>	We have a legitimate interest (to effectively manage our business).	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• Such use is necessary in the substantial public interest.</li> </ul>
<b>To comply with our legal or regulatory obligations.</b>	We need to use your information in order to comply with our legal obligations.	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>
<b>To write business and for claims handling.</b>	We have a legitimate interest (to effectively write policies and manage claims).	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• We need to use your information in order to establish, exercise or defend legal rights</li> <li>• Such use is necessary for insurance purposes.</li> </ul>
<b>For business development and relationship purposes.</b>	We have a legitimate interest (relationship management and business analysis).	You have given us your explicit consent.
<b>Providing improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers).</b>	We have a legitimate interest (to develop and improve the products and services we offer).	You have given us your explicit consent.
<b>To manage and handle your queries.</b>	<ul style="list-style-type: none"> <li>• We have a legitimate interest (to effectively</li> </ul>	You have given us your explicit consent.

manage our business and respond to queries).

- It is necessary to enter into or perform our contract with you.

**For insurance administration purposes including analysis of trends, carrying out actuarial work, planning service delivery, risk assessment and costs and charges.**

We have a legitimate interest (to develop and improve the products and services we offer).

- You have given us your explicit consent.
- We need to use your information in order to establish, exercise or defend legal rights
- Such use is necessary for insurance purposes.

**To provide protection in case of emergency.**

The processing is necessary in order to protect your vital interests or those of another person.

The processing is necessary in order to protect your vital interests or those of another person.

### Who will we share your personal data with?

We will keep your personal data confidential and we will only share it where necessary for the purposes set out above with the following parties:

- Our policyholders and other third parties such as claimants where relevant.
- Other Liberty Mutual Insurance Group companies.
- Third parties involved in the administration of an insurance policy or claim. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts including medical experts.
- Our insurance partners such as other brokers and insurers.
- Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance.
- Third parties who provide sanctions checking services.
- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers.
- Our regulators including Swiss Financial Market Supervisory Authority FINMA.
- The police, other tax authorities and other crime prevention and detection agencies.
- Third party suppliers, agents and contractors appointed by Liberty Specialty Markets or the Liberty Mutual Insurance Group to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, client relationship system providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Any agent or representative acting for you. Any other person where necessary to perform any insurance contract, in order to protect ourselves from risk or to ensure regulatory compliance or good governance
- Anyone where strictly necessary in order to protect you in case of emergency.

### 3.6. Users of the Liberty Specialty Markets websites or platforms and event attendees

If you are a user of the Liberty Specialty Markets website (or a platform that links through to this Notice), this section will be relevant to you and sets out our uses of your personal data.

#### What personal data will we collect?

- General information submitted via the website or platform, for example where you provide your details in the contact section such as your name, contact details and company name.
- Information obtained through our use of cookies. You can find more information about this in our cookies policy in the Cookies section below.
- Information obtained through a sign up form for an event or promotion.

### What sensitive personal data will we collect?

We do not anticipate collecting special category data through the website. However, where relevant, we may collect dietary requirements for an event or you might submit special category data through a query or complaint, the collection or transfer of which may directly or indirectly reveal:

- Information on your state of health, with regard to authorization 31 of the CNIL.
- Information on your religious beliefs, in accordance with the NS 56 standard of the CNIL.

### How will we collect your personal data?

Your personal data may only be collected in cases permitted by law.

- We will collect your information directly from our website or a platform that links you through to our website.
- Our websites may also collect your device's unique identifier, such as an IP address.

### What will we use your personal data for?

We may use your personal data for a number of different purposes. In each case, we must have a "legal ground" to do so. We will rely on the following "legal grounds" when we process your "personal data":

- We need to use your personal data to enter into or perform the insurance contract that we hold with you. For example, we need to use your personal data to respond to your enquiry about a quote.
- We have a legal or regulatory obligation to use such personal data. For example, our regulators require us to hold certain records of our dealings with you.
- We need to use your personal data for a legitimate interest (e.g. to monitor the number of visitors to our website, to keep business records and to develop and improve our products and services). When using your personal data for these purposes, we will always consider your rights and interests.

When the information that we process is classed as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when we process your "sensitive personal data":

- We need to use your sensitive personal data for purposes relating to an insurance policy or claim and there is a substantial public interest in such use. Such purposes include assessing an insurance application, managing claims and preventing and detecting fraud.
- We need to use your sensitive personal data to establish, exercise or defend legal rights. This might happen when we are faced with legal proceedings or want to bring legal proceedings ourselves.
- You have provided your consent to our use of your sensitive personal data (e.g. in relation to your marketing preferences).
- Sensitive personal data have been made public by you.

Purpose for processing	Legal grounds for using your personal data	Legal grounds for using your sensitive personal data
<b>To register you as a user of the website (including recording information on our server logs from your browser, including your IP address and the page you requested).</b>	We have a legitimate interest (to allow you to use the website and ensure its proper functionality).	N/A
<b>To follow up on enquiries you make.</b>	We have a legitimate interest (to respond to your queries).	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• Such use is necessary for insurance purposes.</li> </ul>
<b>To provide marketing information to you.</b>	We have a legitimate interest (to send you selected	You have given us your explicit consent.

	communications about other products and services we offer).	
<b>To allow you to apply for a recruitment opportunity and for our subsequent management of your application.</b>	We have a legitimate interest (to ensure that your application is processed and managed effectively).	You have given us your explicit consent.
<b>To allow you to apply for an event and our subsequent management of the event.</b>	We have a legitimate interest (to enable you to register for the event).	You have given us your explicit consent.
<b>To store your details on our Customer Relationship Management systems.</b>	We have a legitimate interest (to improve our relationship with you)	You have given us your explicit consent.

### Who will we share your personal data with?

We will keep your personal data confidential and we will only share it where necessary for the purposes set out above with our Liberty Mutual Insurance Group companies, our agents or contractors.

### 3.7. Prospective job applicants

If you are applying for a job with us, this section will be relevant to you and sets out our uses of your personal data.

#### What personal data will we collect?

- General information such as your name, address, contact phone numbers and email addresses, date of birth and gender.
- Information about your job such as job title and previous roles.
- Information about your right to work
- Information about your gender identity, caring responsibilities and socio-economic background data. This information will be provided by you on a voluntary basis and will be processed on an aggregated basis to monitor our compliance with our equal opportunities policy.
- Other information (including publically available information) obtained as part of our due diligence checks.
- In the event you attend events with us, we may collect relevant details e.g. your event preferences, dietary requirements etc.

#### What sensitive personal data will we collect?

- Data relating to your possible convictions, in the only cases where the collection of this data corresponds to a legitimate interest and appears proportionate and justified with regard to your fundamental right to privacy (for example, for imperative security reasons that are characteristic of the position for which you are applying).
- If your CV contains sensitive data disclosed by you, such as trade union membership, or if you participate in our events and provide us with dietary preferences that may reveal information about your health or religious beliefs, such data will be collected to the extent strictly necessary and/or unavoidable, but should not be taken into account in the recruitment process or for any purpose related to that process.

#### How will we collect your information?

Your personal data may only be collected in cases permitted by law.

As well as obtaining information directly from you, we will collect information from service providers e.g. recruitment companies you have instructed.

Note: If you send us your CV or an unsolicited application by e-mail, we will store it in our recruitment portal for 6 months from the date of communication of your CV or your last contact with us, unless you object.

### What will we use your personal data for?

The use of your personal data is strictly limited to the purpose of concluding or executing an employment contract with you. For example, we may need certain information to enable us to make a job offer.

We may use your personal data for a number of different purposes. In each case, we must have a "legal ground" to do so. We will rely on the following "legal grounds", when we process your "personal data":

- We have a legal or regulatory obligation to use such personal data. For example, we may be required to carry out certain background checks.
- We need to use your personal data for a justifiable purpose (for example, to keep your CV on file in case future opportunities arise). The use of such data shall be limited to what is strictly necessary for the purpose in question and shall be subject to the applicable data retention periods. Furthermore, we take due account of your rights and interests in the use of your personal data for these purposes.
- Where the data we process is sensitive personal data, we must, exceptionally, justify a legitimate reason, to the extent justified by the specific case that applies to you, and subject to your prior consent.

Purpose for processing	Legal grounds for using your personal data	Legal grounds for using your sensitive personal data
<b>For business and management processes and activities including analysis, review, planning, business transactions and IT (hosting, support and security).</b>	We have a legitimate interest (to effectively manage our business).	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• Such use is necessary in the substantial public interest.</li> </ul>
<b>To comply with our legal or regulatory obligations.</b>	We need to use your information in order to comply with our legal obligations.	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> <li>• Such use is necessary for employment law purposes</li> </ul>
<b>To manage and handle your queries.</b>	<ul style="list-style-type: none"> <li>• We have a legitimate interest (to effectively manage our business and respond to queries).</li> <li>• It is necessary to enter into or perform our contract with you.</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> </ul>
<b>For recruitment administration purposes.</b>	We have a legitimate interest (to operate our recruitment function).	You have given us your explicit consent.

### Who will we share your personal data with?

We ensure the confidentiality of these data, which will be communicated only to the extent necessary, i.e., as a general rule, to the data controller as well as to the persons directly involved in the recruitment process within the Liberty Mutual Insurance Group company offering the position.

In addition, data will only be shared to the extent necessary for the purposes set out above and with the following third parties:

- Other Liberty Mutual Insurance Group companies (both inside and outside the European Economic Area or Switzerland) and their service providers.
- Third parties involved in the hosting, analysis and supply of recruitment services
- Third party suppliers, agents and contractors appointed by Liberty Specialty Markets or the Liberty Mutual Group to help us carry out our everyday business activities including IT suppliers, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Any agent or representative acting for you.
- A select group of third party suppliers used to host and manage our recruitment portals ( based in the USA).

### 3.8. External Visitors to our offices

If you will be visiting one of our offices, this section will be relevant to you and sets out our uses of your personal data. What personal data will we collect?

- General information such as your name, address, contact phone numbers and email addresses.
- Information about your job such as job title and reason for visiting the office.

#### What sensitive personal data will we collect?

We may need to use your sensitive personal data in case of emergency.

#### How will we collect your information?

We will ordinarily obtain information directly from you.

#### What will we use your personal data for?

We may use your personal data for a number of different purposes. In each case, we must have a "legal ground" to do so. We will rely on the following "legal grounds", when we process your "personal data":

- We need to use your personal data to record your access for security reasons.
- We have a legal or regulatory obligation to use such personal data. For example, we may be required to comply with Health and Safety laws and regulations.

When the information that we process is classed as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when we process your "sensitive personal data":

- We need to use such special category data to protect vital interests.

Purpose for processing	Legal grounds for using your personal data	Legal grounds for using your sensitive personal data
For business management	We have a legitimate interest (to effectively manage our business and ensure secure access to our premises).	N/A
To comply with our legal or regulatory obligations.	We need to use your information in order to comply with our legal obligations.	We need to use your information in order to ensure health and safety in our premises
To provide protection in case of emergency.	The processing is necessary in order to protect your vital	The processing is necessary in order to protect your vital interests or those of another person



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interests or those of another person

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You have provided your consent to our use of your sensitive personal data.

#### **Who will we share your personal data with?**

We will keep your personal data confidential, and we will only share it where necessary for the purposes set out above with the following parties:

- Other Liberty Mutual Insurance Group companies (both inside and outside the European Economic Area) and their service providers.
- Third parties providing security services.
- The emergency services and other public bodies.
- Any agent or representative acting for you.

#### **3.9. Children**

In the course of providing our products and services, we may process the personal data of people under the age of eighteen years old in a limited number of instances. This may, for example, be where a child's details are passed to us as part of an insurance claim. We have created a dedicated privacy policy to help children understand our collection and use of their personal data, that can be [viewed here](#).

#### **4. What marketing and/or profiling activities do we carry out?**

##### **Marketing:**

We will only send marketing communications to our business contacts. This may be done by post, email or telephone. In each case, we will give you the opportunity to opt out. You can also opt out at any time by contacting us using the details set out in section 10.

##### **Profiling:**

Profiling is integral to the offering of insurance. We assess the risk that you would like to insure (e.g. the risk of your home being damaged by a flood) against the likelihood of that event occurring (e.g. based on the geographical location of your property and history of floods in the area). We use this profiling to help us decide whether or not to offer you insurance, the terms and the price of your policy.

While carrying out necessary due diligence (e.g. sanctions checks) on our business partners, potential customers, and other people we may do business with, we may need to provide a limited set of your information to third party vendors who assist us with this process. Their processing may involve an element of profiling. We do not make automated decisions based on this processing.

Whilst we use profiling to help us make our decisions, it is always a member of our team who makes a decision taking into account the profiling outcome and other relevant factors.

#### **5. How long do we keep personal data for?**

We will keep your personal data for as long as reasonably necessary to fulfil the purposes set out in section 3 above and to comply with our legal and regulatory obligations.

We have a detailed retention policy in place which governs how long we will hold different types of information for. The exact time period will depend on your relationship with us and the type of personal data we hold, for example:

- if we provide quote for a policy but this is not taken up by you (or on your behalf) then we hold the associated information for 36 months.
- if you make a claim under a policy we provide, we will keep your personal data for 10 years from the date on which the claim is closed.

If you would like further information regarding the periods for which your personal data will be stored, please contact us using the details set out in section 10.

## 6. What is our approach to sending your personal data overseas?

Sometimes we (or third parties acting on our behalf) will transfer personal data that we collect about you to countries outside of the European Economic Area ("EEA") or Switzerland.

In the event of a transfer of your personal data, we take the necessary measures to protect your personal data in accordance with the requirements of the competent data protection authorities, using a number of different methods governed by the legal and regulatory provisions applicable to the transfer, including:

- putting in place appropriate contracts. We will use a set of contract wording known as the "standard contractual clauses" which has been approved by the data protection authorities.

Depending on our relationship and your particular circumstances, we might transfer personal data anywhere in the world. For example, if you have a personal accident policy with us and are injured, we may need to instruct medical experts or other service providers in the country you are injured in. A summary of our regular data transfers outside the EU is set out below:

Country of transfer	Reason for the transfer	Method we use to protect your information
<b>United States and the UK</b>	Transfer to Liberty Mutual Group Companies in the US - Reporting to our parent company, IT support and hosting, centralised business functions in the United States and the UK.	Robust IT Security Standards employed and Standard Contractual Clauses
<b>United States and the UK</b>	Transfer to service providers to enable us to perform our business.	Supplier due diligence, contracts, audits and Standard Contractual Clauses.
<b>India</b>	Transfer to service providers to enable us to perform our business.	Supplier due diligence, contracts, audits and Standard Contractual Clauses.
<b>Dubai</b>	Liberty Specialty Markets MENA Limited is a Liberty Specialty Markets company registered in the Dubai International Financial Centre.	IT Security Standards employed and Standard Contractual Clauses.
<b>Brazil , Columbia and China</b>	Service providers have access to certain applications for risk analysis and policy processing.	IT Security Standards employed and Standard Contractual Clauses.

If you would like further information regarding our data transfers and the steps we take to safeguard your personal data, please contact us using the details set out in section 10.

## 7. How do we protect your personal data?

Liberty Specialty Markets takes security of your information very seriously. We maintain appropriate technical, organisational, and physical safeguards designed to protect the personal data we process in accordance with client instructions and in line with our legal and regulatory obligations. The security measures in place on our website and computer systems are in place to protect the loss, misuse or alteration of the information you provide to us. We keep your personal data only for as long as reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

The Liberty Mutual Group has a number of Information Security Standards that apply depending on the data type and data location. These standards cover access controls, encryption, network and host security, physical security, data recovery and business continuity. Our standards change from time to time as we react to market challenges and changing regulatory requirements.

Because e-mails submitted via this website are not protected by the same security measures we use in other areas where we actively collect information, you should be particularly careful in deciding what information you wish to send to us via e-mail.

In the event that you become aware of any actual or potential misuse of any such information or for more information on IT Security please contact us using the details set out in section 10.

## **8. Your rights**

Under data protection law you have a number of rights in relation to the personal data that we hold about you which we set out below. You can exercise your rights by contacting us at any time using the details set out in section 10. We will not usually charge you in relation to a request.

Please note that although we take your rights seriously, there may be some circumstances where we cannot comply with your request such as where complying with it would mean that we couldn't comply with our own legal or regulatory requirements. In these instances we will let you know why we cannot comply with your request.

In some circumstances, complying with your request may result in your insurance policy being cancelled or your claim being discontinued. For example, if you request erasure of your personal data, we would not have the information required to pay your claim. We will inform you of this at the time you make a request.

### **- The right to access your personal data**

You are entitled to a copy of the personal data we hold about you and certain details of how we use it.

We will usually provide your personal data to you in writing unless you request otherwise. Where your request has been made electronically (e.g. by email), a copy of your personal data will be provided to you by electronic means where possible.

### **- The right to rectification**

We take reasonable steps to ensure that the information we hold about you is accurate and where necessary up to date and complete. If you believe that there are any inaccuracies, discrepancies or gaps in the information we hold about you, you can contact us and ask us to update or amend it.

### **- The right to restriction of processing**

In certain circumstances, you are entitled to ask us to stop using your personal data, for example where you think that the personal data we hold about you may be inaccurate or where you think that we no longer need to use your personal data.

### **- The right to withdraw your consent**

Where we rely on your consent in order to process your personal data, you have the right to withdraw such consent to further use of your personal data.

Please note that for some purposes, we need your consent in order to provide your policy. If you withdraw your consent, we may need to cancel your policy or we may be unable to pay your claim. We will advise you of this at the point you seek to withdraw your consent.

### **- The right to erasure**

This is sometimes known as the 'right to be forgotten'. It entitles you, in certain circumstances, to request deletion of your personal data. For example, where we no longer need your personal data for the original purpose we collected it for or where you have exercised your right to withdrawn consent.

Whilst we will assess every request, there are other factors that will need to be taken into consideration. For example we may be unable to erase your information as you have requested because we have a regulatory obligation to keep it.

- **The right to object**

**Marketing:** You have control over the extent to which we market to you and you have the right to request that we stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" button in any email that we send to you or by contacting us using the details set out in section 10.

Please note that even if you exercise this right because you do not want to receive marketing messages, we may still send you service related communications where necessary.

**Processing based on our legitimate interests:** Where we process your personal data based on our legitimate interests, you can object to our processing. We will consider your objection and determine whether or not our legitimate interests prejudice your privacy rights.

- **The right to data portability**

In certain circumstances, you can request that we transfer personal data that you have provided to us to a third party.

- **Rights relating to automated decision-making**

We do not carry out any automated decision making. If this changes in the future, we will provide you with an updated notice setting out our decision making process.

- **The right to make a complaint with the Regulator**

You have a right to complain to the Federal Data Protection and Information Commissioner (FDPIC) or any other local Data Protection Regulator if you believe that we have breached data protection laws when using your personal data.

You can visit the website of the FDPIC at <https://www.edoeb.admin.ch/edoeb/en/home.html> for more information.

Please note that lodging a complaint will not affect any other legal rights or remedies that you have.

## 9. Cookies

By visiting and using this website, you indicate your acceptance of Liberty Specialty Markets' use of cookies, which are small files consisting of letters and numbers placed on your computer by Liberty Specialty Markets. Please note that the validity of your consent cannot exceed 13 months.

You can choose not to be tracked by visiting or using our site. Indeed, you can configure your browser to refuse cookies, delete them or be informed if a cookie is deposited. The "Help" section on the menu bar of most web browsers will explain how to do this. You can also remove and block them, but this may interfere with the proper functioning of our site and you may not be able to access certain parts of the site.

The purpose of these cookies is to allow us to recognize visitors, measure their number and track their navigation on our site. Some cookies are necessary to allow you to access our website and to facilitate your navigation.

Our site may contain links to third party websites (including sites of Liberty Mutual Insurance Group companies) which may also use cookies and over which we have no control. We therefore recommend that you consult the privacy policies of the third parties concerned in order to obtain information about the cookies they use.

For more information about cookies and how to delete them, visit <http://www.allaboutcookies.org/>.

If you want to know more about the cookies we use on this website [please click here](#).

## 10. Contacting us

If you would like further information about any of the matters in this notice or if have any other questions about how we collect, store or use your personal data, you may contact our Data Protection Officer at

dataprotectionofficer@libertyglobalgroup.com or by writing to Data Protection Officer, Liberty Specialty Markets, 20 Fenchurch Street, London, EC3M 3AW.

Please note that we are not responsible for the privacy policies or content of any websites linked to this website, (including websites of companies within the Liberty Mutual Insurance Group).

#### **11. Updates to this privacy & cookies notice**

From time to time we may need to make changes to this notice, for example, as the result of changes to law, technologies, or other developments. We will provide you with the most up-to-date notice and you can check our website [here](#) periodically to view it.

This notice was last updated on 15th February 2023.