

PRIVACY NOTICE

Mithras Underwriting Limited is a company part of the BDB Group and is an independent wholesale insurance intermediary (i.e. we deal as business to business, b2b) and through our network of external producing intermediaries (i.e. the intermediaries that require services from us) offer to the Assured(s) and Policyholder(s) the benefit of our knowledge, service, experience and expertise across a range of insurance classes through a number of operating divisions.

We endeavour to ensure the privacy and the confidentiality of personal data.

We may receive via local producing intermediaries personal data about individuals relating to potential or actual policyholders, beneficiaries under a policy, their family members, claimants and other parties involved in a claim during the insurance lifecycle. Therefore references to “**we/us**” in this notice include any company part of the BDB Group – hence including **Mithras Underwriting Limited** - and “**you/your/their**” includes individuals or third parties. This notice sets out our use of this personal data and the disclosures we make to other **insurance market participants** and other **third parties**.

In order for us to provide these services we, and other participants in the Insurance industry use and share personal data.

[For an overview of how and why the Insurance industry uses and shares personal data please, see https://www.londonmarketgroup.co.uk/gdpr.](https://www.londonmarketgroup.co.uk/gdpr)

IMPORTANT: This Privacy Notice governs our use of your personal data and is not designed to replace any insurance policy or contract that you may hold directly or indirectly with us.

OUR COMMITMENT TO PRIVACY

- As insurance intermediaries we are committed to observing your privacy rights under the General Data Protection Regulation (GDPR) and UK Data Protection laws as relevant to the business we conduct.
- We recognise the importance of the personal data that you entrust to us in order to conduct our business with you.
- We understand that it is our duty to tell you how we will hold and use your personal data.
- We believe in the importance of being fully transparent in our dealings with you.
- We will only collect, hold and process your personal data with your consent for specific processing purposes. We understand that it is important to allow you to withdraw your consent at any given stage of the processing or after conclusion of a contract. Please bear in mind that if you withdraw consent this may affect our ability to provide services to you.
- Our physical and technological security measures are designed to protect your Personal and Sensitive Data and demonstrate our continuing commitment to the GDPR and UK Data Protection laws.
- We firmly believe that you should be able to make privacy choices that are right for you. We understand that it is our duty to make sure your Personal Data is accurate and kept up to date.
- We are dedicated to invest in continuously training and educating our employees in their privacy obligations under the GDPR and UK Data Protection laws.

In this notice:

- we, us or our** refers to the relevant **insurance market participant**.
- you or your,** refers to the individual whose **personal data** [may be/is being] processed by an **insurance market participant (you may be the insured, beneficiary, claimant or other person involved in a claim or relevant to a policy)**.

There are other terms in **bold** with specific meanings. Those meanings can be found in the Glossary.

CONSENT AND USE OF INFORMATION

We are responsible for ensuring compliance with the relevant laws relating to data protection and meeting the regulator's expectations with regard to information security. We collect information about you in order to deliver our services and for other legitimate reasons. In doing so, we take your privacy and our obligations seriously in accordance to our industry standards and good practice. (<https://www.lloyds.com/common/privacy-notices>)

In some cases, in order to comply with our legal obligations and applicable regulatory requirements, we will obtain your consent to the use of your personal information.

If you provide us with any information which constitutes "personal data" (including any "sensitive personal data" or "special category data"), both you and we will treat such information at all times in accordance with "Data Privacy Laws" and the EU GDPR Directive

BDB Group companies - including **Mithras Underwriting Limited** - may hold and process such information:

- (i) in order to provide our services to you;
- (ii) to facilitate the effective management, development or operation of the BDB Group companies; and
- (iii) in any country – including countries outside the European Economic Area, which may not have comparable data protection laws.

By submitting your information to us (including a request to receive further information), by registering with our B2B website and/or by completing an application for a job vacancy, BDB Group - including **Mithras Underwriting Limited** - may use your information in the ways outlined in this privacy notice, including any transfer outside the EEA.

You confirm any information given by you is true and complete. You agree that you will not provide any information which constitutes personal data (including any sensitive or special category personal data) to us unless you have ensured that you have obtained all necessary consents and provided any required notices (in particular informing data subjects that their personal data will be anonymised and used for analysis purposes), or that you are otherwise permitted to provide such information to us, so that such information you provide to us can be lawfully used or disclosed in the manner and for the purposes set out in this notice. You will also ensure that any such information you do provide to us is relevant for such purposes, and is reliable for its intended use, accurate, complete and current.

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 (which is available at <http://www.lmalloyds.com/GDPR>) 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.

This notice sets out the following:

- ✓ INTRODUCTION – HOW THE INSURANCE MARKET WORKS
- ✓ THE DATA WE MAY COLLECT ABOUT YOU (YOUR PERSONAL DATA)
- ✓ WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM
- ✓ IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS
- ✓ THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA
- ✓ CONSENT
- ✓ PROFILING
- ✓ RETENTION OF YOUR PERSONAL DATA
- ✓ INTERNATIONAL TRANSFERS
- ✓ COOKIES WE USE
- ✓ YOUR RIGHTS AND CONTACT DETAILS
- ✓ GLOSSARY OF KEY TERMS

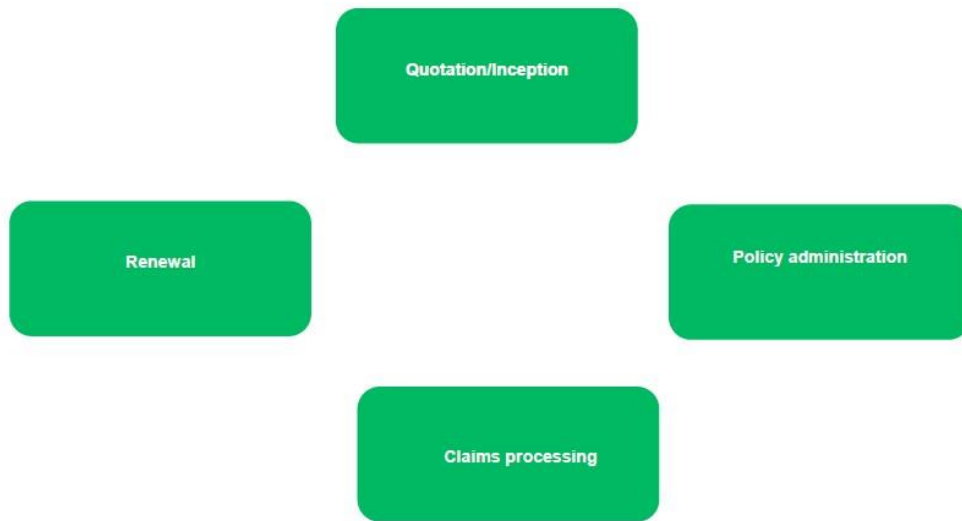
INTRODUCTION - HOW THE INSURANCE MARKET WORKS

INSURANCE MARKET AND MARKET PARTICIPANTS: BACKGROUND

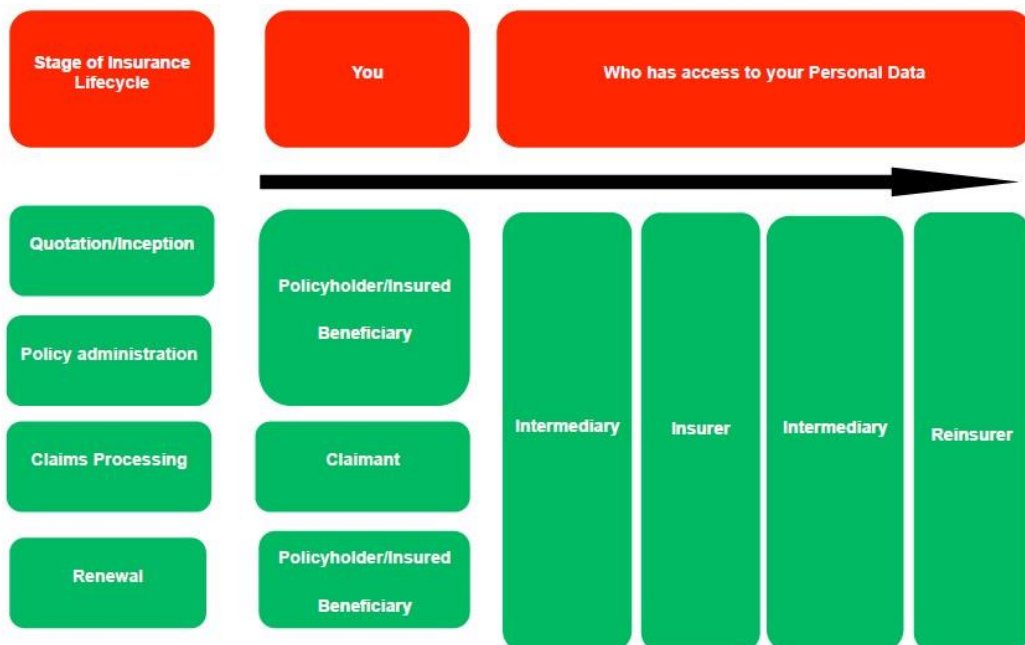
Insurance is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to do this, information, including your **personal data**, needs to be shared between different **insurance market participants**. The insurance market is committed to safeguarding that information.

This notice is designed to help you understand how the **insurance market participants** process your **personal data** through the **insurance lifecycle**.

INSURANCE LIFECYCLE



FLOWS OF PERSONAL DATA THROUGH THE INSURANCE LIFECYCLE



THE DATA WE MAY COLLECT ABOUT YOU (YOUR PERSONAL DATA)

In order for **us** to provide insurance quotes, insurance policies, and/or deal with any claims or complaints, **we** need to collect and process personal data about **you**.

The type of personal data that we collect depends on the nature of our interaction and relationship with you (for example, typically we receive a submission from retail insurance intermediaries, so you may be the client of a local direct intermediary or a third-party administrator such as loss adjuster, a claims expert or a lawyer). So, In general terms the following are an example of the personal data we may collect (but this list is not exhaustive):

Types of Personal Data Details

Individual details:	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you .
Identification details: <i>issued by government bodies and agencies</i>	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number.
Financial information:	Bank account or payment card details, income or other financial information.
Risk details:	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to your health, criminal convictions, or other special categories of personal data . For certain types of policy, this could also include telematics data .
Policy information:	Information about the quotes you receive and policies you take out.
Credit and anti-fraud Data:	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you .
Previous and current Claims:	Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data and in some cases, surveillance reports.
Special categories of personal data: <i>(formerly known as sensitive data)</i>	Certain categories of personal data which have additional protection under the GDPR . The categories are: health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation.

WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

We only collect personal data by lawful and fair means and only ask for personal and special categories of personal data that we need. Our aim is to always be open and transparent in our dealings with you.

We might collect **your personal data** from various sources, including:

- **you** when you apply for a policy through your insurance agent that contact us as producing intermediary (as part of our wholesale network);
- **your** family members, employer or representative;
- third party who may be applying for a policy for which you are a beneficiary or a named individual;
- other **insurance market participants**;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies (e.g., motor and tax agencies);
- open electoral register; or
- Third parties, including those related to the administration or processing of claims (for instance, in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers)

IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS

The **insurance lifecycle** involves the sharing of **your personal data** between **insurance market participants**, some of which **you** will not have direct contact with. In addition, **your personal data** may not have been collected directly by an **insurance market participant**.

You can find out the identity of the initial **data controller** of **your personal data** within the insurance market life-cycle in the following ways:

- Where you took out the insurance policy yourself:

the **insurer** and, if purchased through an **intermediary**, the **intermediary** will be the initial **data controller** and their **data protection contact** can advise **you** on the identities of other **insurance market participants** that they have passed your **personal data** to.

- Where your employer or another organisation took out the policy for your benefit:

you should contact **your** employer or the organisation that took out the policy who should provide **you** with details of the **insurer** or **intermediary** that they provided **your personal data** to and **you** should contact their **data protection contact** who can advise **you** on the identities of other **insurance market participants** that they have passed **your personal data** to

- Where you are not a policyholder or an insured:

you should contact the organisation that collected **your personal data** who should provide **you** with details of the relevant **participant's data protection contact**.

THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

Background:

The UK's data protection law and the European GDPR rules and regulation allows the use of personal data where its purpose is legitimate and isn't outweighed by the interests, fundamental rights or freedoms of data subjects.

The law calls this the Legitimate and Vital Interests condition for personal data processing. The Legitimate Interests being pursued here are:

- Promoting the responsible selection of relevant products.
- Helping prevent and detect crime and fraud and anti-money laundering. services and verify identity.
- Supporting tracing and collections.
- Complying with and supporting compliance with legal and regulatory requirements.

BDB Group's use of your personal data- including **Mithras Underwriting Limited's** - is subject to an extensive framework of safeguards (eg, very strong access control, strong network control, regularly tested, network monitoring) that help make sure that people's rights are protected. These include the information given to people about how their personal data will be used and how they can exercise their rights to obtain their personal data, have it corrected or restricted, object to it being processed, and complain if they are dissatisfied. These safeguards help sustain a fair and appropriate balance so BDB Group's activities - including **Mithras Underwriting Limited's** - do not override the interests, fundamental rights and freedoms of data subjects.

We process personal data for certain legitimate interests, which may include the following:

- to enable us to determine what insurance products and services that we may arrange for you and the terms of those services;
- to identify and prevent fraud.

When we process your personal data for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests.

We collect, use and store your personal data to:

- Manage our relationship, through our producing independent intermediaries, with you as a client or policyholder or prospective client or a policyholder;
- Manage the lifecycle of a risk including adjustments, renewals and claim processes;
- Investigate potential crime, including fraud and money laundering and to analyse other commercial risks within the sector;
- Manage and resolve complaints and to handle requests for data access, rectification and withdrawal of consent; **We** set out below the purposes **insurance market participants** might use **your personal data** for.

PURPOSES

Quotation/Inception:

- Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks
- Evaluating the risks to be covered and matching to appropriate policy/ premium
- Payment of premium where the insured/policyholder is an individual

Policy administration:

- Client care, including communicating with you and sending you updates
- Payments to and from individuals

Claims Processing:

- Managing insurance and reinsurance claims
- Defending or prosecuting legal claims
- Investigation or prosecuting fraud

Renewals:

- Contacting the insured/policyholder to renew the insurance policy
- Evaluating the risks to be covered and matching to appropriate policy/premium
- Payment of premium where the insured/policyholder is an individual

Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period:

- Complying with our legal or regulatory obligations
- General risk modelling
- Transferring books of business, company sales & reorganisations

Please note that in addition to the disclosures **we** have identified against each purpose, **we** may also disclose **personal data** for those purposes to our service providers, contractors, agents and group companies that perform activities on **our** behalf.

CONSENT

In order to provide insurance cover and deal with insurance claims in certain circumstances **insurance market participants**, including **us**, may need to process **your special categories of personal data**, such as medical and criminal convictions records, as set out against the relevant purpose.

Your consent to this processing may be necessary for the insurance market participant to achieve this.

If you have provided your consent but want to withdraw it, you may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our ability to provide insurance or pay claims.

PROFILING AND AUTOMATIC DECISION MAKING

Although BDB Group companies do not carry out any activity of profiling and automatic decision making processes using large scale data processors and systems, when calculating insurance premiums **insurance market participants** may compare your **personal data** against industry averages. Your personal data may also be used to create the industry averages going forwards. This is known as profiling and is used to ensure premiums reflect risk.

Profiling may also be used by **insurance market participants** to assess information you provide to understand fraud patterns.

Where **special categories of personal data** are relevant, such as medical history for life insurance or past motoring convictions for motor insurance, **your special categories of personal data** may also be used for profiling.

Insurance market participants might make some decisions based on profiling and without staff intervention (known as automatic decision making). **Insurance market participants** will provide details of any automated decision making they undertake without staff intervention in their information notices [and upon request] including:

- where they use such automated decision making
- the logic involved
- the consequences of the automated decision making
- any facility for **you** to have the logic explained to **you** and to submit further information so the decision may be reconsidered.

RETENTION OF YOUR PERSONAL DATA

We are committed to making sure that the personal data we process is reliable and accurate.

We will keep and store **your** personal data only for so long as is necessary, for the purpose for which it was originally collected, and for the purposes for which you have consented to. In particular, for so long as there is any possibility that either **you** or **we** may wish to bring a legal claim under this insurance, or where **we** are required to keep **your personal data** due to legal or regulatory reasons.

*(please note that in the UK on average it is required to hold data for 6 years after the expiry of the effectiveness of the policy/product, which can be in certain circumstances over 25 years, depending on the nature of the business, policy terms and conditions and claims status. In addition, **please note that as international insurance intermediaries we will comply with the relevant local jurisdiction to which the product relates and the location of the risk, therefore similar local requirements for data retention may apply**)*

We are committed to ensuring data which is no longer required by our business will be destroyed or put beyond use.

INTERNATIONAL TRANSFERS

Due to the international nature of our business **we** may need to transfer **your** data to **insurance market participants** or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the **GDPR**.

We will always make sure that appropriate steps are taken to safeguard the international transfer of **your** personal data. Any transfers to third parties outside of the EEA will be protected by contractual commitments and an assurance by all parties to abide by the stringent requirements of the GDPR.

If **you** would like further details of how **your personal data** would be protected if transferred outside the EEA, please contact the **data protection contact** of the relevant **participant**.

COOKIES WE USE

Our website uses cookies to enhance the user's experience. Below are the Cookies linked to our website:

Cookie name	Cookie description
cb-enabled	<p>This cookie is associated with a free script which shows a cookie alert notice on a website. It is used to record when the user has dismissed the notice to prevent it re-appearing on return visits.</p> <p>The main purpose of this cookie is: Strictly Necessary</p>
CONSENT	<p>This cookie carries out information about how the end user uses the website and any advertising that the end user may have seen before visiting the said website.</p> <p>This is a third party persistent cookie</p> <p>Persistent cookies are also used to track visitor behaviour as you move around a site, and this data is used to try and understand what people do and don't like about a site so it can be improved. This practice is known as <i>Web Analytics</i>.</p>
PHPSESSID	<p>Cookie generated by applications based on the PHP language. This is a general purpose identifier used to maintain user session variables. It is normally a random generated number, how it is used can be specific to the site, but a good example is maintaining a logged-in status for a user between pages.</p> <p>This is a first party session cookie</p>

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The main purpose of these cookies is: **Performance**

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

These cookies are for Google Analytics.

YOUR RIGHTS AND CONTACT DETAILS

What are your rights in respect of personal data?

If, having given your consent to the use of your data, you subsequently change your mind, you can stop all, or particular uses of your data by sending an email to dpo@bdbltd.co.uk.

Individuals have a right to: (i) request personal data held about them to be corrected, supplemented, blocked or deleted if the data is factually incorrect, incomplete or irrelevant for the purposes described herein or where it is being processed in a manner which in any way infringes applicable law; and/or (ii) request a copy of the personal data we hold about them. To obtain details of data held by us about you, please write to:

The Data Protection Officer, BDB Group - 52-54 Leadenhall Street - London EC3A 2BJ or by e-mail dpo@bdbltd.co.uk.

Your request should make it clear what type of information you are seeking. **No fee is payable for such a request.** Upon receipt of your request, and where all of our requirements to process such a request have been met in full, we shall respond within one calendar month of receipt.

Under certain conditions:

- **You have the right to access your personal data that we hold about you.**
We will give you a copy of your data and we will disclose how your data is being processed.
We are committed to being transparent and will provide you with a description as to what personal data we collected, how we used it, who we disclosed it to, how we protect it and how long it will be/has been stored.
- **You have the right to correct any personal data held by us which you believe could be inaccurate or incomplete or not up-to-date.**
We may seek to check the accuracy of the personal data in question. If your personal data has been passed onto a Third Party we will inform them of the rectification where possible and disclose the details of that Third Party to you.
- **You have the right to object to our processing of your personal data.**
We are committed to ensuring your interests, fundamental rights and freedoms are properly balanced against our legitimate interests. This will not apply in the following instances:
 - Where we can provide compelling legitimate grounds for the processing to continue and override the interests, rights and freedoms of the individual;
 - Where processing is necessary for legal claims.
- **You have the right for your personal data to be destroyed or put beyond use.**
This will only apply where the personal data is no longer valid for the original purpose that it was collected for, where you have withdrawn consent, where you have objected to the personal data being processed.

- **You have the right to restrict the processing of personal data.**

This will apply only in the following instances:

- Where the accuracy of the personal data is challenged and needs to be checked.
- Where we have considered the processing of your personal data to be unlawful.
- Where we may not require the personal data any longer but you wish to pursue or defend a legal claim.

- **You have the right to ask for data portability.**

We will investigate your request and if appropriate we will seek to provide the personal data to you in a commonly used and machine readable form.

- where processing is based on consent, **You have the right to withdraw your consent** so that we stop that particular processing;

Please note that in certain circumstances, **we** may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and **our** interests (e.g. the maintenance of legal privilege).

Who to contact or complain to about your Personal Data that we hold.

If you have any questions about our use of your personal data or you wish to access any of the personal data that we hold about you, you can contact **The Data Protection Officer of the BDB Group**:-

Address: 52-54 Leadenhall Street, London, EC3A 2BJ

Telephone: +44 (0) 203 906 6200

Email: dpo@bdbltd.co.uk

Should you wish to make a complaint about how we use **your personal data**, we would welcome your contact so that we have the opportunity to resolve the issue to your satisfaction.

You also have the right to refer any complaint to the Information Commissioner's Office (**ICO**), the body that regulates the handling of personal data in the UK. You can contact them by:

- Phone on 0303 123 1113;
- Writing to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF;
- Going to their website at www.ico.org.uk.

You also have the right to refer any complaint to the Data Protection Authority (**DPA**), the body that regulates the handling of personal data in Belgium. You can contact them by:

- Phone on +32 (0)2 274 48 00;
 - Writing to them at Data Protection Authority, Rue de la Presse 35, 1000 Brussels;
 - Going to their website at www.dataprotectionauthority.be.
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GLOSSARY

Key insurance terms:

Beneficiary	is an individual or a company that an insurance policy states may receive a payment under the insurance policy if an insured event occurs. A beneficiary does not have to be the insured/policyholder and there may be more than one beneficiary under an insurance policy .
Claimant	is either a beneficiary who is making a claim under an insurance policy or an individual or a company who is making a claim against a beneficiary where that claim is covered by the insurance policy .
Claims processing	is the process of handling a claim that is made under an insurance policy.
Quotation	is the process of providing a quote to a potential insured/policyholder for an insurance policy .
Inception	is when the insurance policy starts.
Insurance	is the pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of insurance. The expression insurance may also mean reinsurance .
Insurance policy	is a contract of insurance between the insurer and the insured/policyholder .
Insurance market participant(s) or participants:	is an intermediary, insurer or reinsurer .
Insured/policyholder	is the individual or company in whose name the insurance policy is issued. A potential insured/policyholder may approach an intermediary to purchase an insurance policy or they may approach an insurer directly or via a price comparison website.
Insurers:	(sometimes also called underwriters) provide insurance cover to insured/policyholders in return for premium . An insurer may also be a reinsurer .
Intermediaries	help policyholders and insurers arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through intermediaries .
Lloyd's:	many policies are underwritten in Lloyd's of London. Lloyd's is a specialist insurance market place. To find out more about how Lloyd's operates visit www.lloyds.com .
Policy administration	is the process of administering and managing an insurance policy following its inception .
Premium	is the amount of money to be paid by the insured/policyholder to the insurer in the insurance policy .
Reinsurers	provide insurance cover to another insurer or reinsurer . That insurance is known as reinsurance.
Renewal	is the process of the insurer under an insurance policy providing a quotation to the insured/policyholder for a new insurance policy to replace the existing one on its expiry.
We, us or our	refers to the relevant insurance market participant .
You or your	refers to the individual whose personal data may be processed by an insurance market participant . You may be the insured, beneficiary, claimant or other person involved in a claim or relevant to an insurance policy .

GLOSSARY *(continuation)*

Key data protection terms:

GDPR: is the EU General Data Protection Regulation and the new UK Data Protection Act, which replaces the UK Data Protection Act 1998 from 25 May 2018.

Data controller: is an entity which collects and holds personal data. It decides what **personal data** it collects about **you** and how that **personal data** is used. Any of the **insurance market participants** when using **your personal data** for the purposes set out in Section 5 could be **data controllers**.

Data protection contact:

the person named by the relevant **insurance market participant** who **you** should contact if **you** have any queries or requests regarding your **personal data** or how **we** are using it. In many cases (although not all), this person will be the Data Protection Officer of the relevant **insurance market participant**.

Information Commissioner's Office (ICO):

is the regulator (or National Competent Authority/Data Protection Authority) for data protection matters in the UK.

Personal data:

is any data from which **you** can be identified and which relates to **you**. It may include data about any claims **you** make.

Processing of personal data:

includes collecting, using, storing, disclosing or erasing your **personal data**.