

# Privacy Policy

**This Privacy Policy tells you what data we collect, why we collect it and what we do with it.**

**You can also find information on the controls you have to manage your data within these pages.**

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## **Privacy Policy**

Waterfront are committed to ensuring your privacy and personal information is protected. Waterfront Insurance Brokers Ltd is the data controller of your personal information and is responsible for complying with data protection laws.

This Privacy Policy should be brought to the attention of any party who is included in your Policy, where they have given you consent to act on their behalf.

By providing your personal information or the personal information of someone included in your policy, you acknowledge that we may use it only in the ways set out in this Privacy Policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information.

From time to time we may need to make changes to this privacy policy, for example, as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check our website periodically to view the most up to date privacy policy.

## Privacy Policy

### 1. Our Privacy Principles

When we collect and use your personal information, we ensure we look after it properly and use it in accordance with our privacy principles set out below, keep it safe and will never sell it.

#### Our Privacy Principles

1. Personal information you provide is processed fairly, lawfully and in a transparent manner
2. Personal information you provide is collected for a specific purpose and is not processed in a way which is incompatible with the purpose which Waterfront collected it
3. Your personal information is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
4. Your personal information is kept accurate and, where necessary kept up to date
5. Your personal information is kept no longer than is necessary for the purposes for which the personal information is processed
6. We will take appropriate steps to keep your personal information secure
7. Your personal information is processed in accordance with your rights
8. Waterfront do not sell your personal information and we also do not permit the selling of customer data by any companies who provide a service to us

## 2. How do we collect your personal information?

Whilst there are a number of ways in which we collect your personal information, the two main ways we might collect personal information about you are from things you tell us yourself, and from things we ask other people or organisations to share with us. Things you tell us could include conversations we have on the phone, or in meetings, what you've written in a letter or email. We might also collect information about you from other people and organisations, such as medical professionals and credit agencies, or by checking databases, such as the electoral register. Please see below for a list of ways we collect your personal information:

We collect personal information directly from you:

- By face to face meetings
- via enquiry, registration and claim forms;
- when you purchase any of our products or services;
- through quotes and application forms;
- via our telephone calls with you, which may be recorded;
- when you provide your details to us either online or offline;

We also collect your personal information from a number of different sources including:

- directly from an individual who has a policy with us under which you are insured, for example you are a named driver on your partner's motor insurance policy;
- via third parties including:
  - your family members where you may be incapacitated or unable to provide information relevant to your policy;
  - medical professionals and hospitals;
  - third parties who assist us in checking that we are permitted to arrange cover for you such as Companies House & H M Government Sanctions Check

### 3. What personal information do we collect?

We might collect personal information, such as your contact details, information about your bank or credit cards. The information we collect depends on which product or service you're interested in for example if you are interested in obtaining car or travel insurance, we'll collect information about the car you drive or where you're planning to travel to and for medical insurance, we may ask you about you or your families' medical history. Please note, in certain circumstances we may request and/or receive "sensitive" personal information about you. For example, we may need access to health records for the purposes of providing you with a policy or processing claims, or details of any court or HMRC judgments for the purposes of preventing, detecting and investigating fraud. Please see below for a more detailed list of personal information we collect.

The information that we collect will depend on our relationship with you. Where other people are named on your policy, we may ask you to provide the information below in relation to those people too, if this is relevant to your insurance.

#### **We may collect the following information about you:**

- Personal information
  - contact details such as name, email address, postal address and telephone number
  - details of any other persons included on the policy where they are named on your policy and the relationship to you as policyholder
  - identification information such as your date of birth, national insurance number, passport and driving licence
  - financial information such as bank details, credit card details and information obtained as a result of our credit checks
  - information relevant to your insurance policy such as details about your vehicle, property, previous policies or claims, recent damage, information about your travel plans, destination, planned activities and dates of travel
  - information relevant to your claim or your involvement in the matter giving rise to a claim
  - information about the nature of your business and commercial assets
  - details of bankruptcies and other financial sanctions such as HMRC investigations
  - your marketing preferences
- Sensitive personal information
  - details of your current or former physical or mental health
  - details concerning sexual life or sexual orientation, for example marital status
  - details regarding criminal offences, including alleged offences, criminal proceedings, outcomes and sentences (previous criminal convictions, bankruptcies and other financial sanctions such as County Court Judgements)

### 4. How do we use your personal information?

We mainly use your personal information to provide you with an insurance policy or benefits and to provide you with the right services based on your situation. So, if you have a problem, we make sure the right network of providers and specialists are in place and we can also update you quickly on the progress and cost of your claim and keep you safe from fraud. However, there are a number of other reasons why we use your personal information; please see below for a more detailed list of how we use your personal information.

We may process your personal information for a number of different purposes and these are set out in more detail below. Under data protection laws we need a reason to use and process your personal information and this is called a legal ground. We have set out below the main reasons why we process your personal information and the applicable circumstances when we will do so. When the personal information we process about you is classed as sensitive personal information (now known as 'Special Categories'), such as details about your health, sexual orientation or criminal offences we must have an additional legal ground for such processing, or where appropriate, we apply a specific exemption for Insurance purposes.

- Processing is necessary in order for us to provide your insurance policy and services, such as assessing your application and setting you up as a policyholder, administering and managing your insurance policy, providing all related services, providing a quote, handling and paying claims and communicating with you. In these circumstances, if you do not provide such information, we will be unable to offer you a policy or process your claim.
- Where we have a legal or regulatory obligation to use such personal information, for example, when our regulators, the Financial Conduct Authority (FCA) and our data protection regulator, the Information Commissioner's Office (ICO) wish us to maintain certain records of any dealings with you.
- Where we need to use your personal information to establish, exercise or defend our legal rights, for example when we are faced with any legal claims or where we want to pursue any legal claims ourselves.
- Where we need to use your personal information for reasons of substantial public interest, such as investigating fraudulent claims and carrying out fraud, credit and anti-money laundering checks.

## Privacy Policy

- Where we have a specific legal exemption to process sensitive personal data for insurance purposes. This exemption applies where we need to process your information as an essential part of the insurance cover, for example health data.
- Where you have provided your consent to our use of your personal information. We will usually only ask for your consent in relation to processing your sensitive personal information (such as health data) or when providing marketing information to you (including information about other products and services). This will be made clear when you provide your personal information. If we ask for your consent we will explain why it is necessary. Without your consent in some circumstances, we may not be able to provide you with cover under the policy or handle claims or you may not be able to benefit from some of our services. Where you provide sensitive personal information about a third party (such as a named driver) we will ask you to confirm that the third party has provided his or her consent for you to act on their behalf.
- Where we have appropriate legitimate business need to use your personal information such as maintaining our business records, developing and improving our products and services, all whilst ensuring that such business need does not interfere with your rights and freedoms and does not cause you any harm.
- Where we need to use your sensitive personal information such as health data because it is necessary for your vital interests, this being a life or death matter.

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**You will find details of the legal grounds we rely on for each use of your personal information below.**

<b>Why we need your personal information</b>	<b>Personal information we may process for the purpose adjacent shall include, but shall not be limited, to the types of information set out below</b>	<b>Legal Grounds for Processing</b>
<p>To review your insurance application and provide you with a quote.</p>	<p>Your contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees).</p> <p>Information about your possessions such as your vehicle, your driving history; any information about your property, past claims, recent damage; information about your business premises (or vehicle).</p> <p>Information about your travel plans, destination, planned activities, dates of travel.</p> <p>Information about the nature of your business and commercial assets.</p> <p>Sensitive personal information including any penalties you may have for driving offences.</p>	<p>Legal ground: such use is necessary in order to provide your insurance policy.</p> <p>Legal ground for sensitive personal information: Where appropriate we apply an exemption for Insurance purposes.</p>
<p>To administer, provide and service your insurance policy,</p>	<p>Your contact details, your age and the age of other person(s) included on the policy (family</p>	<p>Legal grounds: such use is necessary in order to provide your insurance policy and we have a legitimate business</p>



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<b>Why we need your personal information</b>	<b>Personal information we may process for the purpose adjacent shall include, but shall not be limited, to the types of information set out below</b>	<b>Legal Grounds for Processing</b>
<p>assess eligibility for and handling and paying claims.</p>	<p>members, business partners, employees).</p> <p>Information about your possessions such as your vehicle, your driving history; any information about your property, past claims, recent damage; information about your business premises (or vehicle)</p> <p>Information about your travel plans, destination, planned activities, dates of travel.</p> <p>Information about the nature of your business and commercial assets.</p> <p>Sensitive personal information including any penalties you may have for driving offences.</p>	<p>need to use your personal information to administer your insurance policy and handle any claims</p> <p>Legal grounds for sensitive personal information: Where appropriate we apply an exemption for Insurance purposes or you have provided your consent. Please note that, in some cases, if you do not provide your consent, we may not be able to pay claims.</p>
<p>To communicate with you and resolve any complaints you may have.</p>	<p>Your contact details and any information relevant to your policy.</p>	<p>Legal grounds: such use is necessary in order to provide your insurance policy and we have a legitimate business need to resolve any complaints.</p>

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<b>Why we need your personal information</b>	<b>Personal information we may process for the purpose adjacent shall include, but shall not be limited, to the types of information set out below</b>	<b>Legal Grounds for Processing</b>
		Legal grounds for sensitive personal information: such use is necessary for the purposes of establishing, exercising or defending our legal rights, where you have provided your consent or where appropriate we have applied an exemption for Insurance purposes.
To evaluate your application and ability to pay for your policy by instalments.	Your contact details and bank account details	Legal ground: such use is necessary in order to provide your insurance policy
To prevent, detect and investigate fraud. More information on how we use your information to do this is available under. Detail Section 1 below.  Technology may include voice analytics.	Your contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees).  Information about your possessions such as your vehicle, your driving history; any information about your property, past claims, recent damage; information about your business premises (or vehicle).	Legal grounds: such use is necessary in order to provide your insurance policy and we have a legitimate business need to prevent fraud.  Legal ground for sensitive personal information: we need to use your personal information for reasons of substantial public interest to prevent and detect fraud.

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Why we need your personal information	Personal information we may process for the purpose adjacent shall include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
	<p>Information about your travel plans, destination, planned activities, dates of travel.</p> <p>Information about the nature of your business and commercial assets.</p> <p>Information available in the public domain or on social media.</p> <p>Sensitive personal information including any penalties you may have for driving offences.</p>	
<p>For the purposes of debt recovery (where you have not paid for your insurance policy or broking or other fees and charges)</p>	<p>Information about you, your name, address, email address, contact details and bank account details</p>	<p>Legal ground: we have a legitimate business need to recover any debt.</p>
<p>For our own management information purposes including; managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g. tax or legal advice). We also undertake measures to secure our system and to ensure the effective operation of our systems.</p>	<p>Your contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees).</p> <p>Information about your possessions such as your vehicle, your driving history; any information about your property, past claims, recent damage; information about your business premises (or vehicle)</p>	<p>Legal grounds: we have a legitimate business need to use your personal information to understand our business and monitor performance and maintain appropriate records, to protect the security of our systems</p> <p>Legal ground for sensitive personal information: Where appropriate we apply an exemption for Insurance purposes.</p>

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<b>Why we need your personal information</b>	<b>Personal information we may process for the purpose adjacent shall include, but shall not be limited, to the types of information set out below</b>	<b>Legal Grounds for Processing</b>
<p>For analytical purposes and to improve our products and services.</p>	<p>Your contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees).</p> <p>Information about your possessions such as your vehicle, your driving history; any information about your property, past claims, recent damage; information about your business premises (or vehicle)</p> <p>Information about your travel plans, destination, planned activities, dates of travel.</p> <p>Information about the nature of your business and commercial assets.</p> <p>Sensitive personal information including any penalties you may have for driving offences.</p>	<p>Legal ground: we have a legitimate business need to use your personal information for services improvement</p> <p>Legal ground for sensitive personal information: Where appropriate we apply an exemption for Insurance purposes.</p>

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Why we need your personal information	Personal information we may process for the purpose adjacent shall include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
Complying with our legal or regulatory obligations	Details about you, other related parties, your product or service, depending on the nature of the obligation	Legal ground: such use is necessary for us to comply with our legal or regulatory obligations
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers); technology may include voice analytics	Details about you and other related parties, your product or service having been discussed with you or your representative during a telephone conversation with us.	<p>Legal ground: we have a legitimate business need to provide secure and quality services</p> <p>Legal ground for sensitive personal information: Where appropriate we apply an exemption for Insurance purposes.</p>
Providing marketing information to you (including information about other products) in accordance with preferences you have expressed	Your name, contact details, marketing preference	Legal ground: you have provided your consent

## Privacy Policy

### **Detail Section 1 – How does Waterfront use your information to prevent, detect and investigate fraud?**

When you take out a car insurance policy, your insurer will add your policy details to the Motor Insurance Database ("MID"), run by the Motor Insurers' Information Centre ("MIIC"). MID data may be used by the Driver and Vehicle Licensing Agency ("DVLA") and the Driver and Vehicle Licensing Northern Ireland for the purpose of electronic vehicle licensing and by the police for the purposes of establishing whether a driver's use of a vehicle is likely to be covered by a motor insurance policy and for preventing and detecting crime. If you are involved in an accident, whether in the UK or abroad, other UK insurers, the Motor Insurers' Bureau and MIIC may search the MID to obtain relevant policy information.

Persons pursuing a claim in respect of a road traffic accident (including citizens of other EU countries) may be entitled to access relevant information held about you on the MID. You can find out more about this from us, or from the [Motor Insurance Bureau](#).

### 5. Who do we share your personal information with?

We might share your personal information with companies and other third parties outside of Waterfront. For further details of disclosures, please see below. We won't share any of your personal information other than for the purposes described in this Privacy Policy. If we share anything, it will be kept strictly confidential and will only be used for reasons that we've described. We will never sell your data.

### Who might we disclose your personal information to?

#### Disclosures to third parties

We may disclose your information to the third parties listed below for the purposes described in this Privacy Policy. This might include:

- Your relatives or guardians (on your behalf where you are incapacitated or unable) or other people or organisations associated with you such as your insurance broker or your lawyer
- Where you have named an alternative contact (such as a relative) to speak with us on your behalf. Once you have told us your alternative contact, this person will be able to discuss all aspects of your policy (including claims and cancellation) with us and make changes on your behalf.
- Your Road Relay Agent, such as the AA or Greenflag
- An insurer recommended garage or panel beater or your designated garage or panel beater
- Our insurance partners such as other brokers, other insurers, reinsurers or other companies who act as insured distributors
- Other third parties who assist in the administration of insurance policies such as another Insurance Company if there has been an accident which requires a claim to or from that Insurance Company
- We may share the personal information of any persons named on the policy with third parties to obtain information which may be used by your insurer to inform its risk selection, pricing and underwriting decisions
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers
- The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- Motor Insurers' Information Centre and the DVLA
- Passing information to a third party for the purpose of validating your No Claims Discount (NCD) entitlement and this may be made available to other insurers
- Also to other companies or insurers for the purpose of validating your NCD entitlement
- Our third party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers and tax advisers

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- Other suppliers, providers of goods and services associated with this insurance and/or to enable us to deal with any claims you make
- Financial organisations and advisers
- Central Government
- The Financial Ombudsman Service and regulatory authorities such as the Financial Conduct Authority and the Information Commissioner's Office
- Overseas assistance companies
- Loss Adjusters
- Car Hire Companies
- House Builders or other House Repairers
- Emergency Assistance Companies
- Your healthcare practitioner
- Debt collection agencies
- Credit reference agencies
- Selected third parties in connection with the sale, transfer or disposal of our business

Disclosure of your personal information to a third party will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also disclose your personal information to other third parties where:

- we are required or permitted to do so by law or by regulatory bodies such as where there is a court order, statutory obligation or Prudential Regulatory Authority/ Financial Conduct Authority or Information Commissioners Office request; or
- we believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

Occasionally there may also be some circumstances where we are required to transfer your personal information outside of the EEA and we shall rely on the basis of processing it for being necessary for the performance of your contract; for example, where you have a travel insurance policy and we need to contact you when you are on holiday.



## 6. How long do we keep records for?

In most cases, we only keep your information for as long as the regulations say we have to. This is usually between three and ten years after our relationship with you ends but it will vary depending on what data we hold, why we hold it and what we're obliged to do by the regulator or the law.

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal and regulatory obligations. The time period we retain your personal information for will differ depending on the nature of the personal information and what we do with it. How long we keep personal information is primarily determined by our regulatory obligations. We typically keep information and policy and claims records for up to 7 years from the end of our relationship with you. In some cases, such as if there is a dispute or a legal action we may be required to keep personal information for longer. Long-term insurance products such as employers liability insurance, is kept for an extended period.

### 7. Your Rights

You can ask us to do various things with your personal information. For example, at any time you can ask us for a copy of your personal information, ask us to correct mistakes, change the way we use your information, or even delete it. We'll either do what you've asked, or explain why we can't - usually because of a legal or regulatory issue.

For further details about your rights please see below

You have the following rights in relation to our use of your personal information.

#### **The right to access your personal information**

You are entitled to a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests. Your personal information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible.

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

We take reasonable steps to ensure that the personal information we hold about you is accurate and complete. However, if you do not believe this is the case, please contact us by using the details shown in your documentation and you can ask us to update or amend it.

#### **The right to erasure:**

In certain circumstances, you have the right to ask us to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors, for example according to the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.

#### **Right to restriction of processing:**

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

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### **Right to data portability:**

In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice. Once transferred, the other party will be responsible for looking after your personal information.

### **Right to object to direct marketing:**

You can ask us to stop sending you marketing messages at any time. Please see the Marketing section for more information.

### **Right not to be subject to automated-decision making:**

Some of our decisions are made automatically by inputting your personal information into a system or computer and the decision is calculated using certain automatic processes rather than our employees making those decisions. We make automated decisions in the following situations:

- **Deciding your premium**

We use the personal information that you and others provide to us about you your family, property, where you live your policy claims history, and other non-personal information such as garage repair costs or hospital costs to determine your premium and eligibility. The price also depends on what options you have chosen to purchase. For example, if you live in London you will pay more than if you live in Yorkshire because fire insurance costs, on average, are higher in London than Yorkshire. We also use information about how long you have been a customer, how many claims you have made and how much you pay in premiums to determine what terms you are offered at renewal.

- **Fraud prevention**

Insurers' uses automated anti-fraud filters that check against lists of people known to have undertaken fraudulent transactions and will reject those applicants on the basis they are likely to defraud the company.

- **Assessing your application**

Insurers may use scoring methods to assess your application, to verify your identity and determine finance charges.

Examples of information used by insurer systems to do this include: your age, your postcode your lifestyle (e.g. do you smoke cigarettes) and your medical history. If you do not consent to us processing sensitive information in this way, we may be unable to assess your application or offer you cover, alternatively we may only be able to offer you styles of policy that do not require us to have that information at the start.

## **Privacy Policy**

You have a right not to be subject to automated decision-making in the circumstances described above and where automated decision-making used in the assessment of your application or fraud prevention, you can contact us to request that any declined decision is reconsidered. If you want to opt out of automatic decision-making, let us know, although in some circumstances it may mean we can't offer you a quote or policy as some automated decisions are necessary to provide your insurance policy.

### **The right to withdraw consent:**

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information. Please note in some cases we may not be able to process your insurance if you withdraw your consent.

### **The right to lodge a complaint**

You have a right to complain to the ICO at any time if you object to the way in which we use your personal information. More information can be found on the Information Commissioner's Office website: <https://ico.org.uk/>

You can make any of the requests set out above using the contact details provided to you in your policy documentation. Please note that in some cases we may not be able to comply with your request for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.

In some circumstances exercising some of these rights will mean we are unable to continue providing you with cover under your insurance policy and may therefore result in the cancellation of the policy. You will therefore lose the right to bring any claim or receive any benefit under the policy, including in relation to any event that occurred before you exercised your right, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your policy is cancelled.

## **8. Marketing**

You're in control of how we use your information for marketing. We will only contact you if you've agreed it's okay. Then, we might use your information to tell you about products and services that could interest you. We will never sell your data to a third party.

We may inform you of other products and services that may be of interest to you or members of your family, but we will only do this where you have provided your consent. You can always change your mind by contacting us using the details shown in your documentation and telling us you no longer wish to be contacted.

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving.

Please note that we may retain any data provided to us on our website for a limited period, even if you do not complete your quote. The information may be used to enquire as to why you did not complete your quote or for us to better understand your needs but only if you have agreed for us to contact you.

## **Privacy Policy**

### **9. Download a copy of the Privacy Policy**

To view a digital copy of this Privacy Policy online, please visit:

[www.waterfrontinsurancebrokers.co.uk/privacy-policy.html](http://www.waterfrontinsurancebrokers.co.uk/privacy-policy.html)

**Version:** 01 March 2018

## 10. Contact Details of the Data Protection Officer

If you wish to contact the Data Protection Officer the details are below:

**The Data Protection Officer :**

Waterfront Insurance Brokers Ltd  
International House  
Chapel Hill  
Huddersfield  
HD1 3EE

email address: [smanning@waterfrontinsurancebrokers.co.uk](mailto:smanning@waterfrontinsurancebrokers.co.uk)

If you would like to contact the UK's Information Commissioner's Officer direct, please write to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Telephone: 0303 123 1113 (local rate) or 01625 545 745(national rate) or email <https://ico.org.uk/global/contact-us/email/>

### **11. Waterfront's data privacy declaration**

Your personal information can help us give you a better, more personalised service. But looking after that data is a big responsibility. We take our responsibilities seriously, so we've introduced internationally recognised data privacy rules to protect you. We keep your data safe, confidential and will never sell it. And, if you ask us to, we'll tell you exactly what information we have so you can be sure it's up-to-date and accurate.

#### **Waterfront's Data Privacy Declaration**

Our mission is to help you, our customers, live your lives with more peace of mind by protecting your family, your property and your assets against risks. Doing so involves the collection of data so that we understand the nature of these risks that we cover for you, and that we may provide you with the right products and services to meet your needs.

Today's world is one in which the amount of available data is growing exponentially. Ultimately, this allows us to enhance your experience through tailor-made protection, more relevant information and simplified, efficient procedures.

We believe that protecting your personal information is essential when seizing these opportunities. This is why we considered it important to share with you the principles that will guide us with regard to the treatment of personal information.

#### **11.1 Our Commitment to Safeguard Personal information**

We know that respecting the confidentiality of personal information is critical to preserving your trust and therefore have developed security procedures and we use a range of organisational and technical security measures designed to protect your personal information from unauthorized use or disclosure.

#### **11.2 Our Commitment in Respect to the Use of Personal information**

We provide you with up-to-date prevention and protection solutions, through an in-depth and well-informed understanding of the risks you face. To do this, we collect your personal information and use it in compliance with data protection laws.

We have in place procedures and contractual arrangements designed to ensure that all employees, sales representatives, advisers and service providers keep client files confidential.

Our customers often entrust us with sensitive personal information in connection with insurance coverage we provide to them - both at the time of their initial subscription and during the term of their coverage. We view ourselves as custodians of this data and do not sell it to third parties. We may market products jointly with other companies in cases where we believe there is a unique or compelling value proposition for our customers.



## **Privacy Policy**

### **11.3 Our Commitment to Dialogue and Transparency**

As a leading international insurance group, we play a proactive role in public policy and regulatory debates around personal information protection.

These are our continuing commitments to you. We will keep pace with future developments surrounding data privacy to adapt them to your evolving needs.