

Premia Managing Agency Limited Privacy Notice

1. Who we are

We are Premia Managing Agency Limited (“**PMAL**”). Our company number is 09147885 and our registered office address is The Minster Building, 21 Mincing Lane, London, England, EC3R 7AG.

PMAL is a registered Lloyd’s managing agent which was acquired by Premia from the Charles Taylor group in March 2020. Premia is a Bermuda based legacy reinsurance group with operations in the USA, Bermuda, UK and EU. You can find further information about the Premia group and PMAL [here](#).

PMAL manages one Lloyd’s Syndicate, [Syndicate 1884](#), a syndicate closed to new live business and which is now dedicated to providing risk-transfer and run-off solutions for other Lloyd’s syndicates and capital providers.

2. About this privacy notice

This is PMAL's general privacy notice which sets out how PMAL processes personal data.

Please note that this privacy notice may be updated from time to time. Any changes we make to this privacy notice in the future will be posted on our website.

This privacy notice was last updated in January 2021.

3. Our responsibility to you and our privacy principles

We process your personal information in our capacity as a controller. This means that we are responsible for ensuring that we comply with relevant data protection laws when processing your personal information.

When we collect and process your personal data, we will process it in accordance with the following privacy principles:

- personal data you provide will be processed fairly, lawfully and in a transparent manner;
- personal data you provide will be collected for a specific purpose and not processed in a way which is incompatible with the purpose for which we collected it;
- your personal data will be adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed;
- your personal data will be kept accurate and, where necessary up to date;
- your personal data will be kept no longer than is necessary for the purpose for which the personal data is collected and processed;
- we will take appropriate steps to keep your personal data secure;
- your personal data will be processed in accordance with your rights under applicable data protection law;
- we will only transfer your personal data to a country or an international organisation outside of the UK or the European Economic Area (“**EEA**”), where we have taken the required steps to ensure that your personal data is protected. Such steps may include placing the party to whom we are transferring data under contractual obligations to protect that data to adequate standards.

4. What is personal data?

‘Personal data’ means any information which identifies you as an individual. It may include your name but it may also be other information such as your date of birth, nationality and gender which when combined

identify you. This information may be collected in a variety of ways, including electronically, in paper form, by telephone or in person.

There are different types of personal data. The most important types for you to know about are:

- special categories of personal data: these categories of personal data often have additional protection under data protection laws around the world. These categories include information about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership, your genetic data and biometric data, and information concerning your sex life or sexual orientation; and
- criminal convictions personal data: this is information relating to your criminal convictions and offences. Local data protection laws may restrict the way in which we can use this information when compared to, for example, your name and address.

5. What personal data do we collect about you?

PMAL will almost always obtain your data from either you directly or our clients, who include individuals, businesses, trusts, funds and (re)insurance companies. Our clients will in turn will have obtained it from you or your employer or family member or a company close to you in relation to a contract, insurance policy or employment policy.

If you are a broker or business partner, we may also collect your personal data from our day to day business activities with you, business referrals and your attendance at events.

This information may include details such as:

- your name, address and contact details;
- your date of birth;
- information about your insurance policies, contracts and claims in which you may have been or are currently involved;
- financial information and credit and anti-fraud data; and
- special category personal data including information about your health and medical history, race, ethnicity, sex life or sexual orientation, religious beliefs, trade union membership, genetic and biometric data, political opinions and any other physical or mental health details; and
- information relating to your criminal convictions and offences.

6. How do we use your personal data and what are our legal bases for processing your personal data?

Under data protection law, we are required to tell you why we use your personal data and to establish a 'legal basis' for processing your personal data. Further information on these points is set out in the table below.

Purpose	Legal basis
<p>Evaluating risks to be covered and underwriting</p> <p>We may use personal data when evaluating the risks to be covered in the context of underwriting a (re)insurance policy.</p> <p>In some cases, this information will include special categories of personal data and criminal convictions data.</p>	<p>For all information – legitimate interests.</p> <p>We have a legitimate interest in using your information where this is necessary or appropriate to determine the</p>

	<p>risk profile of the liability we take on.</p> <p>For special category and criminal convictions data – necessary for an insurance purpose.</p>
<p>Know your client, supplier and counterparty and other legal obligations, in addition to fraud investigation and recovery</p> <p>We obtain information about our clients, suppliers and counterparties and their representatives and beneficial owners and others to help us comply with legislation on money laundering, terrorist financing, and sanctions. We may also use your personal data in the context of fraud investigation and recovery.</p> <p>We also collect and disclose personal data under applicable legislation and under orders from courts and regulators. Our disclosures will be to those bodies and persons who are entitled to receive the required information.</p> <p>In some cases, this information will include special categories of personal data and criminal convictions data.</p>	<p>For all information – compliance with a legal obligation.</p> <p>Where applicable, we will also rely on the 'performance of a contract' legal basis for processing.</p> <p>For special category and criminal convictions data – preventing or detecting unlawful acts, and suspicion of terrorist financing or money laundering.</p>
<p>Performing contracts of insurance, including communicating with you and with third parties in the course of operating our business</p> <p>We use personal data when communicating with you in the course of operating our business and when managing insurance claims.</p> <p>In some cases, this information will include special categories of personal data and criminal convictions data.</p>	<p>For all information – legitimate interests.</p> <p>We have a legitimate interest in using your information where this is necessary or appropriate to perform a contract of insurance or to communicate with you and with third parties in the course of operating our business.</p> <p>Where applicable, we will also rely on the 'performance of a contract' legal basis for processing.</p> <p>For special category and criminal convictions data – necessary for an insurance purpose.</p>
<p>Claims and fund handling, claims and fund management and claims administration</p> <p>We use personal data when managing insurance claims and associated funds. This may include corresponding with beneficiaries, claimants, experts and witnesses.</p>	<p>For all information – legitimate interests.</p> <p>We have a legitimate interest in using your information where this is necessary or</p>

<p>In some cases, this information will include special categories of personal data and criminal convictions data.</p>	<p>appropriate to assess and manage claims.</p> <p>For special category and criminal convictions data – necessary for an insurance purpose.</p>
<p>Marketing and improving and tailoring our services and website</p> <p>We may use your personal data to carry out analysis and market research and to carry out marketing activities, including online advertising.</p> <p>We may also use your personal data to provide tailored services to clients and to improve our website and services more generally.</p> <p>We do not generally look to collect special categories of personal data and criminal convictions data for this purpose.</p>	<p>Legitimate interests.</p> <p>We have a legitimate interest in carrying out marketing activities to promote our business and in improving and tailoring our services and website.</p>
<p>Administrative and management purposes</p> <p>We may use your personal data for our own administrative and management purposes.</p> <p>We do not generally look to collect special categories of personal data and criminal convictions data for this purpose.</p>	<p>Legitimate interests.</p> <p>We have a legitimate interest in carrying out our own administrative and management functions.</p>
<p>Service providers</p> <p>We collect information about you in connection with your provision of services to us or your position as a representative or worker of a provider of services to us.</p> <p>We do not generally look to collect special categories of personal data and criminal convictions data for this purpose, other than where we are required to do so to meet our legal obligations (see 'Know your client, supplier and counterparty and other legal obligations' above).</p>	<p>Legitimate interests.</p> <p>We have a legitimate interest in contacting and dealing with individuals involved in providing services to us.</p>
<p>Visitors to our offices</p> <p>We have security measures in place at our offices, which include building access controls and may include CCTV. Images captured by CCTV are securely stored and only accessed on a need to know basis – for example, to look into an incident. CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft).</p> <p>We require visitors to our offices to sign in at reception and we keep a record of visitors for a short period of time. Our visitor records are</p>	<p>Legitimate interests.</p> <p>We have a legitimate interest in making sure our offices, and the people that visit and work at our offices, are safe and secure.</p>

<p>securely stored and only accessible on a need to know basis – for example, to look into an incident.</p> <p>We do not generally look to collect special categories of personal data and criminal convictions data for this purpose.</p>	
<p>Establishing our legal position</p> <p>We may use your personal data, including sharing it with our legal advisers, when looking to establish our legal position. This includes exercising our legal rights and defending legal claims.</p> <p>In some cases, this information will include special categories of personal data and criminal convictions data.</p>	<p>For all information – legitimate interests.</p> <p>We have a legitimate interest in understanding and establishing our legal rights and obligations.</p> <p>For special category and criminal convictions data – the establishment, exercise or defence of legal claims.</p>

Where we rely on our legitimate interests, we will always balance them against the rights and freedoms of the people whose personal data we process. Where their rights override our legitimate interests and there are no other legal bases for processing we will cease to process personal data.

Please note that where the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, and you do not provide us with the personal data required, we may not be able to provide the relevant services or enter into a contract with you, as applicable.

We do not generally process your personal data based on your consent (as we can usually rely on another legal basis). However, in certain circumstances, we may need your consent to process certain categories of information about you (including sensitive details such as information about your health and any criminal convictions you may have). Where we need your consent, we will ask you for it separately. You do not have to give your consent and you may withdraw your consent at any time. However, if you do not give your consent, or you withdraw your consent, this may affect our ability to provide the insurance cover from which you benefit and may prevent us from providing cover for you or handling your claims.

To withdraw your consent (where applicable) please contact the Head of Compliance at the following email address: julia.davis@premiare.com or pmalcompliance@premiare.uk.

7. Who do we share your personal data with?

From time to time, we may need to disclose personal data to third parties. Sometimes, these will be companies who process on our behalf and only act upon our instructions. We may also share your personal data with individuals and companies such as consultants; doctors; experts; lawyers; and other professionals within or connected to the insurance industry.

Please note that 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 on the following link:

https://www.lmalloyds.com/LMA/News/LMA_bulletins/LMA_Bulletin_2013/LMA17_038_MS.aspx.

It is possible that some personal data may also be shared with Premia. For that reason Premia has entered into a Data Protection Agreement with PMAL to protect any transfers of personal data to Premia in Bermuda. This Agreement incorporates the Standard Contractual Clauses approved by the European Commission and therefore provides you with equivalent protection of your personal data to that which you enjoy in the UK.

8. Automated decision making

We do not use profiling (where an electronic system uses personal information to try and predict something about you) or automated decision making (where an electronic system uses personal information to make a decision about you without human intervention).

9. How long will we keep your information?

We will keep your personal data only for as long as it is necessary for the purpose for which they were collected, in accordance with our Retention Schedule at Appendix 1 to the PMAL Data Protection Policy.

In relation to insurance policies, this means that we will generally keep your information for seven years after the insurance policy expires or the last activity connected with the policy.

10. Cross border transfers of your personal data

The international nature of our business means that your personal data may well be transferred across national boundaries, including, potentially, to countries that do not require organisations by law to look after your personal data in the way in which you have come to expect in your own country.

Where we transfer your personal data across national boundaries, we will protect your personal data by ensuring that those transfers are made in compliance with all relevant data protection laws. Generally, this means where we transfer your personal data to a third party that is located in a country which does not have adequate privacy protection, we will put in place a contract with the third party that includes the standard international data transfer contractual terms approved by the UK Information Commissioner. This provides you with equivalent protection of your personal data to that which you enjoy in the UK.

We will keep records of where your data has been sent outside of the UK and you can have access to these records if you wish.

If you would like further details of how your personal data is protected when transferred from one country to another then please email us at julia.davis@premiare.com or pmalcompliance@premiare.uk.

11. Your personal data protection rights

Under certain conditions, you may have the right to require us to:

- provide you with further details on the use we make of your personal data;
- provide you with a copy of the personal data we hold about you;
- update any inaccuracies in the personal data we hold about you;
- delete any of your personal data that we no longer have a lawful ground to use;
- where processing is based on consent, stop that particular processing by withdrawing your consent;
- object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights;
- restrict how we use your personal data whilst a complaint is being investigated; or
- transfer your personal data to a third party in a standardised machine-readable format.

In certain circumstances, we may need to restrict your 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).

We are obliged to keep your personal data accurate and up to date. Please help us to do this by advising us of any changes to your personal data.

If you are not satisfied with our use of your personal data or our response to any request by you to exercise your rights, or if you think that we have breached any relevant data protection laws, then you have the right to complain to the authority that supervises our processing of your personal data, the UK data protection regulator, the Information Commissioner's Office. Details about the ICO can be found at <https://ico.org.uk>.

12. How to contact us

If you have any questions or concerns about how we process your personal data, or wish to exercise any of your data protection rights, you can contact the Head of Compliance at julia.davis@premiare.com or pmalcompliance@premiare.uk.