

DATA PROTECTION NOTICE – CUSTOMERS

This Data Protection Notice contains the information You need in order to understand how Your personal data is used by the Insurer and Intermediaries. This information is also available at www.watfordre.com and <https://eldoninsurance.co.uk/>. If you would like additional detail please contact us using the details in Section 11 below.

In this Data Protection Notice:

Insurer refers to Watford Insurance Company Europe Limited.

Intermediaries refers to Somerset Bridge Limited and its affiliates, who arrange insurance cover, as well as offer advice and handle claims.

You/Your refers to the policyholder or any other person insured or potentially insured by the contract or potential contract. It is the responsibility of the person seeking the quotation or arranging the insurance to convey the information in this Data Protection Notice to any other such person.

In order to manage our business and provide our services to customers, the Insurer and Intermediaries (**we, us, our**) collect a certain amount of personal data. "Personal data" means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information.

This Data Protection Notice sets out the basis on which we gather, use, disclose and process any personal data we collect from You, or that You provide to us. We will use Your personal data only for the purposes and in the manner set forth below which describes the steps we take to ensure our processing of Your personal data is in compliance with the General Data Protection Regulation ((EU) 2016/679) (the **GDPR**) and any implementing legislation.

Please read the following carefully to understand our use of Your personal data.

Your Right to Object – Please note that You have a right to object to the processing of Your personal data where that processing is carried out for our legitimate interests.

1. What Personal Data we May Collect about You?

In order to provide insurance quotes, insurance policies and deal with any claims or complaints, we need to collect and process personal data about You. If You do not provide the information we need, we may not be able to offer You a quote or provide our services to You. The types of personal data that are processed may include:

Category	Types of Data Collected
Individual details	Name, address (including proof of address), other contact details such as email address and phone number, gender, marital status, date and place of birth, nationality, marketing preferences, IP address, bank account details or payment card details, vehicle details, relevant

	criminal convictions, penalty points, employer, job title and family member details, including their relationship to You.
Identification details	Identification numbers issued by government bodies or agencies, including Your driving license number and photographs identifying You.
Credit and anti-fraud data	Credit and anti-fraud data such as credit history, credit score, sanctions and criminal offences, and information from various anti-fraud databases relating to You.
Special categories of personal data and criminal convictions data	Certain categories of personal data which have additional protection under EU data protection law. These categories are health and criminal convictions.
Claims information	Information about previous and current claims, (including other unrelated insurances), which may include data relating to Your health (e.g., injuries and relevant pre-existing conditions), relevant criminal convictions, or other special categories of personal data mentioned above.
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, relevant criminal convictions, or other special categories of personal data.

2. The Purposes of, and Legal Basis for, the Processing of Your Personal Data

We hold, disclose and process Your personal data in order to provide you with insurance cover in accordance with our contract and to take steps at Your request prior to entering into a contract. This includes using Your personal data for:

- Quotation and Inception;
- Policy Administration;
- Claims Processing; and
- Renewals

We may also use Your personal data where:

- a) it is necessary to comply with our legal and regulatory obligations (for example, complying with reporting obligations to the Financial Conduct Authority, the Prudential Regulatory Authority or other applicable regulatory authorities);
- b) it is necessary to support our legitimate interests in managing our business, including in connection with (i) the administration of Your policy, (ii) improving our insurance products and services, (iii) prevention and detection of crime, (iv) general risk modelling, (v) transferring books of business, company sales and reorganizations; (vi) analytics, provided in each such instance, they are not overridden by Your interests and rights; and (vii) obtaining reinsurance; and/or
- c) You have consented to processing Your information in such a way.

3. Criminal Convictions

The Insurer and Intermediaries may hold, use, disclose and process personal data relating to relevant criminal convictions and offences for the purposes identified above, where necessary to comply with our legal and regulatory obligations, or where necessary to support our legitimate interests. We will only carry out such processing where it is authorised by European Union (EU) or Member State law.

4. Special Categories of Personal Data

We hold, use, disclose and process special categories of personal data (e.g., Your health data) where:

- You have given us Your explicit consent;
- the processing is necessary to protect Your, or another's vital interest;
- You have manifestly made Your personal data publically available;
- the processing is necessary for the establishment, exercise or defence of legal claims; or
- necessary for reasons of substantial public interest on the basis of law.

5. Who We Share Your Information with

In order to provide our services and to comply with legal obligations imposed on us, it may be necessary from time to time for us to disclose Your personal data to third parties, including without limitation to the following:

- with the Insurer group, and our agents and third parties who provide services to us, Your Intermediary and other insurers (either directly or via those acting for the Insurer) to help us administer our products and services;
- with regulatory bodies and law enforcement bodies (where we are required to do so to comply with a relevant legal and regulatory obligation);
- legal, financial, medical and other professional advisors;
- with the Insurer's affiliates assisting with the operations of the Insurer; and
- with the Insurer's reinsurers, who provide reinsurance services to the Insurer. Reinsurers will use Your data to decide whether to provide reinsurance cover, assess and deal with reinsurance claims and to meet legal obligations. Reinsurers will keep Your data for the period necessary for these purposes and may need to disclose it to other companies within their group, their agents and third party service providers, law enforcement and regulatory bodies. To the extent the reinsurer is a member of the Insurer group and is subject to the GDPR, the reinsurer will process Your personal data where in its legitimate interests to do so. For further information please visit www.WatfordRe.com.

6. Transfer of Personal Data outside the EEA

The personal data we collect from You may be transferred to, and stored at a destination outside of the European Economic Area (**EEA**) for purposes described above. These countries may not provide an adequate level of protection in relation to the processing of Your personal data. Due to the global nature of our business, Your personal data may be disclosed to members of our group outside of the EEA, including in particular Switzerland, Bermuda and the U.S.

However, to ensure that Your personal data receives an adequate level of protection we have put in place the following appropriate safeguards in place to protect the privacy and integrity of such personal data:

- **Model Clauses:** standard clauses in our contracts with our above listed third parties to ensure that any personal data leaving the EEA will be transferred in compliance with EU data-protection law. Copies of our current Model Clauses are available on request by using the Insurers' contact details listed in Section 11; and

- **EU/Swiss-U.S. Privacy Shield:** an agreement between the EU and the Governments of Switzerland and the US concerning the treatment of data concerning EU citizens. Some of our third parties are certified under the EU/Swiss-U.S. Privacy Shield.

7. How Long we Keep Your Personal Data

We are required to ensure that Your personal data, as a policyholder, is accurate and maintained in a secure environment for a period of time no longer than necessary for the purposes for which we are processing Your personal data.

Information submitted for a quotation where you did not purchase our product may be retained by us for a period of up to 15 months from the date of the quotation. Where You purchase our insurance product, information will be held for the duration of Your insurance cover and a period of at least 23 years after the end of our relationship. We keep information after our relationship ends in order to comply with applicable laws and regulations and for use in connection with any legal claims.

8. Automated Decision Making

You have a right not to be subjected to decisions based solely on automated processing, including profiling, which produce legal effects concerning You or similarly significantly affects You. However in certain circumstances we are entitled to make decisions based on solely automated decision-making and profiling. These cases are restricted to situations where the decision is necessary for entering into a contract, or for performing that contract with You (i.e., Your policy of insurance or quote), where it is authorised by law or where You have provided Your explicit consent. Where we base a decision on solely automated decision-making You will always be entitled to have a person review the decision so that You can contest it and put Your point of view and circumstances forward.

9. Your Data Rights

You have several rights in relation to Your personal data. You have a right to:

- access a copy of Your personal data held by us;
- request rectification of Your personal data if it is inaccurate or incomplete;
- request erasure of Your personal data in certain circumstances;
- restrict our use of Your personal data in certain circumstances;
- move (or port) personal data which You have given us to process on the basis of Your consent or for automated processing;
- object to the processing of Your data where our legal basis for processing Your data is our legitimate interests; and
- not to be subject to a decision based on automated processing, including profiling which has legal or similar significant affects.

However, these rights may not be exercised in certain circumstances, such as when the processing of Your data is necessary to comply with a legal obligation or for the exercise or defence of legal claims. If You wish to exercise any of Your rights in this regard please contact us using the details in Section 11. We will respond to Your request in writing, or orally if requested, as soon as practicable and in any event not more than one month after receipt of Your request. In exceptional cases, we may extend this period by two

months, and if we do this we will tell you why. We may request proof of identification to verify Your request.

10. Consequences of Failure to Provide Information

If the Insurer or the Intermediaries cannot collect information requested from You, it may make it difficult, impossible, or unlawful for us to give You advice on, provide You with, and administer our insurance products.

If the Insurer or the Intermediaries ask for information and You do not wish to give it to us, or if You wish to withdraw consent to the use of Your personal data, the Insurer or the Intermediaries will explain the consequences based on the specific information concerned including whether it is a legal or contractual requirement that we use such data. If You have any queries in respect of the consequences of not providing information or withdrawing Your consent, please contact the Insurer and Intermediaries using the details in Section 11.

11. Further Information

If You require any further information about how we use Your data or if You want to exercise any of Your rights under this Data Protection Notice, please contact the Insurer and Intermediaries as listed below:

Insurer	Intermediaries
<p>Data Protection Officer Watford Holdings, Ltd. 100 Pitts Bay Road, 1st Floor Hamilton, HM-08 Bermuda Tel: +1-441-278-3454 Email: WatfordDPO@WatfordHoldings.com</p> <p>Watford Insurance Company Europe Limited Data Protection Officer PO Box 1338 Grand Ocean Plaza, First Floor Ocean Village Gibraltar GX11 1AA Email: WatfordDPO@WatfordHoldings.com Phone: +1-441-278-3454</p> <p>Watford Insurance Company Europe Limited is an insurance company licensed by the Financial Services Commission in Gibraltar (incorporation number 112869).</p>	<p>Somerset Bridge Limited is an Appointed Representative of Eldon Insurance Services Limited. Eldon Insurance Services Limited is authorised and regulated by the Financial Conduct Authority.</p> <p>Contact: Group Data Protection Officer, Somerset Bridge Limited; or</p> <p>Group Data Protection Officer, Eldon Insurance Services Limited</p> <p>Address: Lysander House Catbrain Lane Cribbs Causeway Bristol BS10 7TQ Telephone: 0344 840 6302 Email: enquiries@eldoninsurance.co.uk</p>

The Insurer and the Intermediaries encourage You to review this Data Protection Notice and explore the websites below where additional information about the processing of Your personal data may be found:

- <https://eldoninsurance.co.uk/wp-content/uploads/2018/05/Eldon-Privacy-Notice.pdf>

- www.watfordre.com

If You wish to receive a copy of website information of the Insurer and/or the Intermediaries by post, please contact the Insurer and Intermediaries as listed above.

12. Your Right to Complain to the ICO and the Gibraltar Regulatory Authority

If You are not satisfied with our use of Your personal data or our response to any request by You to exercise any of Your rights in Section 9, You have the right to lodge a complaint with the Information Commissioner's Office and the Gibraltar Regulatory Authority. Please see below contact details:

England	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Phone: 0303 123 1113 (local rate) or 01625 545 745 (national rate) Email: casework@ico.org.uk
Scotland	Information Commissioner's Office 45 Melville Street Edinburgh EH3 7HL Phone: 0303 123 1115 Email: scotland@ico.org.uk
Wales	Information Commissioner's Office 2 nd Floor Churchill House Churchill way Cardiff CF10 2HH Phone: 029 2067 8400 Email: wales@ico.org.uk
Northern Ireland	Information Commissioner's Office 3 rd Floor 14 Cromac Place Belfast BT7 2JB Phone: 0303 123 1114 (local rate) or 028 9027 8757 (national rate) Email: ni@ico.org.uk
Gibraltar	Data Protection Commissioner, Gibraltar Regulatory Authority 2 nd Floor Eurotowers 4 1 Europort Road Gibraltar Phone: 350 20074636 Email: info@gra.gi

13. Important Information about This Data Protection Notice.

Each Insurer and Intermediary providing this Data Protection Notice to You is a separate legal entity and separate data controller in respect of Your personal data.