



Client Privacy Notice

This Privacy Notice covers the information practices of Argus Group Holdings Limited and its wholly owned subsidiaries and, for the purposes of this specific notice, in particular Island Insurance Brokers Limited (the “Company”, “us” “we”) (registered number: C10536) a data controller and whose registered office is at Insurance House, Psaila Street, Birkirkara, Malta BKR 9078.

This Privacy Notice sets out how we collect and process your personal data. This Privacy Notice also provides certain information that is legally required and lists your rights in relation to your personal data.

This Privacy Notice relates to personal information that identifies you as a natural person (whether you are an actual or potential customer, an individual who browses our website or an individual outside our organisation with whom we interact). We refer to this information throughout this Privacy Notice as “Personal Data” or “Personal Information” and further detail of what this includes are set out in this Privacy Notice below.

Data Protection Officer

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy and other relating queries or issues relating to the Personal Information held by us.

If you have any questions about this privacy policy, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

Our Services

The privacy and security of your personal information is very important to us so we want to assure you that your information will be properly managed and protected by us at all times. Please read this Privacy Notice carefully as it explains how we may collect and use your Personal Data.

This Privacy Notice may vary from time to time so please check it regularly. This Privacy Notice was last updated on 24 May 2018.

Our services consist primarily of risk consulting and insurance broking, which enable the consideration of, access to, administration of, and making of claims on insurance.

To arrange insurance cover and handle insurance claims, we, along with other participants in the insurance industry, are required to use and share Personal Data. During the insurance lifecycle we will receive Personal Data relating to potential or actual policyholders, beneficiaries under a policy, their family members, claimants and other parties involved in a claim. Therefore references to “individuals” in this notice include any living person from the preceding list, whose Personal Data we may receive in connection with the services we provides under our engagements with our clients. This notice sets out our uses of this personal data and the disclosures it makes to other insurance market participants and other third parties.



Data Protection Legislation

The data protection legislation in Malta is the Data Protection Act 2001 (the “**DPA**”) and implements European Directive 95/46/EC. On 25 May 2018 Regulation 2016/678 of the European Union on the protection of personal data (“**GDPR**”) comes into force and will, to the extent that there are GDPR and the DPA (and/or the DPA has not been amended) replace the DPA.

Personal Data that We Process

We collect and process the following Personal Data:

Individual details - name, address (and proof of address), other contact details (e.g. email and telephone details), gender, marital status, family details, date and place of birth, employer, job title and employment history, relationship to the policyholder, insured, beneficiary or claimant.

Identification details - identification numbers issued by government bodies or agencies (e.g. depending on the country you are in, social security or national insurance number, passport number, ID number, tax identification number, driver’s license number).

Financial information - payment card number, bank account number and account details, income and other financial information.

Insured risk - information about the insured risk, which contains Personal Data and may include, only to the extent relevant to the risk being insured:

- **Health data** - current or former physical or mental medical conditions, health status, injury or disability information, medical procedures performed, relevant personal habits (e.g. smoking or consumption of alcohol), prescription information, medical history;
- **Criminal records data** - criminal convictions, regarding relevant driving offences for assessing motor insurance risks ; and
- **Other Special Categories of Personal Data** - racial or ethnic origin, genetic data, biometric data.

Policy information - information about the quotes individuals receive and the policies they obtain.

Credit and anti-fraud data - credit history and credit score, information about fraud convictions, allegations of crimes and sanctions details received from various anti-fraud and sanctions databases, or regulators or law enforcement agencies.

Previous claims - information about previous claims, which may include health data, criminal records data and other Special Categories of Personal Data (as described in the Insured Risk definition above).

Current claims - information about current claims, which may include health data, criminal records data and other Special Categories of Personal Data (as described in the Insured Risk definition above).



Marketing data - whether or not the individual has consented to receive marketing from us.

Website and communication usage - details of your visits to our websites and information collected through cookies and other tracking technologies, including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

Personal Data does not include data where the identity has been removed (anonymous data).

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your Personal Data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy notice.

Sources of Personal Data

We collect and receive Personal Data from various sources, including (depending on the service provided and country you are in):

- Individuals and their family members, online or by telephone, or in written correspondence
- Individuals' employers or trade or professional associations of which they are a member
- In the event of a claim, third parties including the other party to the claim (claimant/ defendant), witnesses, experts (including medical experts), loss adjusters, lawyers and claims handlers
- Other insurance market participants, such as insurers, reinsurers and other intermediaries
- Credit reference agencies (to the extent we are taking any credit risk)
- Anti-fraud databases and other third party databases, including sanctions lists
- Government agencies, such as vehicle registration authorities and tax authorities
- Claim forms
- Open electoral registers and other publicly available information
- Business information and research tools
- Third parties who introduce business to us and;
- Forms on our website and your interactions with our website.



How We Use and Disclose Your Personal Data

In this section, we set out the purposes for which we use Personal Data, explain how we share the information, and identify the 'legal grounds' on which we rely to process the information.

These 'legal grounds' are set out in the General Data Protection Regulation (the "**GDPR**"), which allows companies to process Personal Data only when the processing is permitted by the specific "legal grounds" set out in the GDPR. These grounds are that your Personal Data must be:

- used lawfully, fairly and in a transparent way;
- collected only for specified and legitimate purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes we have told you about;
- accurate and kept up to date;
- not kept in a form which permits your identification for longer than necessary and kept only as long as necessary for the purposes we have told you about;
- kept secure.

Please note that in addition to the disclosures we have identified below, we will disclose Personal Data for the purposes we explain in this Privacy Notice to service providers, contractors, advisers, agents and Argus Group companies that perform activities on our behalf.

We set out in the schedule a table the purposes for which we might use your Personal Data.

Consent

In order to facilitate the provision of insurance cover and administer insurance claims, unless another legal ground applies, we rely on the data subject's explicit consent to process Special Categories of Personal Data as set out in the schedule. This consent allows us to share the information with other insurers, intermediaries and reinsurers that need to process the information in order to undertake their role in the insurance market (which in turn allows for the pooling and pricing of risk in a sustainable manner).

The affected individual's consent to this processing of Special Categories of Personal Data may be necessary for us to be able to provide the services the client requests.

Where you are providing us with information about a person other than yourself, you agree to notify them of our use of their Personal Data and to obtain such consent for us.

Individuals may withdraw their consent to such processing at any time by contacting our Data Protection Officer using the contact details at the Questions, Requests or Complaints section below. However, doing



so may prevent us from continuing to provide the services to the relevant client. In addition, if an individual withdraws consent to our/an insurer's or reinsurer's processing of their Special Categories of Personal Data, it may not be possible for the insurance cover to continue.

Safeguards

We have in place physical, electronic, and procedural safeguards appropriate to the sensitivity of the information we maintain. These safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the Personal Data, and include measures designed to keep Personal Data protected from unauthorized access. If appropriate, the safeguards include the encryption of communications via Secure Sockets Layer, encryption of information during storage, firewalls, access controls, separation of duties, and similar security protocols. We restrict access to Personal Data to personnel and third parties that require access to such information for legitimate, relevant business purposes.

Limiting Collection and Retention of Personal Data

We collect, use, disclose and otherwise process Personal Data that is necessary for the purposes identified in this Privacy Notice or as permitted by law. If we require Personal Data for a purpose inconsistent with the purposes we identified in this Privacy Notice, we will notify clients of the new purpose and, where required, seek individuals' consent (or ask other parties to do so on our behalf) to process Personal Data for the new purposes.

Our retention periods for Personal Data are based on business needs and legal requirements. We retain Personal Data for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When Personal Data is no longer needed, we either irreversibly anonymise the data (in which case we may further retain and use the anonymised information) or securely destroy the data.

Individuals may request additional information about the specific safeguards applied to the export of their Personal Data.

Sharing of Personal Data

We may share Personal Data about you with various entities within the Argus Group, including internal service providers which perform, for example, printing, mailing, and data processing services. In circumstances where the Argus Group entity is outside of the EEA, we ensure that the recipient Argus Group entity has adequate and appropriate safeguards in order to protect that Personal Data. See more below.



Cross-Border Transfer of Personal Data

We may transfer Personal Data to, or permit access to Personal Data from, countries outside the European Economic Area (EEA). These countries' data protection laws do not always offer the same level of protection for Personal Data as offered in the EEA. We will, in all circumstances, safeguard Personal Data as set out in this Privacy Notice and ensure that the recipient of your Personal Data provides your Personal Data with the same level of protection required of us.

Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections as EEA data protection laws. EU data protection laws allow us to freely transfer Personal Data to such countries.

If we transfer Personal Data to other countries outside the EEA, we will establish legal grounds justifying such transfer, such as model contractual clauses, individuals' consent, or other legal grounds permitted by applicable legal requirements.

Individuals can request additional information about the specific safeguards applied to the export of their Personal Data.

Accuracy, Accountability and Openness

We strive to maintain Personal Data that is accurate, complete and current. Individuals should contact us at DPO@Islandins.com to update their information.

Questions regarding our privacy practices should be directed to our Data Protection Officer using the contact details in the Questions, Requests or Complaints section below.

It is important that the personal information that we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Marketing and Opting Out

We do not currently engage in direct marketing, however if this policy changes at a future date you will be given the opportunity to withhold or give your permission to receive such materials through an opt out or in message.

You can subsequently ask us to stop sending you marketing messages at any time by unsubscribing or contacting us at any time.

Change of Purpose

We will only use your personal data for the purposes for which we collected and as set out in this Privacy Notice.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.



Your Rights

Under certain conditions, individuals have the following rights:

The right to be informed - We need to be clear with you about what data is being collected, how it's being used, how long it will be kept and whether it will be shared with any third parties. This information must be communicated concisely and in plain language.

The right to access - You may submit subject access requests, which oblige us to provide a copy of any Personal Data concerning you. We have one month to produce this information, although there are exceptions for requests that are manifestly unfounded, repetitive or excessive.

The right to rectification - If you discover that the information we hold on you is inaccurate or incomplete, you may request that it be updated. As with the right to access, we have one month to do this, and the same exceptions apply.

The right to erasure - (also known as 'the right to be forgotten') You may request that we erase your Personal Data in certain circumstances, such as when the data is no longer necessary, the data was unlawfully processed or it no longer meets the lawful ground for which it was collected. This includes instances where you withdraw consent. This is not an absolute right, we may be justified in keeping certain Personal Data in order to perform a contract with you, comply with legal obligations or in relation to the exercise or defence of legal claims.

The right to restrict processing - You may request that we limit the way we use your Personal Data. It's an alternative to requesting the erasure of data and might be used when you contest the accuracy of the Personal Data or when you no longer need the information but we require it to establish, exercise or defend a legal claim.

The right to data portability - You are permitted to obtain and reuse your Personal Data for your purposes across different services. This right only applies to personal data that you have provided to us by way of a contract or consent.

The right to object - You may object to the processing of Personal Data that is collected on the grounds of legitimate interests or the performance of a task in the interest/exercise of official authority. We must stop processing information unless we can demonstrate compelling legitimate grounds for the processing that overrides your interests, rights and freedoms or if the processing is for the establishment or exercise of defence of legal claims.

Rights related to automated decision making including profiling - The GDPR includes provisions for decisions made with no human involvement, such as profiling, which uses Personal Data to make calculated assumptions about you. There are strict rules about this kind of processing, and you are permitted to challenge and request a review of the processing if you believe the rules aren't being followed.



The right to object to direct marketing - You may object to direct marketing (including any profiling for such purposes) at any time.

The right to complain to your data protection regulator –you are able to submit a complaint to the Regulator about any matter concerning your personal information, using the details below. However, we take our obligations seriously, so if you have any questions or concerns, we would encourage you to raise them with us first, so that we can try to resolve them.

Access Requests

You will not have to pay a fee for accessing the Personal Data controlled by us. However, we may refuse to comply with your request in circumstances where your request is clearly unfounded, repetitive or excessive.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests as soon as reasonably practicable and, in any event, within 30 days of receipt of the request. Where we cannot comply within 30 days we will inform you immediately.

Our Regulator

Office of the Information and Data Protection Commissioner

2nd floor

Airways House

High Street

Silema SLM 1549

Malta

Tel: +356 2328 7100

Email: [idpc.info@idpc.org.mt](mailto:info@idpc.org.mt)

These rights are subject to certain exemptions to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege). We will respond to most requests within 30 days.

If we are unable to resolve an enquiry or a complaint, individuals have the right to contact the Malta data protection regulator, the Office of the Information and Data Protection Commissioner.



Questions, Requests or Complaints

To submit questions or requests regarding this Privacy Notice or our privacy practices, please write to the Data Protection Officer at the following address:

The Data Protection Officer
Island Insurance Brokers Limited
Insurance House
Psaila Street
Birkirkara
Malta BKR 9078

Email: DPO@Islandins.com

Links to Third Party Websites

Our websites may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your Personal Data. Please check these policies before you submit any Personal Data to such third party websites.

Changes to this Privacy Notice

This Privacy Notice is subject to change at any time. It was last changed on 24 May 2018. If we make changes to this Privacy Notice, we will update the date it was last changed. Where we have an engagement with you, we will notify you of any changes we make to this Privacy Notice in accordance with the notice provisions in the terms of our engagement. In other circumstances, we will publish the revised Privacy Notice on our website.



Schedule

We set out in the table below the purposes for which we might use your Personal Data:



Purpose	Categories of Data	Legal Grounds	Disclosures
<p>QUOTATION / INCEPTION</p> <p>Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Performance of our contract with you • Compliance with a legal obligation • For our legitimate business interests (to ensure that the client is within our acceptable risk profile) • To assist with the prevention of crime and fraud 	<ul style="list-style-type: none"> • Credit reference agencies • Antifraud and sanctions databases
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Credit and antifraud data 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • In the substantial public interest • Consent 	
<p>QUOTATION / INCEPTION</p> <p>Evaluating the risks to be covered and matching to appropriate policy/premium</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Performance of our contract with you • For our legitimate business interests (to determine the likely risk profile and appropriate insurer and insurance product) 	
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Risk details • Previous claims • Credit and antifraud checks 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent 	



<p>QUOTATION / INCEPTION and POLICY ADMINISTRATION</p> <p>Collection or refunding of premium</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Financial information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Performance of our contract with you • For our legitimate business interests (to recover debts due to us) 	<ul style="list-style-type: none"> • Other insurance market participants such as intermediaries, insurers and reinsurers • Banks
<p>POLICY ADMINISTRATION</p> <p>General client care, including communication with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy. Notifying you about changes to our terms or privacy notice</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Performance of our contract with you • For our legitimate business interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) • Compliance with a legal obligation • Consent 	
<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Risk details • Previous claims • Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent 		



<p>CLAIMS PROCESSING</p> <p>Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Performance of our contract with you • For our legitimate business interests (to assist our clients in assessing and making claims) 	<ul style="list-style-type: none"> • Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim (including without limitation other insurance market participants such as intermediaries, insurers and reinsurers)
<p>CLAIMS PROCESSING</p> <p>Defending or prosecuting legal claims</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Performance of our contract with you • For our legitimate business interests (to assist in assessing and making claims) 	<ul style="list-style-type: none"> • Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim (including without limitation other insurance market participants such as intermediaries, insurers and reinsurers)
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Credit and antifraud data • Risk details • Previous claims • Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent • For legal claims 	



<p>CLAIMS PROCESSING</p> <p>Investigating and prosecuting fraud</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Performance of our contract with you • For our legitimate business interests (to assist with the prevention and detection of fraud) 	<ul style="list-style-type: none"> • Solicitors • Private investigators • Police • Experts • Third parties involved in the investigation or prosecution • Other insurance market participants such as intermediaries, insurers and reinsurers • Antifraud databases
<p>RENEWALS</p> <p>Contacting you in order to renew the insurance policy</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Performance of our contract with you • For our legitimate business interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) • Consent 	
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Health data • Criminal records data • Other sensitive data • Credit and antifraud data • Risk details • Previous claims • Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent • For legal claims • In the substantial public interest 	
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Risk details • Previous claims • Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent 	



<p>THROUGHOUT THE INSURANCE LIFECYCLE</p> <p>Transferring books of business, company sales and re-organisations. To administer and protect our business</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information • Marketing and communications data 	<p>Personal Data:</p> <ul style="list-style-type: none"> • For our legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and to structure our business appropriately) • Compliance with a legal obligation 	<ul style="list-style-type: none"> • Courts • Purchaser
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Credit and antifraud data • Risk details • Previous claims • Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent • In the substantial public interest 	
<p>THROUGHOUT THE INSURANCE LIFECYCLE</p> <p>General risk modelling and underwriting</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • For our legitimate business interests (to build risk models that allow placing of risk with appropriate insurers) 	
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Credit and antifraud data • Risk details • Previous claims • Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent 	



<p>THROUGHOUT THE INSURANCE LIFECYCLE</p> <p>Complying with our legal or regulatory obligations</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information • Marketing and communications data 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Compliance with a legal obligation 	<ul style="list-style-type: none"> • PRA, FCA, ICO and other regulators • Police • Other insurance market participants such as intermediaries, insurers and reinsurers (under court order) • Insurance Fraud database
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Credit and antifraud data • Risk details • Previous claims • Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent • In the substantial public interest 	
<p>MARKETING</p> <p>To make suggestions and recommendations to you about products or services or events that may be of interest to you and to provide industry insight</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • For our legitimate interests (to develop our products/services and grow our business) 	