

Harbour Underwriting
4th Floor
8 Waterloo Place
London
SW1Y 4BE



Fair Processing Notice

Harbour Underwriting Limited

Statement of Confidentiality & Ownership

This document constitutes confidential and proprietary information belonging to Harbour Underwriting Limited (“Harbour”) and may only be disclosed and/or used in accordance with permission granted by Harbour. No part of this document may be reproduced, stored in a retrieval system, or transmitted in any way or by any means including photocopying or recording, without the written permission of Harbour. Harbour reserves its rights to take such action as is necessary to protect its confidential and proprietary information.



Fair Processing Notice

Harbour Underwriting Limited (HUL) is committed to protecting and respecting your privacy.

This fair processing notice sets out how and why we collect and use ("process") your personal data, if:

1. you are applying for an insurance policy
2. you are an existing policy holder

This notice also describes your rights under data protection law.

We will only process your personal data as set out in this notice. If we need to use your data for any other purpose, we may do so if that purpose is compatible with this notice, and we will inform you before we use it in such a manner unless we are prohibited from notifying you by law.

Who are we?

HUL is authorised to quote for, issue and manage After the Event (ATE) Insurance as agent of Accredited Insurance (Europe) Limited – UK Branch. HUL is authorised and regulated by the Financial Conduct Authority.

Depending on how you are introduced to us and your relationship with other professionals, HUL may act as either a data controller or processor. The details of all the entities associated with HUL, which may control and/or process your personal data (in accordance with this notice), are listed in Schedule 1.

Why do we process your personal data?

We need to collect and use personal data to carry out our business, which is that of quoting for, issuing and managing ATE Insurance. There are various reasons why we process personal data.

Primarily we process personal data to:

- Consider and make decisions on applications for ATE insurance, including reviewing potential evidence to evaluate the merits of a legal claim and seeking opinions and advice from advisors
- Provide quotes for an ATE insurance policy
- Invoice for and collect premiums
- Issue ATE insurance policies
- Manage ATE insurance policies
- Assess and administer the payment of any claim

We also process personal data to:

- Communicate with you in connection with an application for a new or an existing ATE insurance policy
- Prevent and detect money laundering, fraud, terrorist financing, bribery, corruption, tax evasion, breaches of economic and trade sanctions and other illegal activity, including by carrying out due diligence and reporting suspicions of illegal activity
- Cooperate with law enforcement authorities and fraud prevention agencies
- Cooperate with and comply with the requirements of regulatory bodies and other competent authorities
- Improve our business and ensure its proper and efficient functioning, including by utilising business intelligence, conducting statistical analysis, consulting with external advisors and carrying out audits
- Ensure the security of the HUL network, offices and individuals on-site
- Report to internal boards and committees (including Harbour group boards and committees)
- Complete accounting and auditing activities
- Promote our business
- Enforce our rights and protect HUL, including by obtaining advice and pursuing legal action
- Provide your contact details to selected third parties in respect of relevant direct marketing communications

Where do we obtain your personal data from?

Primarily the data we process on you has been obtained directly from you, from your employer, your representative, your legal adviser, an associated third party, a litigation funder or a broker/introducer. Where applicable, we may utilise public records, such as company and regulator registers and third-party vendors to verify information and conduct



anti-money laundering/know your customer screening. Third-party vendors may collate publicly available information into an easily searchable format.

If you provide personal data to us about someone else (such as one of your directors or employees, someone with whom you have business dealings or are a party to legal proceedings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Fair Processing Notice and our Privacy Policy. In particular, you must ensure the individual concerned is aware of the various matters detailed in this Fair Processing Notice and our Privacy Policy.

Our Privacy Policy can be found on our website or send an email to enquiries@harbourunderwriting.com for a copy of our Privacy Policy.

What personal data do we process?

We may process personal data:

- which you provide us with
- which we gather from other sources (as explained above)

Identity & contact information

- Name
- Sex
- Date of Birth
- Nationality
- Signature
- Postal address
- Registered address
- E-mail address
- Telephone number
- Legal domicile
- Place of Birth

Marital status and/or financial associations

- Marital status
- Family member's name (spouse, minors, etc.) and other beneficiaries as requested by you

Work Details

- Department
- Role

Financial details/ circumstances

- Bank account details
- Taxation details
- Source of Funds & Source of Wealth
- Investment Data
- Information about investment, savings and assets

Special Categories (Sensitive categories)

- Passport Number
- Tax ID
- Nationality
- Photograph
- Relevant or Incidental Health Information as provided by you
- Sanction screening and adverse media searches

Other

- Telephone recordings
- Details of your legal representatives
- Information about civil proceedings you have been involved in



In addition, we process personal data which we do not obtain directly from you, namely:

- Information about whether you are subject to any sanctions
- Information about the merits of your legal proceedings
- Information about you which is found in the media
- Information about other parties linked to your legal proceedings
- Information about civil and criminal proceedings you have been or are involved in, including the outcome of such proceedings.

Please note that we will carry out searches of publicly available sources such as internet searches for adverse media references and searches of public data bases such as company listings and registers maintained by regulators.

Personal data can only be processed if the processing is permitted by law. We process your personal data on the basis of the following justifications (or "legal bases"):

- the processing is necessary for performing a contract with you or in order to take steps which are required to enter into such a contract
- the processing is necessary for compliance with a legal obligation which we are subject to
- the processing is necessary for our legitimate interests or the legitimate interests of another person if we consider that such legitimate interests are not overridden by your rights and freedoms

The data we process can also include data which is considered to be "**special category data**". Special category data means information which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health and data concerning sex life or sexual orientation. Stricter conditions apply to the processing of special category data and we only process such data if these conditions are satisfied. Special category data that we process may include:

- Relevant or Incidental Health Information as provided by you

In addition, we may need to process information about **criminal offences, convictions and proceedings** you are or were involved in. This is done in order to assess legal proceedings which are being considered for ATE insurance, to assess any reputational risks to HUL or to manage existing policies.

Who can access your personal data?

HUL may provide your details to other parties, including:

- **The associated entities**, which are listed in Schedule 1.
- **The shareholders of HUL**
- **Litigation Funders who are funding your legal proceedings**
- **Our regulators and supervisory authorities**
- **Professional advisors and consultants** we may engage:
 - legal advisors
 - tax advisors
 - financial advisors
 - PR consultants
 - Placing Agents
 - Insurance brokers
 - Auditors of our business
 - Consultants
- **Other insurance providers**
- **Service providers** we contract with to perform certain functions on our behalf, such as providers of
 - Data hosting
 - Telecommunications
 - IT services
 - Software support and development
 - Computer maintenance contractors
 - Printing companies
 - Document storage and destruction companies
 - Archiving service providers
 - Background checking



- **Fraud prevention agencies and law enforcement authorities** such as the police, the UK National Crime Agency. We may notify the competent authorities if we suspect fraud or other illegal activity. This may involve disclosing personal data to such authorities.
- **Other recipients.**
 - Buyers and prospective buyers of our business or assets

If you have any questions or concerns about the sharing of your personal data as described above, please contact us using the contact details provided in this fair processing notice.

What countries is your data transferred to?

In most circumstances data will be processed within the European Economic Area (EEA). However, depending on the location of the legal proceedings and the key parties to these proceedings, we may transfer, store and process your personal data, if required for the purposes described above, in countries which do not provide the same level of protection as the UK or EEA. This may also include your personal data being processed by staff operating outside the UK or EEA who work for us or for one of our suppliers.

We will ensure that:

- prior to undertaking any such transfers HUL will ensure that adequate safeguards have been put in place such as Intra-Group processing agreements, EU/UK Model Contracts and Standard Contractual Clauses
- any such international transfers are made subject to appropriate or suitable safeguards as required by the UK General Data Protection Regulation (UK-GDPR) and General Data Protection Regulation (GDPR) or other relevant laws

Third parties with whom we share personal data, in accordance with this notice may also transfer personal data outside the UK/EEA. More information about this can be obtained from the third parties directly and we are not responsible for such transfers which they make.

What security measures do we have in place?

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect and hold.

How long will we retain your data?

Your personal data will be deleted when it is no longer reasonably required for the purposes outlined above or if you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data.

What are your rights?

Under Data Protection Regulations you have a number of rights in relation to the way we process your Personal Data. These include the right to:

- request a copy of the personal data, subject to certain legal conditions, which we hold
- have any inaccurate personal data corrected
- object to or restrict the use of your personal data
- request that your personal data is erased where you suspect that your personal data is processed without a legitimate reason or where you believe we no longer have grounds to process your personal data
- make a complaint if you have a concern about our handling of your personal data
- request not to receive our communications any longer
- withdraw your consent to process your personal data

The above is only a summary of your rights as a data subject. These rights are subject to various conditions and exceptions which are provided for by law. If you would like more information on your rights or if you would like to exercise any of your rights please contact us using the contact details provided in this fair processing notice.

Please note that we are under no obligation to rectify or delete your personal data where to do so would prevent us from meeting our legal or regulatory obligations.

If you have any concerns regarding our processing of your personal data, or are not satisfied with our handling of any request by you in relation to your rights, you also have the right to make a complaint to a supervisory authority. A list of



the supervisory authorities in the UK and European Union and the European Free Trade Area, including their contact information, can be accessed here:

http://ec.europa.eu/newsroom/article29/document.cfm?action=display&doc_id=50061

Changes to this notice

We may update this notice from time to time. We will notify you of the changes where required by law to do so

How to contact us

Address: Harbour Underwriting Limited
4th Floor
8 Waterloo Place
London SW1Y 4BE

Telephone: +44 20 3829 9400

Email: info@harbourunderwriting.com

SCHEDULE 1: LIST OF HUL ASSOCIATED ENTITIES			
Country	Name of Harbour Group entity and Registration	Controller/Processor	Address
UK	Harbour Underwriting Limited	Controller/Processor	4 th Floor, 8 Waterloo Place, London, SW1Y 4BE
UK	Accredited Insurance (Europe) Limited – UK Branch	Processor	71 Fenchurch Street, London, EC3M 4BS
Malta	Accredited Insurance (Europe) Limited	Processor	Skyway Offices, 3rd Floor, 177/179 Marina Street, Pieta PTA 9042, Malta4
Switzerland	Swiss Re	Processor	Mythenquai 50, 8002 Zurich, Switzerland
Germany	Swiss Re	Processor	Arabellastrasse 30, 81925 München, Germany



Harbour Underwriting Limited is authorised and regulated by the Financial Conduct Authority (Firm reference number 939803).

Harbour Underwriting Limited. Registered Office: 4th Floor, 8 Waterloo Place, London, SW1Y 4BE.
Registered in England and Wales (Company number 10384185).