

RenaissanceRe

RenaissanceRe Syndicate
Management Limited

Privacy Policy

Introduction

RenaissanceRe Syndicate Management Limited (“RenaissanceRe”) is part of the RenaissanceRe Group of Companies and we are a regulated financial services firm in the UK providing insurance and reinsurance to a range of customers through our Syndicate at Lloyd’s. This privacy notice outlines how we use the information we process about you, how and why we use that data, your rights and what to do if you have any questions or concerns.

As part of your insurance policy or at the point of making a claim you should have been provided with a summary privacy notice. If you have not seen a copy of this then please contact us via the contact details section below.

Insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, insurers and reinsurers. The [London Market Core Uses Information Notice](#) sets out those core personal data uses and disclosures, along with a number of terms which are defined within this notice.

Our core uses and disclosures are consistent with the London Market Core Uses Information Notice. As such the personal data we may process on you will be limited to the categories, purposes and uses outlined within this privacy notice.

If you have any questions or concerns then please contact our Data Protection Officer using the contact details provided in this privacy notice.

Types of data we may collect

In order for us to provide insurance quotes, insurance policies, and/or deal with any claims or complaints, we need to collect and process personal data about you. The types of personal data that are processed may include:

<u>Types of Personal Data</u>	<u>Details</u>
Individual details	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you. This information will not typically be collected by RenaissanceRe however may be required to pay a claim, help prevent fraud or may be information provided by you as part of a claim or a complaint.
Identification details	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number. This information may be used to verify your identity prior to paying a claim or to prevent fraud.
Financial information	Bank account or payment card details, income or other financial information.
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 or other information you provide us with as part of a claim or a complaint which are special categories of personal data.
Policy information	Information about the quotes you receive and policies you take out.
Sanctions, criminal offences and anti-money laundering data	Sanctions and criminal offences information which is publically available relating to you.
Previous and current claims	Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health or other information you provide us with as part of a claim or a complaint which are special categories of personal data.
Special categories of personal data	<p>Certain categories of personal data which have additional protection under the GDPR. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation.</p> <p>RenaissanceRe will not typically process information relating to the categories listed above other than where this information is publically available, specifically requested from you with your consent or where you have made this information available to us as part of a claim or a complaint.</p>

How we collect your personal data

We might collect your personal data from various sources, including:

- you;
- your family members, employer or representative;
- other insurance market participants;
- sanctions lists, court judgements and other databases of publically available information;
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers

Which of the above sources apply will depend on your particular circumstances.

Why we use your personal data

We set out below the purposes why we and other insurance market participants might use your personal data.

Purposes

Quotation/Inception:

- Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks
- Evaluating the risks to be covered and matching to appropriate policy/ premium
- Payment of premium where the insured/policyholder is an individual

Policy administration:

- Client care, including communicating with you and sending you updates
- Payments to and from individuals

Claims Processing:

- Managing insurance and reinsurance claims
- Defending or prosecuting legal claims
- Investigating or prosecuting fraud

Renewals:

- Evaluating the risks to be covered and matching to appropriate policy/ premium
- Payment of premium where the insured/policyholder is an individual

Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period:

- Complying with our legal or regulatory obligations
- General risk modelling
- Transferring books of business, company sales & reorganisations

Please note that we may also disclose personal data for the purposes outlined above to our service providers, contractors, agents and group companies that perform activities on our behalf.

The use of consent to process your data

In order to provide you with insurance cover or to deal with insurance claims there may be certain circumstances where we need to process your special categories of personal data, such as your health data. We will not typically request this from you, however this information may be processed as part of a claim or a complaint, and in order for us to provide you with the best possible service we may need to obtain your consent to process this data.

In these instances, explicit consent will be requested from you, and you retain the right to withdraw your consent to such processing at any time. However, if you withdraw your consent this may impact our ability to pay claims or handle your complaint.

Profiling and automatic decision making

In some instances insurance market participants may use your personal data as part of a process known as profiling. Profiling is the use of automated processing of personal data to evaluate and then analyse or predict personal aspects concerning your health, reliability, behaviour, economic situation and other personal aspects. We do not perform solely automated decision-making (including profiling) for our insurance activities.

How we store your data

We will keep your personal data only for as long as is necessary and only for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either you or we may wish to bring a legal claim under your insurance, or where we are required to keep your personal data due to legal or regulatory reasons.

How and when we may share your data

External companies, organisations and authorities

We may share your personal data with external organisations such as law-enforcement agencies, regulatory authorities or government agencies where we are required to provide this information by law. These organisations may include any of the following: the Financial Conduct Authority, Prudential Regulatory Authority, Financial Ombudsman Service and the Information Commissioner's Office (ICO).

Intra-group transfers and international data transfers

We may also share your personal data with group companies who are based in jurisdictions outside of the European Economic Area (EEA). Those transfers will always be made in compliance with GDPR and subject to appropriate safeguards and controls being in place. These safeguards include the use of appropriate technical and organisation measures (IT and Cyber security) and the use of model contractual clauses approved by the European Commission and the ICO. If you would like further details of how your personal data will be protected if transferred outside the EEA, please contact our Data Protection Officer using the contact details listed in this privacy notice.

Your rights and contact details of the ICO

If you have any questions in relation to our use of your personal data, you should first contact our Data Protection Officer using the details set out in the section 'Our Contact Details' below.

Under certain conditions, you may have the following rights:

Rights	Detail
Right of transparency	You may ask us to provide you with further details on the use we make of your personal data/special category of data.
Right of access	You may ask us to provide you with a copy of the personal data that you have provided to us.
Right to rectification	You may ask us to update any inaccuracies in the personal data we hold.
Right to erasure	You may ask us to delete any special category of data/personal data that we no longer have a lawful ground to use.
Right to withdraw consent	Where processing is based on consent, the right to withdraw your consent so that we stop that particular processing.
Right to object	You may object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
Right to restriction of processing	You may ask us to restrict how we use your personal data whilst a complaint is being investigated.
Right to data portability	You may ask us to receive your personal data in a structured, commonly used and machine-readable format

In certain circumstances, we may need to restrict the above 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). To exercise these rights or to find out if these rights will apply then please contact our Data Protection Officer.

Your right to complain to the ICO

If you unhappy with the way we have used your personal data or our response to any request by you to exercise any of your rights in the section above, or if you think that we have breached the GDPR, then you have the right to complain to the ICO, the Data Protection Regulator. Please see below for contact details of the ICO:

England	Scotland	Wales	Northern Ireland
Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF	Information Commissioner's Office 45 Melville Street Edinburgh EH3 7HL	Information Commissioner's Office 2 nd Floor Churchill House Churchill Way Cardiff CF10 2HH	Information Commissioner's Office 3 rd Floor 14 Cromac Place Belfast BT7 2JB
Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)	Tel: 0131 244 9001	Tel: 029 2067 8400	Tel: 0303 123 114 (local rate) or 028 9028 8757 (national rate)
Email: casework@ico.org.uk	Email: scotland@ico.org.uk	Email: wales@ico.org.uk	Email: ni@ico.org.uk

Our Contact Details

RenaissanceRe acts as a data controller for your personal data in a number of situations and if you have any questions or concerns over how your data has been processed then please contact our Data Protection Officer using the details below:

Email: DPO.UK@renre.com

Address:

The Data Protection Officer
RenaissanceRe Syndicate Management Limited
18th Floor
125 Old Broad Street, London
EC2N 1AR

In some circumstances the relevant data controller for your question or concern may be a market participant other than RenaissanceRe. For instance, where you purchased your insurance through an intermediary, the intermediary will be the initial data controller. Another example may be where you are not the policyholder or the insured, in which case this may be the organisation that collected your personal data.

If you have the contact details of the relevant data protection contact at the intermediary or the organisation that collected your personal data, then please speak to them and they can advise you on their data protection policy and how your personal data has been used and who this may have been passed to.

If you are unsure on the process or have any concerns as to how your personal data has been processed by other parties in the insurance chain then please contact our Data Protection Officer using the details set out above.