

PRIVACY NOTICE

Your privacy is important to us. We consider it crucial to protect your rights as our client under applicable data protection legislation and want you to feel confident about the privacy and security of your personal data.

This is a guide to how your personal data is managed by FirstUnited Insurance Brokers Limited. Please read it carefully.

1. Who we are

Your information will be held by **FirstUnited Insurance Brokers Limited**, a limited liability company registered under the laws of Malta with Company Registration Number C 22502 and having its registered office at Number 25, Villa Eden, Princess Elizabeth Street, Ta' Xbiex XBX1103, Malta (hereinafter referred to as "**FUIB**"). FUIB is an insurance broker, enrolled and regulated by the Malta Financial Services Authority, in terms of the Insurance Distribution Act (Chapter 487 of the laws of Malta).

Throughout this Privacy Notice, "**we**", "**us**", "**our**", and "**ours**" refer to FUIB.

More information about FUIB can be found at: www.firstunited.com.mt

2. The information we collect about you

We collect and process various categories of personal information at the start of and for the duration of your relationship with us. The information we collect about you may include:

- basic **personal** information (including your name and address, date of birth and contact details);
- **financial** information (including account and transactional information and history);
- information about your **family and social** circumstances (such as dependants, marital status, next of kin and contact details);
- **education** and **employment** information;
- **policy** information (including information about the quotes you receive and the policies you obtain);
- information about previous and current **claims**; and

- information about the **insured risk**, which may include, only to the extent relevant to the risk being insured, health data (including current or former physical or psychological health details or medical conditions) and criminal records data (relating to criminal convictions or offences and alleged offences).

3. The legal basis for using your information

We will only process your information in accordance with the provisions of the Data Protection Act (Chapter 586 of the Laws of Malta), the General Data Protection Regulation ((EU) 2016/679), and any and all national implementing laws and subsidiary legislation applicable in Malta relating to the processing of personal data, as introduced, amended or updated from time to time (hereinafter referred to as the "**Data Protection Laws**"). Data Protection laws say that we are allowed to use your personal information only if we have a proper reason to do so. Accordingly, we must have one or more of the following reasons:

- **to fulfil a contract that we have with you:** its use is necessary in relation to a service or a contract that you have entered into or because you have asked for something to be done so you can enter into a contract with us;
- **when it is in our legitimate interest:** we may process your information when we have a business or commercial reason to use your information. However, even where it is in our legitimate interest to do so, it must not unfairly prejudice your interests or fundamental rights and freedoms;
- **when it is our legal duty:** when you apply for a product or service (and throughout your relationship with us) we are required by law to collect and process certain personal information about you;
- when you have **consented** to the using of your data (including sensitive data) in a specific way;
- where we need to protect your **vital interests** or those of another person; and
- where it is required in the **public interest** or for **official purposes**.

4. When and how we collect information about you

As you use our services information is gathered about you. We collect information about you in view of:

- evaluating the risks to be covered, obtaining quotations and negotiating and placing your contract of insurance;
- the proper performance of your contract of insurance or the implementation of pre-contractual measures you request or require;
- collecting premiums and submitting other bills, settling claims or paying other benefits;
- compliance with legal obligations to which FUIB is subject, including but not limited to those obligations arising out of laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions;
- the handling of insurance claims;
- market research and analysis, internal management, accounting and auditing, product development and public relations;
- the exchange of information for preventing, suppressing and detecting of insurance fraud and any other criminal activity which we are bound to report; and
- the protection and promotion of our legitimate interests and the proper conduct of our business.

Your personal data is gathered from various sources, such as when you apply for our services, online or by telephone, from emails and other written correspondence, from proposal forms and fact-finding questionnaires, from insurance claims or other documentation, and from customer surveys, forms on our website and your interactions with our website.

5. Who we share your information with

Whilst you are our client, we undertake the responsibility not to transfer or exchange any information that we hold about you unnecessarily to or with any third parties without first obtaining your written consent. Nevertheless, and in line with our regulatory and legal obligations, there may be instances during the course of providing you with our services, where we may be required to disclose, share or exchange some or all of your

personal information, whether sensitive or otherwise, including *inter alia* to the following persons:

- your authorised representatives;
- other insurance market participants, such as insurers, reinsurers, and other intermediaries;
- surveyors, loss adjustors, and other appointed experts in the course of underwriting or claims management process;
- our agents and advisers who we use to help run your accounts and services;
- companies that provide support services for the purposes of protecting our legitimate interests (such as market research companies, document management, IT, software development and telecommunication services providers);
- statutory and regulatory bodies, and any public or governmental authority or enforcement agencies;
- any court or adjudicating body of a competent jurisdiction where disclosure is compelled by law or authorised/ordered by a court or adjudicating body of a competent jurisdiction;
- with entities you ask us to share your data; and
- in anonymised form, as part of statistics or other aggregated data shared with third parties.

6. How long we hold your information

In line with our regulatory and legal obligations, including *inter alia* the Anti-Money Laundering regime and the Maltese Tax legislation, and for the purpose of providing you with our services, we will generally keep your personal data for a maximum period of ten (10) years from date of termination of the client relationship, after which time it will be destroyed if it is no longer required for the lawful purpose(s) for which it was obtained.

We may on exception retain your information for longer periods, for instance in view of any outstanding claims or until, such time limit for claims arising from the transaction, has expired, or where we need to withhold destruction or disposal based on an order from the courts or an investigation by law enforcement agencies or our regulators.

7. Processing your information outside the EEA

Your information is stored on secure systems within FUIB premises. We may transfer or allow the transfer of information about you and your products and services with us to our service providers and other organisations outside the European Economic Area (hereinafter referred to as the “**EEA**”), but only if they agree to act solely on our instructions and protect your information to the same standard that applies in the EEA.

We are members of the Argus Group, therefore, we and other companies that are members of the said Group, may hold and process such information: i) in order to provide our services to you; ii) to facilitate the effective management, development or operation of the Argus Group; iii) to comply with applicable laws, prevent and detect fraud, and cooperate with regulators, where appropriate.

We will only send your personal information outside of the EEA to:

- follow your instructions;
- comply with a legal duty;
- work with our service providers and advisors to help run your services;
- to the Argus Group for the purposes indicated above

If we do transfer information outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA.

8. Security

We will implement all appropriate measures in order to protect the confidentiality, integrity and availability of all your data and we have appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing together with accidental alteration, destruction, loss and to also ensure compliance with the obligations imposed by the Data Protection Laws. We also maintain strict information security policies designed to prevent unauthorised access to your information.

9. Your rights

You have several rights in relation to how we use your information:

The right to be informed - You shall have the right to request us to inform you about the personal data that we process about you, the purpose of the processing, the categories of data that are being processed, the recipients of the data and the type of processing. Any such access requests must be made to us in writing and must further be signed by you as the data subject.

If you later wish to raise a complaint on how we handled your personal data, you can contact us to have the matter investigated. In the event that you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can then complain to the Information and Data Protection Commissioner's office.

The right to maintain your personal data accurate and up to date - We make every effort to ensure that all the personal data that we process about you is accurate and regularly updated. However, should you become aware of any errors or omissions in respect of your personal data you are kindly requested to inform us about such errors in writing. If it transpires that the information held is inaccurate, we will make the necessary amendments and inform you that these have been made.

The right to be forgotten - Subject to certain exceptions, you shall also have the right to request erasure of your personal data on *inter alia* the following grounds:

- where processing is no longer necessary for its intended purpose;
- if your personal data has been given to us solely for consultation purposes and you choose not to avail yourself of any of our services;
- when erasure is necessary for compliance with a legal obligation;
- when you object to the processing, unless there are overriding legitimate grounds for us to process that information;
- when the data concerns a child and has been collected solely for marketing purposes and not arising out of a contractual

- relationship for services required from us; and
- where any data has been collected solely for marketing purposes.

Instead of requesting erasure, you can also request a restriction of the processing of data in cases where the personal data is inaccurate, unlawful or pending a decision on a complaint lodged by you. In such case we can only store your personal data, and any further processing is only possible with your consent or in a limited number of situations.

The right to data portability - Since your personal data is subject to automated processing on the basis of our contractual relationship, you are thus allowed to request a copy of the data concerned in order for you to be able to transmit your processed data to another controller without any hindrance from our part.

The right to object - You have a right to object to us processing your personal information where the legal basis for our use of your data is our legitimate business interest or the performance of a task in the public interest. However, in doing so, this may have an impact on the services and products we can/are willing to provide. You also have the right to object to the use of your personal data for direct marketing purposes. If you object to this use, we will stop using your data for direct marketing purposes.

The right to withdraw your consent - Where we rely on your permission to process your personal information, you have a right to withdraw your consent at any time. We will always make it clear where we need your permission to undertake specific processing activities.

10. Implications of not sharing your information

As set out above, we may need to collect personal information in view of a legal requirement, or under the terms of a contract we have with you.

If you opt not to give us this personal information, it may delay or prevent us from meeting our obligations. Further, it may mean that we may not be able to provide you with

certain services that you request. We may not be able to continue to provide you with or renew existing services.

Please note that when we request information, we will tell you if providing it is a contractual requirement or not, and whether or not we need it to comply with our legal obligations.

11. How to contact us

If you have any questions concerning this Privacy Notice, wish to review your Personal Information that FUIB may have stored or exercise any of your rights listed above, please contact the Data Protection Officer (DPO) at:

Group DPO: Onesimus Nzabalinda
Local Point of Contact: Lara Michelle Camilleri

Address: FirstUnited Insurance Brokers Ltd, 25, Villa Eden, Princess Elizabeth Street, Ta' Xbiex, XBX 1103, Malta.

Tel: +356 2131 9000

Email: dpo@firstunited.com.mt

12. Changes to this Notice

We will update this Notice from time to time by publishing an updated version on our website: www.firstunited.com.mt