

ERGO Versicherung AG UK Branch and ERGO UK Specialty Ltd Data Privacy Notice

This data privacy notice is designed to help you understand how ERGO Versicherung AG UK Branch and/or ERGO UK Specialty (herein referred to as ERGO) processes your personal data.

This notice specifically covers what personal data we collect about you if you have made a claim against an ERGO policyholder.

Data Subject Access Rights

You have a number of rights in relation to the data we hold about you. These rights include but are not limited to:

- Data Portability: the transfer of your personal data to another Data Controller.
- Erasure: to have your personal data removed or deleted.
- Rectification: to have your personal data corrected if it is inaccurate.
- Restrict Processing: to restrict processing where your personal data is inaccurate, or the processing is unlawful.
- Subject Access Request: to access your personal data and information around its processing.
- To object to direct marketing.

Please note that there are times when we will not be able to delete your data. This may be as a result of a requirement to fulfil our legal and regulatory obligations or where there is a minimum statutory period of time for which we have to keep your data. If we are unable to fulfil a request, we will always let you know our reasons.

Please contact the Compliance Manager if you have questions concerning this Data Privacy Notice or your Data Subject Access Rights. You can contact the Compliance Manager at: MUNICH RE Group Offices, 13th Floor, 10 Fenchurch Avenue, London, EC3M 5BN or by emailing: Compliance@ergo-commercial.co.uk or by telephoning: 0203 003 7000

If you are unhappy with any response given or have a complaint, you can raise this with:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

What information do we collect about you, and what we use it for?

In the course of our relationship with you, we may collect and process your personal data for a range of different reasons. For each reason we must have a lawful basis for processing, and we will rely on the following as our lawful bases:

- We have a legitimate business need to use your personal data for business operational and administration purposes. When we use your personal data for these stated purposes, we have considered your rights and ensured that our business need does not cause you detriment.
- We have a legal or regulatory obligation to use your personal data.

Personal Data

Categories of data	Type of information processed	Where the data comes from	Purpose of Processing	Lawful basis of Processing	Who we disclose data to
Individual Information	Name, Address, Contact details, Date of birth, Gender, National Insurance or other identification information.	You Our Policyholder	To assess or assist in claims made either by or against our policyholders	We have a legitimate business need	Group companies and firms providing administration services. Reinsurers. Our agents and other intermediaries or market participants. Credit reference agencies. Anti-fraud databases. Government and Civil Agencies Regulatory Bodies
Financial and Business Information	Job title, Business Description, Employment History and Professional Certifications. Financial History, Income, Bank and Payment Details.	Third parties involved in the claims process including Claims Handlers, Claims Adjusters and Assessors, Relevant Claims Experts Third Parties involved in the claim such as other witnesses and claimants	Managing our business operations such as maintaining business and policy records. Analysing and improving the products and services we offer.	We have a legitimate business need	
Claim Information	Details about the incident in question	Anti-fraud databases.	Legal or Regulatory Purposes	We have a legal or regulatory obligation	
Statutory and anti-fraud information	Information from sanctions and anti-fraud databases concerning you.	Publically Available Sources	Prevention and Detection of Fraud	We have a legitimate business need	

We will only collect special categories of personal data when it directly relevant to the incident in question. When we process special categories of personal information, we must have one of the following additional lawful bases for processing listed below:

- You have provided your explicit consent we will need this consent before we can assist with any claims you have
- It is necessary for an insurance purpose and it is in the substantial public interest. This will apply where we are assisting with any claims under a policy and undertaking activities to prevent and detect fraud.
- Where the use of your special categories of data is necessary to establish, exercise or defend our legal rights.

Special Categories of Personal Data

Categories of data	Type of information processed	Where the data comes from	Purpose of Processing	Lawful basis of Processing	Who we disclose data to
Individual Information	Health information including history and medical reports.	You	To assess or assist in claims made either by or against our policyholders	You have provided your consent It is necessary for an insurance Purpose	Group companies and firms providing administration services. Reinsurers.
Claim Information	Details relevant to the incident in question	Third parties involved in the claims process including Claims Handlers, Claims Adjusters and Assessors, Relevant Claims Experts, Government and Civil Agencies	Legal or Regulatory Purposes	It is necessary to establish, exercise or defend our legal rights	Anti-fraud databases.
Statutory and anti-fraud information	Criminal records and convictions, including alleged offences and any caution, or court sentence. Information from sanctions and anti-fraud databases concerning you.	Anti-fraud databases. Publically Available Sources	Prevention and Detection of Fraud	It is necessary for an insurance Purpose, and the prevention and detection of fraud is in the substantial public interest.	Government and Civil Agencies

Personal information about others

In the course of the claims process, it may be necessary to collect data about other individuals, such as your family, employees or members of your household. If you give us information about another person, it is your responsibility to ensure and confirm that you have told that person why and how ERGO uses personal data and that you have that person's permission to provide that data (including any sensitive personal data) to us and for us to process it.

How we protect your information

Your privacy is important to us and we follow strict technical, physical and organisational procedures in the processing, storage, disclosure and destruction of your data. This is to protect against any unauthorised access or damage to, or disclosure or loss of, your data.

Use of Consent

In certain circumstances, we may need to process special categories of personal data, such as information about criminal convictions. To do this we may require your consent. You may withdraw your consent to processing at any time by contacting the Compliance Manager. We will always attempt to explain clearly when and why we need this information and the purposes for which we will use it and will obtain your explicit consent to use sensitive personal data.

Call monitoring and recording

For quality control purposes and to audit the way in which claims are handled, we may review recordings of telephone calls made to our claims handlers.

Data retention

Your personal data will only be kept for as long as it is necessary for the purpose for which it was collected.

Category of data	How long we retain your data
Claims Records (Files)	5 Years following full and final settlement
Claims Records	10 Years following full and final settlement

Transfer of data

Personal details may be transferred to countries outside the EEA. They will at all times be held securely and handled with the utmost care in accordance with all applicable principles of English law. Personal details will not be transferred outside the EEA unless it is to a country which is considered to have equivalent standards with regard to data protection, or we have taken reasonable steps to ensure that suitable data protection standards are in place. Your personal data may be disclosed to companies within the Group outside the EEA or to other entities outside the EEA that provide business services, subject to the above-mentioned data protection measures.

Changes to this information notice

We may amend this Privacy Policy from time to time for example, to keep it up to date or to comply with legal requirements. Should any significant changes be made to the ways in which ERGO processes data from those described at the time of collection, we will post a notice on our website.