

Liberty Specialty Markets takes the protection of your personal data seriously and is committed to protecting your privacy. This Privacy Notice contains details of the information that we collect from you and how we use that information. Please take the time to read this Privacy Notice carefully together with the Terms and Conditions.

## 1. About Liberty Specialty Markets

Liberty Specialty Markets is an international insurance company. We offer insurance for private individuals, companies and other insurers.

We collect and process data so that we can provide insurance services, which may include the preparation of an offer and subsequent insurance as well as the processing of any claims or complaints. We also collect your personal data in the context of contractual relationships, the development of customer relationships and the application process. This makes us the owner of the data collection ("controller").

Liberty Specialty Markets consists of several responsible parties, depending on the interaction you have with us or your written insurance policy.

- If you contact us as part of an application process, Liberty Specialty Markets Europe S.à.r.l., Luxembourg, Zurich branch is the data controller in relation to your personal data.
- If you are a broker, customer, supplier, contractual partner or other third party, one of the following persons is responsible for the processing of your personal data:
- Liberty Managing Agency Limited (for and on behalf of the underwriting members of Lloyd's syndicate 4472) and/or
- Liberty Mutual Insurance Europe SE and/or
- Liberty Specialty Markets Europe S.a.r.l. and/or
- Liberty Specialty Markets Europe Two S.a.r.l. and/or
- Liberty Mutual Reinsurance (a division of Liberty Mutual Insurance Company) and/or
- Liberty Specialty Markets MENA Limited and/or
- Liberty Specialty Markets Bermuda Limited and/or
- Liberty Specialty Markets Agency Limited.

Our trade names may appear in the documents you receive, including Liberty Specialty Markets, Liberty Mutual Reinsurance, Global Transaction Solutions or Liberty Mutual Surety.

The company responsible for processing your personal data is listed in the documents provided to you.

If you are a customer residing in California, please read the corresponding additional privacy notice [here](#).

If you are unsure who the data controller is in relation to your personal data, you can also contact us at any time by email [atdataprotectionofficer@libertyglobalgroup.com](mailto:atdataprotectionofficer@libertyglobalgroup.com) or by post at Data Protection Officer, Liberty Specialty Markets, 20 Fenchurch Street, London, EC3M 3AW.

## 2. About the insurance market

Operating an insurance business involves the use and disclosure of your data by various players in the insurance market, such as intermediaries, insurers and reinsurers. The [London Insurance Market Core Uses Information Notice](#) outlines the key necessary data collection holders and their uses and disclosures. Our core uses and disclosures of data are consistent with the London Market Core Uses Information Notice. We encourage you to read this notice (by clicking on the link above).

### 3. Our processing of your personal data and particularly sensitive personal data

The type of personal data we collect and our use of that personal data will depend on our relationship with you. For example, we collect different personal data depending on whether you are a policyholder, beneficiary of an insurance policy, claimant, witness, broker, potential employee or other third party.

Sometimes we will request or receive particularly sensitive personal data ("sensitive personal data") from you, e.g. information about your health, privacy, sex life, sexual orientation, genetic or biometric data, racial or ethnic origin, political, religious or philosophical beliefs and activities, trade union membership and activities, social assistance measures, administrative or criminal prosecutions and sanctions. For example, we need access to information about your health in order to make you an offer, draw up your insurance policy or process your claims. We may also need details of unspent criminal convictions in connection with the prevention of fraud.

This notice sets out the legal basis that enables us to process your personal data and particularly sensitive personal data.

If the provision of information is required by law or contract, we will inform you of this at the time of collection.

If you provide us with personal data about other natural persons (e.g. family members) or legal entities (e.g. employers), we are also responsible for their personal data. You should make them aware of this data protection notice before you provide us with personal data on behalf of third parties.

We may change the personal data in such a way that we cannot identify you even in combination with other data that we hold. This data is not subject to this Privacy Notice or applicable data protection laws.

To make this privacy notice as user-friendly as possible, we have divided it into different sections. To reflect our global presence, this Privacy Notice is available in different languages. Please click on the section below that best describes your relationship with us.

#### 3.1 Potential policyholders or beneficiaries

If you apply for an insurance policy or if someone else (e.g. a family member or your employer) applies for an insurance policy that benefits you, this section is relevant to you and describes our use of your personal data.

##### What personal data we collect

- General information such as name, address, telephone number, e-mail address, date of birth and gender.
- Information about your relationship to the policyholder in whose insurance policy you are the beneficiary.
- Identification information such as passport details, driving licence and national insurance number.
- Your bank and payment details.
- Information about your job (if required), such as job title, professional background and professional qualifications.
- Financial information about you that we have received as a result of credit checks, e.g. bankruptcy orders, debt-restructuring moratoria or court judgements.
- Information we receive in the course of sanctions list reviews, e.g. from the United Nations, European Union, Swiss State Secretariat for Economic Affairs, UK Treasury, U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.
- Information relevant to your insurance application, such as previous insurance policies and claims made. This also includes specific information relating to the insurance policy for which you are applying. For example, if you are applying for fine art insurance, we will collect information relating to your art collection.
- Information obtained from publicly available sources such as the electoral register, newspapers and social media sites. Other information that comes from you, your insurance broker or another person making an application on your behalf.

##### Which particularly sensitive personal data we collect

- Details of your criminal convictions and related information. This includes information about offences you have committed or court judgements in which you are or have been a party or otherwise involved.
- Information about your physical and mental health that is relevant to your insurance policy or claim (e.g. we may need information about pre-existing medical conditions if you are taking out or have taken out accident insurance). This may be in the form of medical reports or underlying medical data such as x-rays or blood tests.
- We may also collect information relevant to your insurance policy or claim, such as data relating to race or ethnicity, religious or philosophical beliefs, political opinions or trade union membership, genetic or biometric data, data about your sex life or sexual orientation. For example, if you take out an insurance policy with us through your trade union or provide information about certain medical treatments, this may allow conclusions to be drawn about your trade union membership or your religious beliefs.

## How we collect your personal data

We collect information directly from you:

- when you apply for or renew an insurance policy;
- when we make you an offer;
- when you contact us by e-mail, telephone or otherwise in writing or verbally; and
- when contacting our third-party providers by telephone (please note that these calls may be recorded).

We collect information not only directly from you, but also from:

- an applicant where you are named as a beneficiary or in an insurance policy.
- third parties involved in the application process (e.g. our business partners and agents, brokers or other insurers).
- publicly accessible sources such as the electoral register, court judgements, insolvency registers, internet search engines, news articles and social media sites.
- other companies in the Liberty Mutual Insurance Group.
- Credit reference agencies in the relevant jurisdictions.
- Investigation authorities for white-collar crime and insurance industry databases (e.g. for fraud prevention and verification in the event of international sanctions).

## What we use your personal data for

We use your personal data for various purposes. In each case, we require a legal basis for this. When processing your personal data, we rely on the following legal bases:

- We need your personal data in order to conclude an insurance contract with you or to fulfil the obligations arising from an insurance contract concluded with you. For example, we need to use your personal data to make you an offer.
- We are required by law or regulation to collect certain personal data. For example, our regulators require certain records of our dealings with you.
- We need to use your personal data for an overriding purpose (e.g. to record the decisions we make on different applications, to maintain business records, to conduct strategic business analyses, to review our business planning and development and to improve our products and services). When using your personal data for these purposes, we always take your rights and interests into account.

For the processing of particularly sensitive personal data, we require an additional legal basis and base our processing on the following legal bases:

- We require such particularly sensitive personal data for the assertion, exercise or defence of legal claims. This may be the case if we are confronted with legal proceedings, wish to take legal action ourselves or examine a legal claim by a third party against you.
- We require this particularly sensitive personal data for a justified purpose in the public interest based on a legal obligation (e.g. security check of email content for the purpose of recognising cyber threats).
- You have given us your consent to use your sensitive personal data (e.g. in connection with a claim). We may need your consent to process sensitive personal data (e.g. health information). Without this, we may not be able to offer you an insurance policy. We will always explain to you why your consent is required.

Purpose for processing	Legal grounds for the use of your personal data	Legal grounds for the use of your particularly sensitive personal data
<b>Evaluating potential customers, including conducting fraud, credit and anti-money laundering checks.</b>	<ul style="list-style-type: none"> <li>• Your personal data is required in order to conclude an insurance contract with you.</li> <li>• We have an overriding interest (assessment of the insurance application).</li> </ul>	<ul style="list-style-type: none"> <li>• There is a considerable public interest in preventing or uncovering unlawful acts (presumption of fraud)</li> <li>• We have to establish, exercise or defend legal claims.</li> <li>• You have given us your express consent.</li> </ul>
<b>Administration and processing of your insurance applications and enquiries.</b>	<ul style="list-style-type: none"> <li>• Your personal data is necessary in order to conclude or fulfil an insurance contract with you.</li> <li>• We have an overriding interest (assessment of the insurance application).</li> </ul>	<ul style="list-style-type: none"> <li>• We need your consent before we can offer you an insurance policy.</li> </ul>
<b>Improving the quality of our services, training and security (e.g. by recording or monitoring calls to our contact numbers or conducting customer satisfaction surveys).</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (development and improvement of the products and services we offer).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>
<b>To fulfil our legal or regulatory obligations.</b>	<ul style="list-style-type: none"> <li>• We need your personal data in order to fulfil our legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> <li>• We need your personal data in order to assert, exercise or defend legal claims.</li> </ul>
<b>Improvement of business and management processes and other activities (including analysis, review, planning, business development, IT hosting, support and security).</b>	<ul style="list-style-type: none"> <li>• We have a predominant interest (management of our business).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> <li>• We require your personal data in order to assert, exercise or defend legal claims.</li> <li>• There is an overriding public interest in the use of your personal data.</li> </ul>
<b>For insurance administration, including trend analyses, carrying out actuarial work, planning the provision of benefits, risk assessment, costs and fees.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (development and improvement of the products and services we offer).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>

### To whom we pass on your personal data

We will treat your personal data confidentially and only pass it on to the extent necessary for the above-mentioned purposes:

- other companies of the Liberty Mutual Insurance Group (within and outside the European Economic Area or Switzerland) and their service providers.
- Third parties involved in the administration of your application for an insurance policy. These include surveyors, appraisers and other experts.
- other insurers (e.g. if another insurer has previously offered you an insurance policy or processed a claim).
- Insurance brokers and other intermediaries.
- other insurers, reinsurers and companies that arrange such reinsurance.

- Credit reference agencies in the relevant jurisdictions.
- Third parties who carry out sanction checks.
- Insurance industry organisations and self-regulatory organisations, such as the Swiss Insurance Association (SIA) and the Association for Quality Assurance in Financial Services (VQF).
- Investigation authorities for white-collar crime and insurance industry databases (e.g. for fraud prevention and verification in the event of international sanctions).
- Our supervisory authorities, including the Swiss Financial Market Supervisory Authority FINMA.
- the police, tax authorities and customs administration as well as other institutions for crime prevention and investigation.
- Third party providers, agents and contractors engaged by Liberty Specialty Markets or the Liberty Mutual Group to assist us in the conduct of our day-to-day business activities, including IT providers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisors.
- selected third parties in connection with the sale, transfer or disposal of our company.
- any agent or representative acting on your behalf.
- any other person required to enter into an insurance contract with you. This is to protect us against risks or to ensure compliance with regulatory requirements or good corporate governance.

### 3.2 Policyholder or beneficiary of an insurance policy

If you take out an insurance policy with us (e.g. an art policy) or if you are listed as an applicant or beneficiary on an insurance policy that someone else has with us (e.g. a named director under a Directors & Officers policy), this section is relevant to you and describes how your personal data will be used.

#### What personal data we collect

- General information such as name, address, telephone number, e-mail address, date of birth and gender.
- Information about your relationship to the policyholder in whose insurance policy you are listed as a beneficiary.
- Identification information such as passport details, driving licence and national insurance number.
- Your bank and payment details.
- Information about your job (if required), such as job title, professional background and professional qualifications.
- Financial information about you that we have received as a result of credit checks, e.g. bankruptcy orders, debt-restructuring moratoria or court judgements.
- Information we receive in the course of sanctions list reviews, e.g. from the United Nations, European Union, Swiss State Secretariat for Economic Affairs, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.
- Information relevant to your insurance application, such as previous insurance policies and claims made. This also includes specific information relating to the insurance policy for which you are applying. For example, if you take out asset protection insurance, we will collect and use information about your property or if you have art insurance, we will collect and use information about your art or jewellery collection.
- Information (including photographic evidence) relevant to your insurance policy or claim. For example, if you make a claim for damage to your property, we may use information about your property or if you make a claim following a road traffic accident, we may use personal information about your vehicle and the driver.
- Information that we have collected from publicly accessible sources such as the electoral register, newspapers and social media sites.
- Other information provided by you, your insurance broker or any other person making a claim on your behalf.

#### Which particularly sensitive personal data we collect

- Details of your criminal convictions and related information. This includes information about offences you have committed or court judgments in which you are or have been a party or otherwise involved.
- Details of your physical and mental health that are relevant to your insurance policy or claim (e.g. if you are a pilot and take out or are covered by aviation insurance, we may require details of pre-existing medical conditions). This may be in the form of medical reports or underlying medical data such as x-rays or blood tests.
- We may also collect information relevant to your insurance policy or claim, such as data relating to race or ethnicity, religious or philosophical beliefs, political opinions or trade union membership, genetic or biometric data, data about your sex life or sexual orientation. For example, if you take out an insurance policy with us

through your trade union or provide information about certain medical treatments, this may allow conclusions to be drawn about your trade union membership or your religious beliefs.

## How we collect your personal data

We collect information directly from you:

- when you apply for or renew an insurance policy;
- when we make you an offer;
- if you make a claim under your insurance policy;
- if you contact us by e-mail, telephone or in any other form in writing or verbally;
- when contacting our third-party providers by telephone (please note that these calls may be recorded); or
- when you submit a complaint.

We collect information not only directly from you, but also from:

- the policyholder in whose insurance policy you are the beneficiary.
- Third parties involved in the relevant insurance policy or claim (e.g. our business partners and agents, brokers or other insurers, claimants, defendants or witnesses to an incident).
- Third parties who provide a service in connection with the respective insurance policy or application (e.g. claims adjusters, claims handlers and medical experts).
- publicly accessible sources such as the electoral register, court judgements, insolvency registers, internet search engines, news articles and social media sites.
- other companies in the Liberty Mutual Insurance Group.
- Third parties who carry out sanction checks.
- Insurance industry organisations and self-regulatory organisations, such as the Swiss Insurance Association (SIA) and the Association for Quality Assurance in Financial Services (VQF).
- Investigation authorities for white-collar crime and insurance industry databases (e.g. for fraud prevention and verification in the event of international sanctions).
- our supervisory authorities, including the Swiss Financial Market Supervisory Authority FINMA.
- the police, tax and customs authorities and other organisations involved in crime prevention and investigation.
- Third-party providers who support us in carrying out our day-to-day business activities, including IT providers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisors.
- selected third parties in connection with the sale, transfer or disposal of our company.

## What we use your personal data for

We use your personal data for various purposes. In each case, we must have a legal basis for doing so. When processing your personal data, we rely on the following legal bases:

- We use your personal data in order to conclude an insurance contract with you or to fulfil the obligations arising from an insurance contract concluded with you. For example, we use your personal data to provide you with a quote or to offer you an insurance policy and other related products (e.g. legal protection). We rely on this data to review your application, manage your insurance policy, process claims and offer other products.
- We are required by law or regulation to use certain personal data. For example, our regulators require certain records of our dealings with you.
- We need to use your personal data for a predominant purpose (e.g. to properly investigate incidents that are the subject of a complaint, to maintain business records, to conduct strategic business analyses, to review our business planning and to develop and improve our products and services). When using your personal data for these purposes, we always take your rights and interests into account.

For the processing of particularly sensitive personal data, we require an additional legal basis and base our processing on the following legal bases:

- We require such particularly sensitive personal data for the assertion, exercise or defence of legal claims. This may be the case if we are confronted with legal proceedings, wish to take legal action ourselves or examine a legal claim by a third party against you.

- We require this particularly sensitive personal data for a justified purpose in the public interest in accordance with a legal obligation (e.g. security checks of e-mail content for the purpose of detecting cyber threats).
- You have given us your consent to use your sensitive personal data (e.g. in connection with your claim). We may need your consent to process sensitive personal data (e.g. health information) because without it we may not be able to provide your insurance policy or process claims. We will always explain to you why your consent is necessary.

Purpose for processing	Legal grounds for the use of your personal data	Legal grounds for the use of your particularly sensitive personal data
<b>To evaluate customers, including carrying out fraud, credit and anti-money laundering checks on you.</b>	<ul style="list-style-type: none"> <li>• Your personal data is necessary in order to conclude an insurance contract with you or to fulfil an insurance contract.</li> <li>• We have an overriding interest (prevention of fraud and other white-collar crime).</li> </ul>	<ul style="list-style-type: none"> <li>• There is a significant public interest in preventing and detecting illegal activities (where we suspect fraud).</li> <li>• We must assert, exercise or defend legal claims.</li> <li>• You have given us your express consent.</li> </ul>
<b>Administration and processing of your insurance applications and enquiries.</b>	<ul style="list-style-type: none"> <li>• Your personal data is necessary in order to conclude or fulfil an insurance contract with you.</li> <li>• We have an overriding interest (assessment of your insurance application and administration of the application process).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent. In some cases, we need your consent before we can offer you an insurance policy.</li> </ul>
<b>Management of your claims under your insurance policy.</b>	<ul style="list-style-type: none"> <li>• Your personal data is necessary in order to conclude or fulfil your insurance contract.</li> <li>• We have an overriding interest (verification and payment of your claim and management of the claims process).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent. In some cases, we need your consent before we can pay your claim.</li> <li>• We need to use your personal data to assert, exercise or defend legal claims.</li> </ul>
<b>Prevention and investigation of fraud.</b>	<ul style="list-style-type: none"> <li>• Your personal data is necessary in order to conclude or fulfil an insurance contract with you.</li> <li>• We have an overriding interest (prevention and detection of fraud and other white-collar crime)</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent. In some cases, we need your consent before we can offer you an insurance policy.</li> <li>• We need your personal data in order to assert, exercise or defend legal claims.</li> </ul>
<b>To communicate with you and resolve any complaints.</b>	<ul style="list-style-type: none"> <li>• Your personal data is necessary in order to conclude or fulfil an insurance contract with you</li> <li>• We have an overriding interest (sending communications, recording and investigating complaints and ensuring that future complaints are dealt with appropriately).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> <li>• We need your personal data in order to assert, exercise or defend legal claims.</li> </ul>
<b>Improving the quality of our services, training and security (e.g. by recording and monitoring calls to our contact numbers or conducting</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (development and improvement of the products and services we offer).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>

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**customer satisfaction surveys).**

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<b>Improvement of business and management processes and other activities (including analysis, review, planning, business processing and IT hosting, support and security).</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to run our business successfully).</li> <li>• You have given us your express consent.</li> <li>• There is an overriding public interest in the use of your personal data.</li> </ul>
<b>For insurance administration, including analysing trends, carrying out actuarial work, planning the provision of benefits, risk assessment, costs and fees.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (development and improvement of the products and services we offer).</li> <li>• You have given us your express consent.</li> </ul>
<b>To apply for and make use of insurance.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to ensure that we have adequate insurance).</li> <li>• You have given us your express consent.</li> <li>• We need your personal data in order to assert, exercise or defend legal claims.</li> </ul>

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**To whom we pass on your personal data**

We will treat your personal data confidentially and only pass it on to third parties if this is necessary for the above-mentioned purposes:

- other companies of the Liberty Mutual Insurance Group (within and outside the European Economic Area or Switzerland) and their service providers.
- Third parties involved in the administration of the insurance contract or claim in question. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts, including medical experts.
- other insurers (e.g. if another insurer has previously offered you an insurance policy or processed a claim).
- Insurance brokers and other intermediaries.
- other insurers, reinsurers and companies that arrange such reinsurance.
- Credit reference agencies in the relevant jurisdictions.
- Third parties who carry out sanction checks.
- Insurance industry organisations and self-regulatory organisations, such as the Swiss Insurance Association (SIA) and the Association for Quality Assurance in Financial Services (VQF).
- Investigation authorities for white-collar crime and insurance industry databases (e.g. for fraud prevention and verification in the event of international sanctions).
- our supervisory authorities, including the Swiss Financial Market Supervisory Authority FINMA.
- The police, tax authorities and customs administration as well as other organisations for the prevention and investigation of crime.
- Third party providers, agents and contractors engaged by Liberty Specialty Markets or the Liberty Mutual Group to assist us in the conduct of our day-to-day business activities, including IT providers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisors.
- selected third parties in connection with the sale, transfer or disposal of our company.
- any agent or representative acting on your behalf.
- any other person necessary to enter into an insurance contract with you, to protect us against risks or to ensure compliance with regulatory requirements or good corporate governance.

**3.3 Third parties claimant**

If you are making a claim against someone who has an insurance policy with us, this section is relevant to you and sets out how we will use your personal data.

## What personal data we collect

- General information such as name, address, telephone number, e-mail address, date of birth and gender.
- Identification data such as passport details, driving licence and national insurance number.
- Your bank and payment details.
- Other financial data such as income and salary information
- If relevant to your claim, we may collect information about your position, such as job title, employment history and professional qualifications. We may also collect telematic data such as information about your driving habits.
- Information we receive in the course of sanctions list reviews, such as from the United Nations, European Union, Swiss State Secretariat for Economic Affairs, UK Treasury, U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.
- Information about previous insurance policies you have taken out and the claims you have made.
- Information (including photographic evidence) relevant to your claim. For example, if you make a claim for damage to your property, we may use information about your property, or if you make a claim following a road traffic accident, we may use personal information about your vehicle and the driver.
- Information that we have collected from publicly accessible sources such as the electoral register, newspapers and social media sites.
- Any other information disclosed by you, your representative or any other person making a claim on your behalf

## Which particularly sensitive personal data we

- Details of your criminal convictions and any related information. This includes information about offences you have committed or court judgements in which you are or have been a party or otherwise involved.
- Information about your physical and mental health that is relevant to your claim (e.g. because you have been injured by something we have insured). This may be in the form of medical reports or underlying medical data such as x-rays or blood tests.
- We may also collect other information relevant to your claim, such as data relating to race or ethnicity, religious or philosophical beliefs, political opinions or trade union membership, genetic or biometric data or data about your sex life or sexual orientation.

## How we collect your personal data

We collect information directly from you:

- if you assert a claim;
- if you contact us by e-mail, telephone or in any other form in writing or verbally;
- when contacting our third-party providers by telephone (please note that these calls may be recorded).
- when you submit a complaint.

We collect data not only directly from you, but also from:

- of the party that has an insurance policy with us.
- Third parties involved in the insurance policy or claim (such as our business partners and agents, brokers or other insurers, claimants, defendants or witnesses to an incident).
- third parties who provide a service in connection with the claim (e.g. loss adjusters, claims handlers and experts).
- Publicly accessible sources such as the electoral register, court judgements, insolvency registers, internet search engines, news articles, information on legal disputes and social media sites.
- other companies in the Liberty Mutual Insurance Group.
- Investigation authorities for white-collar crime and insurance industry databases (e.g. for fraud prevention and verification in the event of international sanctions).
- Private detectives (under certain circumstances).

## What we use your personal data for

We use your personal data for various purposes. In each case, we require a legal basis for this. When processing your personal data, we rely on the following legal bases:

- We are required by law or regulation to use certain personal data. For example, our regulators require us to keep certain records of our dealings with you.
- We need to use your personal data for a predominant purpose (e.g. to properly investigate incidents that are the subject of a complaint, to maintain business records, to conduct strategic business analyses, to review our business planning and to develop and improve our products and services). When using your personal data for these purposes, we always take your rights and interests into account.

For the processing of particularly sensitive personal data, we require an additional legal basis and base our processing on the following legal bases:

- We require such particularly sensitive personal data for the assertion, exercise or defence of legal claims. This may be the case if we are confronted with legal proceedings, wish to take legal action ourselves or if we are considering a claim against our policyholder.
- We require this particularly sensitive personal data for a justified purpose in the public interest in accordance with a legal obligation (e.g. security check of e-mail content to detect cyber threats).
- You have given us your consent to use your personal data. We may need your consent to process sensitive personal data (e.g. health information), without which we may not be able to process your claims. We will always explain to you why your consent is necessary.

Purpose for processing	Legal grounds for the use of your personal data	Legal grounds for the use of your particularly sensitive personal data
<b>Administration of claims.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (verification and payment of your claim and management of the claims process).</li> <li>• We need your personal data in order to fulfil our legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent. In some cases, we need your consent before we can pay your claim.</li> <li>• We need your personal data in order to assert, exercise or defend legal claims.</li> </ul>
<b>Prevention and investigation of fraud.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (prevention and detection of fraud and other white-collar crime).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent. In some cases, we need your consent before we can pay your claim.</li> <li>• We need your personal data in order to assert, exercise or defend legal claims.</li> </ul>
<b>To fulfil our legal or regulatory obligations.</b>	<ul style="list-style-type: none"> <li>• We need your personal data in order to fulfil our legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> <li>• We need your personal data in order to assert, exercise or defend legal claims.</li> </ul>
<b>Improving the quality of our services, training and security (e.g. by recording and monitoring calls to our contact numbers or conducting customer satisfaction surveys).</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (development and improvement of the products and services we offer).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>
<b>Improvement of business and management processes and other activities (including</b>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>

**analysis, review, planning, business processing and IT hosting, support and security).**

- There is an overriding public interest in the use of your personal data.

**Insurance administration including trend analysis, actuarial work, benefit planning, risk assessment and costs and charges.**

- We have an overriding interest (to run our business successfully).
- You have given us your express consent.

**Application for and utilisation of our own insurance.**

- We have an overriding interest (ensuring that we have adequate insurance).
- You have given us your express consent.
- We need your personal data in order to assert, exercise or defend legal claims.

**To whom we pass on your personal data**

We will treat your personal data confidentially and only pass it on to third parties if necessary for the above-mentioned purposes:

- other companies of the Liberty Mutual Insurance Group (within and outside the European Economic Area or Switzerland) and their service providers.
- Third parties involved in the administration of your claim, such as loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts including medical experts.
- other insurers (e.g. if another insurer is involved in a claim asserted by you).
- our insured policyholder,
- Insurance brokers and other intermediaries.
- other insurers, reinsurers and companies that arrange such reinsurance.
- Insurance industry organisations and self-regulatory organisations, such as the Swiss Insurance Association (SIA) and the Association for Quality Assurance in Financial Services (VQF).
- Third parties who carry out sanction checks.
- Investigation authorities for white-collar crime and insurance industry databases (e.g. for fraud prevention and verification in the event of international sanctions).
- Our supervisory authorities, including the Swiss Financial Market Supervisory Authority FINMA.
- the police, tax authorities and customs administration as well as other institutions for crime prevention and investigation.
- Third party providers, agents and contractors engaged by Liberty Specialty Markets or the Liberty Mutual Group to assist us in the conduct of our day-to-day business activities, including IT providers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisors.
- selected third parties in connection with the sale, transfer or disposal of our company.
- any agent or representative acting on your behalf.
- any other person whose co-operation is necessary to fulfil your insurance contract, to protect us against risks or to ensure compliance with regulatory requirements or good corporate governance.

**3.4 Witnesses to an incident**

If you are a witness to an incident that is the subject of a claim, this section is relevant to you and describes the use of your personal data.

**What personal data we collect**

- General information such as name, address, telephone number, e-mail address, date of birth and gender.
- Data relevant to the incident you have observed.

## Which particularly sensitive personal data we collect

It is not customary to collect sensitive personal data from accident witnesses. However, if you were involved in an accident and your personal data is transmitted to us (e.g. as part of a medical report), we may process your sensitive personal data.

## How we collect your personal data

We collect information not only directly from you, but also from:

- Third parties involved in the incident you observed (such as brokers or other insurers, claimants, defendants or other witnesses).
- other third parties who provide a service in connection with a claim relating to the incident you have observed (e.g. loss adjusters, claims handlers and experts).
- publicly accessible sources such as the electoral register, court judgements, insolvency registers, insurance industry databases, internet search engines, news articles and social media sites.
- other companies in the Liberty Mutual Insurance Group.

## What we use your personal data for

We use your personal data for various purposes. In each case, we require a legal basis for this. When processing your personal data, we rely on the following legal bases:

- We are required by law or regulation to use such personal data. For example, our regulators require certain records of our dealings with you.
- We need to use your personal data for an overriding purpose (e.g. to properly investigate incidents that are the subject of a complaint, to maintain business records, to conduct strategic business analyses, to review our business planning and to develop and improve our products and services). When using your personal data for these purposes, we always take your rights and interests into account.

For the processing of particularly sensitive personal data, we require an additional legal basis and base our processing on the following legal bases:

- We require such particularly sensitive personal data for the assertion, exercise or defence of legal claims. This may be the case if we are confronted with legal proceedings or wish to take legal action ourselves.
- We require this particularly sensitive personal data for a justified purpose in the public interest in accordance with a legal obligation (e.g. security checks of e-mail content for the purpose of detecting cyber threats).
- You have given us your consent to use your particularly sensitive personal data.

Purpose for processing	Legal grounds for the use of your personal data	Legal grounds for the use of your particularly sensitive personal data
<b>Investigation and administration of insurance claims.</b>	<ul style="list-style-type: none"> <li>• We have a predominant interest (verification and payment of claims and management of the claims process).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> <li>• We need your personal data in order to assert, exercise or defend legal claims.</li> </ul>
<b>Improvement of business and management processes and other activities (including analysis, review, planning, business processing and IT hosting, support and security).</b>	<ul style="list-style-type: none"> <li>• We have a predominant interest (to run our business successfully).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> <li>• There is an overriding public interest in the use of your data.</li> </ul>
<b>To fulfil our legal or regulatory obligations.</b>	<ul style="list-style-type: none"> <li>• We need your personal data in order to fulfil our legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>

		<ul style="list-style-type: none"> <li>• We need your personal data in order to assert, exercise or defend legal claims.</li> </ul>
<b>Prevention and investigation of fraud.</b>	<ul style="list-style-type: none"> <li>• We have a predominant interest (prevention and detection of fraud and other white-collar crime).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> <li>• We need your data in order to assert, exercise or defend legal claims.</li> </ul>

### To whom we pass on your personal data

We will treat your personal data confidentially and only pass it on to the extent necessary for the above-mentioned purposes:

- other companies in the Liberty Group.
- Third parties involved in the administration of an insurance policy or claim (e.g. loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts including medical experts).
- other insurers (e.g. if another insurer is also involved in the claim relating to the incident you have observed).
- Insurance brokers and other intermediaries.
- other insurers, reinsurers and companies that arrange such reinsurance.
- Insurance industry organisations and self-regulatory organisations, such as the Swiss Insurance Association (SIA) and the Association for Quality Assurance in Financial Services (VQF).
- Investigation authorities for white-collar crime and insurance industry databases (e.g. for fraud prevention and verification in the event of international sanctions).
- our supervisory authorities, including the Swiss Financial Market Supervisory Authority FINMA.
- The police, tax authorities and customs administration as well as other organisations for the prevention and investigation of crime.
- Third party providers, agents and contractors engaged by Liberty Specialty Markets or the Liberty Mutual Group to assist us in the conduct of our day-to-day business activities, including IT providers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisors.
- selected third parties in connection with the sale, transfer or disposal of our company.
- any agent or representative acting on your behalf.
- any other person whose co-operation is necessary to fulfil your insurance contract, to protect us against risks or to ensure compliance with regulatory requirements or good corporate governance.

### 3.5 Brokers, appointed representatives, suppliers and other business partners

If you are a broker who has a business relationship with us, an authorised representative or other business partner or provider, this section is relevant to you and describes how your personal data will be used.

#### What personal data we collect

- General information such as name, address, telephone number, e-mail address, date of birth and gender, languages spoken.
- Identification data such as passport details, driving licence and national insurance number.
- Information about your job, such as job title and previous positions.
- Log-in information, IP address, if you access one of our systems directly.
- Information we receive in the course of sanctions list reviews, such as from the United Nations, European Union, Swiss State Secretariat for Economic Affairs, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.
- Other information (including publicly available information) obtained in the course of our due diligence.
- If you attend one of our events, we may collect relevant information such as your special requests and dietary requirements.

## Which particularly sensitive personal data we collect

- Information about your criminal convictions (including criminal offences and alleged criminal offences as well as court judgments or unspent criminal convictions).
- If you attend one of our events, we may collect data about your specific dietary requirements, which may indicate your state of health or religious beliefs.
- In the event of an emergency, we may need to collect sensitive data about you, such as health information.

## How we collect your personal data

We collect data not only directly from you, but also from:

- Invoices, contracts, insurance policies, correspondence and business cards.
- other companies in the Liberty Mutual Insurance Group.
- publicly accessible sources such as Internet search engines.
- of service providers who carry out sanctions audits.
- Information is passed on to us by you (e.g. in emergencies) or by your employer

## What we use your personal data for

We use your personal data for various purposes. In each case, we require a legal basis for this. When processing your personal data, we rely on the following legal bases:

- We use your personal data in order to conclude a contract with you or to fulfil the obligations arising from a contract concluded with you. For example, we require certain information in order to utilise our business partnerships.
- We are legally or officially obliged to use such personal data. For example, certain background checks may be required.
- We need to use your personal data for an overriding purpose (e.g. to properly investigate incidents that are the subject of a complaint, to maintain business records, to conduct strategic business analyses, to review our business planning and to develop and improve our products and services). When using your personal data for these purposes, we always take your rights and interests into account.

For the processing of particularly sensitive personal data, we require an additional legal basis and base our processing on the following legal bases:

- We need your sensitive personal data for purposes related to an insurance policy or a claim and there is a substantial public interest in such use. This includes the verification of an insurance application, the administration of claims and the prevention and detection of fraud.
- We require such particularly sensitive personal data for the assertion, exercise or defence of legal claims. This may be the case if we are confronted with legal proceedings or wish to take legal action ourselves.
- We require this particularly sensitive personal data for a justified purpose in the public interest in accordance with a legal obligation (e.g. security checks of e-mail content for the purpose of detecting cyber threats).
- You have given us your consent to use your particularly sensitive personal data.
- We need to use your sensitive personal data in an emergency, example to prevent serious physical harm to you

Purpose for processing	Legal grounds for the use of your personal data	Legal grounds for the use of your particularly sensitive personal data
<b>Improvement of business and management processes and other activities (including analysis, review, planning, business processing and IT hosting, support and security).</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to run our business successfully).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> <li>• There is an overriding public interest in the use of your personal data.</li> </ul>

<b>To fulfil our legal or regulatory obligations</b>	<ul style="list-style-type: none"> <li>• We need your personal data in order to fulfil our legal obligations.</li> <li>• You have given us your express consent.</li> <li>• We require your personal data in order to assert, exercise or defend legal claims.</li> </ul>
<b>Conclusion of insurance contracts and claims processing.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (concluding insurance contracts and managing claims).</li> <li>• You have given us your express consent.</li> <li>• We need to use your data to establish, exercise or defend legal rights</li> <li>• Such use is required for insurance purposes.</li> </ul>
<b>Business development and maintenance of customer relationships.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (customer relationship management and business analysis).</li> <li>• You have given us your express consent.</li> </ul>
<b>Improving the quality of our services, training and security (e.g. through recorded or monitored calls to our contact numbers).</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (development and improvement of the products and services we offer).</li> <li>• You have given us your express consent.</li> </ul>
<b>Managing and responding to your enquiries.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (running our business and responding to enquiries).</li> <li>• Your personal data is necessary in order to conclude or fulfil a contract with you.</li> <li>• You have given us your express consent.</li> </ul>
<b>Administration of insurance policies, including analysing trends, carrying out actuarial work, planning the provision of benefits, risk assessment, costs and fees.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (development and improvement of the products and services we offer).</li> <li>• You have given us your express consent.</li> <li>• We need to use your data to establish, exercise or defend legal rights</li> <li>• Such use is required for insurance purposes.</li> </ul>
<b>Protection in the event of an emergency</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to protect your vital interests or those of another person).</li> <li>• We have an overriding interest (to protect your vital interests or those of another person).</li> </ul>

### To whom we pass on your personal data

We will treat your personal data confidentially and only pass it on to the extent necessary for the above-mentioned purposes:

- our policyholders and other third parties, such as claimants (if necessary).
- other companies in the Liberty Mutual Insurance Group.
- Third parties involved in the administration of an insurance policy or claim (e.g. loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts, including medical experts).
- our insurance partners, such as other brokers and insurers.
- other insurers, reinsurers and companies that arrange such reinsurance.
- Third parties who carry out sanction checks.
- Investigating authorities for white-collar crime and third parties operating fraud investigation registers.

- Our supervisory authorities, including the Swiss Financial Market Supervisory Authority FINMA.
- The police, tax authorities and customs administration as well as other organisations for the prevention and investigation of crime.
- Third party providers, agents and contractors engaged by Liberty Specialty Markets or the Liberty Mutual Group to assist us in the conduct of our day-to-day business activities, including IT providers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisors.
- selected third parties in connection with the sale, transfer or disposal of our company.
- any agent or representative acting on your behalf.
- any other person whose co-operation is necessary to fulfil your insurance contract, to protect us against risks or to ensure compliance with regulatory requirements or good corporate governance.
- Any person who is absolutely necessary to protect you in emergencies such as life-threatening situations.

### **3.6 Users of the Liberty Specialty Markets website or platforms and event participants**

If you are a user of the Liberty Specialty Markets website (or any platform linked to in this Privacy Notice), this section is relevant to you and describes how we use your personal data.

#### **What personal data we collect**

- General information that is transmitted via the website or platform, e.g. when you enter your personal data in the contact form, such as your name, contact details and company name.
- Information we receive through the use of cookies. You can find more information on this in our cookie policy in the "Cookies" section below.
- Information that we receive through a registration form for an event or promotion.

#### **Which particularly sensitive personal data we collect**

We do not expect to collect any sensitive personal data via the website. However, we may collect special dietary requirements for an event or you may send us sensitive personal data through an enquiry or complaint.

#### **How we collect your personal data**

- We collect your personal data directly from our website or a platform that redirects you to our website.
- Our websites may also collect personal data to uniquely identify your device, such as IP addresses.

#### **What we use your personal data for**

We use your personal data for various purposes. In each case, we require a legal basis for this. When processing your personal data, we rely on the following legal bases:

- We use your personal data in order to conclude an insurance contract with you or to fulfil the obligations arising from an insurance contract concluded with you. For example, we use your personal data to respond to a request for a quote.
- We are required by law or regulation to use such personal data. For example, our regulators require certain records of our dealings with you.
- We need to use your personal data for an overriding purpose (e.g. to monitor the number of visitors to our website, to keep business records and to develop and improve our products and services). When using your personal data for these purposes, we always take your rights and interests into account.

For the processing of particularly sensitive personal data, we require an additional legal basis and base our processing on the following legal bases:

- We use your sensitive personal data for purposes related to an insurance policy or claim and there is a substantial public interest in the use of your personal data. This includes the verification of an insurance application, the administration of claims and the prevention and detection of fraud.

- We use your particularly sensitive personal data for the assertion, exercise or defence of legal claims. This may be the case if we are confronted with legal proceedings or wish to take legal action ourselves.
- You have given us your consent to use your particularly sensitive personal data (e.g. in relation to your marketing preferences).

Purpose for processing	Legal grounds for the use of your personal data	Legal grounds for the use of your particularly sensitive personal data
<b>Your registration as a user of the website (including the recording of information on our server logs from your browser, your IP address and the page you requested).</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to enable you to use the website and to ensure its proper functionality).</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<b>Answering your enquiries.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (answering your enquiry).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>
<b>Provision of marketing information.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (sending selected communications about products and services that we offer).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>
<b>To give you the opportunity to apply for a job advertisement and for the subsequent processing of your application.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to ensure that your application is processed).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>
<b>Registration and organisation of events.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (so that you can register for the event).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>
<b>Storage of your data in our customer relationship management systems.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to improve our business relationship with you).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>

### To whom we pass on your personal data

We will keep your personal data confidential and will only share it with other Liberty Mutual Insurance Group companies, our agents or contractors if this is necessary for the above purposes.

### 3.7 Prospective job applicants

If you are applying for a job with us, this section is relevant to you and describes how your personal data will be used.

#### What personal data we collect

- General information such as name, address, telephone number, e-mail address, date of birth and gender.
- Information about your job, such as job title and previous positions.
- Information about your right to work.
- Other information (including publicly available data) that we have obtained as part of our due diligence, where this information is necessary to assess your suitability for the role.

## Which particularly sensitive personal data we collect

- Information about your criminal convictions, insofar as this information is necessary to assess your suitability for the position.
- In the event that you attend events with us, we may collect information about specific dietary requirements. If your CV includes trade union memberships, this information will be collected where this information is necessary to assess your suitability for the role.

## How we collect your personal data

We do not only collect information directly from you, but your personal data may also come from service providers such as a recruitment consultancy firm commissioned by you.

Note: If you send us your CV or unsolicited application by e-mail, we will store this data in our recruitment portal for 6 months, unless you object to this.

## What we use your personal data for

We use your personal data for various purposes. In each case, we require a legal basis for this. When processing your personal data, we rely on the following legal bases:

- We use your personal data to conclude an employment contract with you or to fulfil an existing employment contract. For example, we need certain information in order to make you an offer.
- We are legally or officially obliged to use such personal data. For example, it may be necessary to carry out certain background checks.
- We must use your personal data for a legitimate purpose (e.g. to assess your suitability for the position). When using your personal data for these purposes, we always take your rights and interests into account.

For the processing of particularly sensitive personal data, we require an additional legal basis and base our processing on the following legal bases:

- We use this particularly sensitive personal data for a justified purpose in the public interest in accordance with legal obligations (e.g. security checks of email content to detect cyber threats).
- You have given us your consent to use your particularly sensitive personal data.

Purpose for processing	Legal grounds for the use of your personal data	Legal grounds for the use of your particularly sensitive personal data
<b>Improvement of business and management processes and other activities (including analysis, review, planning, business processing and IT hosting, support and security).</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to run our business successfully).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> <li>• There is an overriding public interest in the use of your personal data.</li> </ul>
<b>To fulfil our legal or regulatory obligations.</b>	<ul style="list-style-type: none"> <li>• We use your data to fulfil our legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> <li>• We need your personal data in order to assert, exercise or defend legal claims.</li> </ul>
<b>To process and respond to your enquiry.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to run our business successfully and respond to enquiries).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>

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	<ul style="list-style-type: none"> <li>• We use your personal data to conclude or fulfil a contract with you.</li> </ul>	
<b>Administration of the application process.</b>	<ul style="list-style-type: none"> <li>• We have a predominant interest (employee search).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent.</li> </ul>

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### To whom we pass on your personal data

We will treat your personal data confidentially and only pass it on to the extent necessary for the above-mentioned purposes:

- other companies of the Liberty Mutual Insurance Group (within and outside the European Economic Area or Switzerland) and their service providers.
- Third parties involved in hosting, analysing and providing recruitment services.
- Credit reference agencies in the relevant jurisdictions where this information is required to assess your suitability for the role.
- Our supervisory authorities, including the Swiss Financial Market Supervisory Authority FINMA.
- The police, tax authorities and customs administration as well as other organisations for the prevention and investigation of crime.
- Third party providers, agents and contractors engaged by Liberty Specialty Markets or the Liberty Mutual Group to assist us in the conduct of our day-to-day business activities, including IT providers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisors.
- selected third parties in connection with the sale, transfer or disposal of our company.
- any agent or representative acting on your behalf.
- selected third-party providers who provide and manage our recruitment portals (in the USA).

### 3.8 External visitors to our offices

If you visit one of our offices, this section is relevant to you and describes how we use your personal data.

#### What personal data do we collect?

- General information such as your name, address, telephone numbers and e-mail addresses.
- Information about your job, e.g. your job title and the reason for your visit to the office.

#### What sensitive personal data do we collect?

- In emergencies, it may be necessary for us to use your sensitive personal data.

#### How will we collect your information?

- As a rule, we receive the information directly from you.

#### What will we use your personal data for?

We may use your personal data for a number of purposes. In each case, we must have a "legal ground" for doing so. We rely on the following "legal grounds" when we process your "personal data":

- We need to use your personal data to record your access for security reasons.
- We are required by law or regulation to use this personal data. For example, we may be required to comply with health and safety laws and regulations.

If the information we process is categorised as "sensitive personal data", we must have an additional "legal ground". We rely on the following legal grounds when we process your "sensitive personal data":

- We must use such special category data to protect vital interests (overriding interest).
- You have given us your consent to use your sensitive personal data.

Purpose for processing	Legal grounds for the use of your personal data	Legal grounds for the use of your particularly sensitive personal data
<b>For corporate management</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to effectively manage our business and ensure secure access to our premises).</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<b>To fulfil our legal or regulatory obligations.</b>	<ul style="list-style-type: none"> <li>• We use your data to fulfil our legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• We need to use your data to ensure the health and safety of our premises</li> </ul>
<b>For protection in an emergency.</b>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to protect your vital interests or those of another person).</li> </ul>	<ul style="list-style-type: none"> <li>• We have an overriding interest (to protect your vital interests or those of another person).</li> </ul>

### To whom will we disclose your personal data?

We treat your personal data confidentially and only pass it on to the following parties if this is necessary for the above-mentioned purposes:

- Other Liberty Mutual Insurance Group companies (both inside and outside the European Economic Area) and their service providers.
- Third parties that provide security services.
- The emergency services and other public facilities.
- Any agent or representative acting on your behalf.

### 3.9 Children

In the course of providing our products and services, we may in a limited number of cases process personal data of persons under the age of eighteen. This may be the case, for example, where a child's data is shared with us as part of an insurance claim. We have created a specific privacy policy to help children understand our collection and use of their personal data, which you can view [here](#).

### 3.10 Whistleblowing

You can report a concern on an anonymous or non-anonymous basis. If your report is not anonymous, we will process your personal data to investigate your report and fulfil our obligations under applicable whistleblowing laws and regulations.

### What personal data will we collect?

If you provide us with this information as part of your report, we may process the following:

- General information such as your name, telephone numbers and e-mail addresses.
- Information about your activity, e.g. job title and company.
- Any other information you provide to us on the application form.

## What sensitive personal data do we collect?

- As a rule, we do not collect special categories of personal data and/or information on criminal convictions and offences unless you provide us with such information as part of your report.
- Any other sensitive information you provide to us on the form.

## How will we collect your information?

- We will collect information from you or, where appropriate, as part of our investigation.

## What will we use your personal data for?

The data will be used by us to fulfil our obligations under whistleblowing laws and regulations.

Purpose for processing	Legal grounds for the use of your personal data	Legal grounds for the use of your particularly sensitive personal data
<b>To fulfil our legal or regulatory obligations.</b>	<ul style="list-style-type: none"> <li>• We must use the data transmitted in order to fulfil our legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your express consent (if this is the case)</li> <li>• The processing is necessary for the fulfilment of the obligations and the exercise of certain rights of the controller or the data subject in the area of employment</li> <li>• We must use the information provided to establish, exercise or defend legal claims.</li> <li>• Processing is necessary for reasons of important public interest</li> </ul>

## To whom will we disclose your personal data?

We handle your personal data in accordance with our Whistleblowing Policy, which provides a secure and confidential mechanism for individuals who wish to report concerns or misconduct.

- Internal interest groups
- Other companies in the Liberty Mutual Insurance Group
- External legal advisors and other suppliers in connection with the necessary investigations
- Supervisory or law enforcement authorities to whom the reports or results of the investigation may need to be communicated
- Financial crime and fraud investigation agencies and other third parties that operate and maintain a fraud investigation register
- Any agent or representative working for you

If you have any questions or concerns about our whistleblowing policy or the processing of your personal data, please do not hesitate to contact our Data Protection Officer as indicated in section 10 "Contact details".

## 4. What marketing and/or profiling activities do we carry out?

### Marketing activities:

Marketing communications are sent exclusively to our business contacts. This can be done by post, e-mail or telephone.

In any case, we will give you the opportunity to unsubscribe. You can unsubscribe at any time by contacting us as described in section 10.

## Profiling:

Profiling is an integral part of the insurance offer. We assess the risk you wish to insure (e.g. the risk of your home being damaged by a flood) against the likelihood of this event occurring (e.g. based on the geographical location of your property and the history of flooding in the region). We use this profiling when deciding whether or not to offer you insurance, on what terms and at what price.

In carrying out the necessary due diligence checks (e.g. sanctions checks) on our business partners, potential customers and others with whom we may do business, we may need to share a limited amount of your data with third party providers who assist us in this process. Their processing may include an element of profiling. We do not make automated decisions based on this processing.

While we use profiling to support our decisions, a member of our team always makes a decision, taking into account the profiling result and other relevant facts.

## 5 How long do we store personal data?

We will retain your personal data for as long as necessary to fulfil the purposes set out in section 3 and to comply with our legal and regulatory obligations.

We have a detailed retention policy which sets out how long we keep different types of personal data. The exact period depends, for example, on your relationship with us and the type of personal data we hold:

- If we make an offer for an insurance policy, we will keep the relevant information for 36 months unless this offer is accepted by you.
- If you make a claim under one of our insurance policies, we will keep your personal data for 10 years after the conclusion of the insured event.

If you would like further information about the periods for which your personal data will be retained, please contact us using the details set out in section 10.

## 6 How do we proceed to transfer your personal data abroad?

Sometimes we (or third parties acting on our behalf) transfer personal data that we collect about you to countries outside the European Economic Area ("EEA").

When data is transferred, we will take measures to ensure that your personal data is protected. We do this by means of a number of measures, including

- the conclusion of corresponding contracts. We process a set of contractual texts, so-called "standard data protection clauses", which have been approved by the data protection authorities.

Depending on your relationship with us and your individual case, we may transfer personal data anywhere in the world. For example, if you have an accident policy with us and are injured, we may instruct medical professionals or other service providers in the country where you were injured. The following is a summary of our regular data transfers to countries outside the EEA:

Recipient country	Reason for transferring data	How we protect your data
<b>United States and United Kingdom</b>	<ul style="list-style-type: none"> <li>• Transmission to Liberty Mutual Group companies in the US - communications to our parent company, IT support and hosting, centralised business functions in the US and UK</li> </ul>	<ul style="list-style-type: none"> <li>• Application of high IT security standards and standard data protection clauses.</li> </ul>

<b>United States and United Kingdom</b>	<ul style="list-style-type: none"> <li>Transmission to service providers to enable us to operate our business.</li> </ul>	<ul style="list-style-type: none"> <li>Supplier due diligence obligations, contracts, audits and standard data protection clauses.</li> </ul>
<b>India</b>	<ul style="list-style-type: none"> <li>Transmission to service providers to enable us to operate our business.</li> </ul>	<ul style="list-style-type: none"> <li>Supplier due diligence obligations, contracts, audits and standard data protection clauses.</li> </ul>
<b>Dubai</b>	<ul style="list-style-type: none"> <li>Liberty Specialty Markets MENA Limited is a Liberty Specialty Markets company registered with the Dubai International Financial Centre.</li> </ul>	<ul style="list-style-type: none"> <li>Application of IT security standards and standard data protection clauses.</li> </ul>
<b>Brazil, Colombia and China</b>	<ul style="list-style-type: none"> <li>Service providers need to access certain applications to analyse risks and process policies.</li> </ul>	<ul style="list-style-type: none"> <li>Application of IT security standards and standard data protection clauses.</li> </ul>

If you would like more information about our data transfers and the steps we take to protect your personal data, please contact us using the details set out in section 10.

## 7. How do we protect your personal data?

Liberty Specialty Markets takes the security of your data very seriously. We use appropriate technical, organisational and physical safeguards to protect the personal data we process in accordance with customer instructions and in compliance with our legal and regulatory obligations. The security measures on our website and computer systems are designed to prevent the loss, misuse or alteration of the information you provide to us. We will only retain your personal data for as long as is necessary for the purpose for which it was collected or to fulfil any applicable legal or ethical reporting or retention obligations.

The Liberty Mutual Group has a number of information security standards that apply depending on the type of data and where it is stored. These standards include access controls, encryption, network and host security, physical security, data recovery and business continuity. Our standards change from time to time in response to market developments and changing regulatory requirements.

Because emails sent through this website are not protected by the same security measures we use in other areas where we actively collect information, you should take extra care when deciding what information you wish to send us by email.

In the event that you become aware of any actual or potential misuse of such information, or for further information on IT security, please contact us using the details set out in section 10.

## 8. Your rights

Under the Data Protection Act, you have a number of rights in relation to the personal data we hold about you. You can exercise your rights by contacting us at any time. Such requests are usually free of charge.

Please note that although we take your rights seriously, there may be circumstances where we are unable to comply with your request, for example if we are unable to fulfil our own legal or regulatory obligations. In such cases, we will let you know why we are unable to fulfil your request.

In certain circumstances, fulfilling your request may result in your insurance policy being cancelled or your claim being discontinued. For example, if you request the cancellation of your personal data, we will not have the necessary information to process your claim. We will inform you of this when you make your request.

- Right to information**

You are entitled to a copy of the personal data we hold about you and certain information about how we use it.

As a rule, we will provide you with your personal data in writing, unless you request otherwise. If your request was made electronically (e.g. by e-mail), we will provide you with a copy of your personal data electronically if possible.

- **Right to rectification**

We take reasonable steps to ensure that the personal data we hold about you is accurate and, where possible, up to date and complete. If you believe that there are inaccuracies, inconsistencies or omissions in the information we hold about you, you can contact us and ask us to update or amend it.

- **Right to restriction of processing**

In certain circumstances, you are entitled to ask us to stop using your personal data, for example if you believe that the personal data we hold about you is inaccurate or that we no longer need your personal data.

- **Right to object**

If we rely on your consent to process your personal data, you have the right to withdraw this consent to the further use of your personal data.

Please note that in some cases we will need your consent to issue your insurance policy. If you withdraw your consent, we may have to cancel your insurance policy or we may not be able to pay your claim. We will advise you of this when you withdraw your consent.

- **Right to cancellation**

This is sometimes referred to as the "right to be forgotten". You are entitled to request the deletion of your personal data under certain circumstances. For example, if we no longer need your personal data for the original purpose for which we collected it or if you have exercised your right to cancellation.

We will check every enquiry you make, but we cannot delete your personal data, for example, if we have a legal obligation to retain it.

- **Right to object in connection with direct marketing**

*Direct marketing:* You have control over the amount of marketing we do to you and you have the right to ask us to stop sending you marketing at any time. You can do this either by clicking the "unsubscribe" button in any email we send you or by contacting us using the details in section 10.

Please note that even if you exercise this right, we may still send you service-related messages.

*Processing on the basis of our overriding interests:* If we process your personal data on the basis of our overriding interests, you can object to our processing. We will review your objection and determine whether or not our overriding interests affect your data protection rights.

- **Right to data portability**

Under certain circumstances, you may request that we transfer personal data that you have provided to us to third parties.

- **Rights in connection with automated decision-making**

We do not carry out automated decision-making. Should this change in the future, we will provide you with an updated notice describing our decision-making process.

- **Complaint to a supervisory authority**

You have the right to lodge a complaint with the Federal Data Protection and Information Commissioner (FDPIC) or another local data protection authority if you believe that we have breached the applicable data protection laws when processing your personal data.

For more information, please visit the FDPIC's website (<https://www.edoeb.admin.ch/edoeb/de/home.html>). Submitting a complaint does not affect your other legal rights or remedies.

## 9. Cookies

By accessing and using this website, you consent to the use of cookies by Liberty Specialty Market.

Cookies are small files with letters and numbers that Liberty Specialty Markets places on your computer if you allow this.

After your visit to the website, cookies save, for example, the language selection you have made for the website.

Cookies also allow us to recognise and count the number of visitors and to see how visitors move around the website.

Some cookies are required to give you access to the website and to make your browsing experience more user-friendly.

This website may contain links to third party websites (including websites of other companies within the Liberty Mutual Insurance group) which may use cookies over which we have no control. We recommend that you check the privacy policies of these websites regarding the use of cookies.

You can set your web browser to reject or delete cookies or to inform you when a cookie is set. You can find out how this works in the "Help" section of the menu bar of most Internet browsers. You can delete and block all cookies. If you do this, our website may not function correctly and you may not be able to access certain areas. You can find more information about cookies and how to delete them at <http://www.allaboutcookies.org/>.

If you would like to find out more about the cookies we use, [click here](#).

## 10. Contacting Us

If you would like further information on any of the matters set out in this Privacy Notice or have any other questions about the collection, storage or use of your personal data, you can contact our Data Protection Officer by email [atdataprotectionofficer@libertyglobalgroup.com](mailto:atdataprotectionofficer@libertyglobalgroup.com) or by writing to Data Protection Officer, Liberty Specialty Markets, 20 Fenchurch Street, London, EC3M 3AW or [click here](#).

Please note that we are not responsible for the privacy notices or the content of web pages originating from other websites linked to this website (including other companies within the Liberty Mutual Insurance Group).

## 11. Updating this data protection notice & cookies policy

From time to time, we have to make changes to this privacy policy, e.g. due to changes in the law, new technologies or other developments. We will always provide you with the latest data protection information, which you can find here on our website.

This privacy policy was last updated on 22/12/2025.