Liberty Specialty Markets takes the protection of your personal data seriously and is committed to protecting your privacy. This Privacy Notice sets out details of the information that we may collect from you and how we may use that information. Please take your time to read this notice carefully. When using a Liberty Specialty Markets website, this notice should be read alongside the website terms and conditions.

1. About Liberty Specialty Markets

Liberty Specialty Markets is an international insurance company. We offer insurance to individuals, businesses and other insurers.

In order for us to provide you with insurance services, i.e. to provide you with a quote and then insurance, and to deal with any claims or complaints, we need to collect and process data. We also collect your information for recruitment purposes, as part of our contractual relationship with you and for developing our relationship where appropriate. We are therefore a "data controller".

Liberty Specialty Markets includes a number of data controllers depending on the interaction you have with us or the policy you have taken out.

- If you contact us for recruitment purposes, Liberty Specialty Markets Limited and/or Liberty Specialty Markets Europe Sarl will be responsible for processing your personal data.
- If you are a broker, customer, supplier, contractual counterparty or other third party, one of the following will be responsible for processing 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.

Any documentation you receive may one of our trade names, including Liberty Specialty Markets, Liberty Mutual Reinsurance, Global Transaction Solutions or Liberty Mutual Surety.

The specific company responsible for processing your personal data will be mentioned in the documentation we provide.

If you are a customer residing in California, please see the relevant additional privacy notice here.

If you are not sure who is responsible for processing your personal data, you can also contact us at any time by emailing dataprotectionofficer@libertyglobalgroup.com or by writing to the Data Protection Officer, Liberty Specialty Markets, 20 Fenchurch Street, London, EC3M 3AW.

2. About the insurance market

Insurance involves the use and disclosure of your personal data by various players in the insurance market such as intermediaries, insurers and reinsurers. The London Insurance Market Core Uses Information Notice sets out these necessary core uses and disclosures of personal data. Our core uses and disclosures comply with the London Insurance Market Core Uses Information Notice. We recommend that you consult this notice (by clicking on the link above).

3. Our processing of your personal data and special category data?

The types of personal data we collect and how we use it depend on our relationship with you. For example, we will collect different personal data depending on whether you are a policyholder, policy beneficiary, claimant, witness, broker, prospective employee or other third party.

We may request or receive "sensitive personal data" (i.e. information relating to your health, genetic or biometric data, criminal convictions, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership). For example, we may need access to information about your health in order to provide you with a quotation, to offer you an insurance policy or to deal with any complaints you may have. We may also information about your outstanding criminal convictions for fraud prevention purposes.

This notice sets out the legal basis on which we may process your personal data and special category data. The requirements for processing special category data vary from jurisdiction to jurisdiction. For example, in England we may process special category data where necessary to provide you with insurance services. In other jurisdictions, we need your explicit consent. Where the tables below indicate that special category data will be processed for the purpose of providing insurance services, this will only apply to our data controllers subject to English, Irish, Dutch or Spanish law (this will be clear from the documentation provided to you).

Where the provision information is legally or contractually required, we will inform you of this at the time of collection.

Where you provide us with personal data about other people (for example, members of your family), we are also responsible for processing their personal data. You should refer them to this notice before providing data to us on behalf of others.

We may modify personal data in such a way that you cannot be identified from that data, either on its own or when combined with other data held by us. Such data will then not be subject to this notice or the Data Protection Act.

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

3.1. Prospective policyholders or beneficiaries

If you are applying for an insurance policy, or if someone else (such as a family member or your employer) is applying for an insurance policy from which you benefit, this section applies 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, date of birth and gender.
- Information on your relationship to the policyholder if you are the beneficiary.
- Identification information such as passport details, driving licence and national insurance number.
- Your bank and payment details.
- Where applicable, information about your job, such as job title, work history and professional accreditations.
- Any financial information about you that we have obtained as a result of credit checks, such as bankruptcy orders, individual voluntary arrangements or national court judgements.
- Information we obtain in the course of monitoring sanctions lists, such as those published by the United Nations, the European Union, the UK Treasury, the US Office of Foreign Assets Control (OFAC) and the Bureau of Industry and Security of the US Department of Commerce.
- Any information relevant to your insurance application, such as previous insurance policies you have held and claims you have made. This will also include any information specific to the type of policy you are applying for, for example, if you are applying for a fine art policy we may collect and use information relating to your art collection.
- Information we have collected from public sources such as electoral rolls, newspapers and social media sites.
- Any other information provided by you, your insurance broker or any other person applying on your behalf.

What sensitive personal data do we collect?

- Details of your criminal convictions and any related information. This includes information relating to offences or suspected offences that you have committed or convictions against you.
- Information about your physical and mental health that is relevant to your application (for example, if you take out or are covered by an individual accident insurance policy, we may information about pre-existing health conditions). This may include medical reports or underlying medical data such as X-rays or blood tests.
- We may also collect information that reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, genetic or biometric data, or data relating to your sex life or sexual orientation, it is relevant to your application insurance. For example, we may process information relating to your trade union membership if you take out a policy with us through your trade union body, as we may determine that you are a member of a trade union or if you specify certain medical treatments, this could indicate your religious beliefs.

How do we collect your personal data?

We will collect information directly from you:

- when you take out or renew a policy ;
- when we provide you with a quote;
- when you contact us by e-mail, telephone or other means of written or verbal communication; and
- when you contact our third-party administrators by telephone (please note that call recording may be used).

In addition to the information you provide directly to us, we collect information :

- The claimant when you are a beneficiary or designated under an insurance policy ;
- third parties involved in the insurance application process (such as our business partners and representatives, brokers or other insurers).
- Publicly available sources such as electoral rolls, court decisions, insolvency registers, internet search engines, press articles and social media sites.
- Other Liberty Mutual Insurance group companies.
- The credit reference agencies in the relevant jurisdictions, e.g. CallCredit, Equifax and Experian are the UK credit reference agencies.
- Financial crime detection agencies and insurance industry databases (including fraud prevention and international sanctions monitoring), including the Claims Underwriting Exchange (known as "CUE") run by IDS and the Motor Insurance Anti-Fraud and Theft Register run by the Association of British Insurers.

What do we use your personal data for?

We may use your personal data for a number of different purposes. In each case we must have a "lawful reason" for doing so. We will rely on the following "lawful grounds" when processing your "personal data":

- We need use your personal data to enter into or perform insurance contract we have with you. For example, we need to use your personal data to provide you with a quote.
- We have a legal or regulatory obligation to use this personal data. For example, our regulators require us to keep certain documents relating to our relationship with you.
- We need use your personal data for a legitimate interest (for example, to keep a record of the decisions we make when different types of requests are made, to keep business records, to carry out strategic business analysis, to review our business planning and to develop and improve our products and services). When we use your personal data for these purposes, we will always take account of your rights and interests.

Where the information we process qualifies as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when processing your "sensitive personal data":

- We need use your sensitive personal data for purposes relating to an insurance policy or claim and there is a substantial public interest in such use. These include assessing your insurance , managing claims and preventing and detecting fraud.
- We need to use sensitive personal data to establish, exercise or defend legal claims. This may happen when we are faced with legal proceedings or want to initiate legal proceedings ourselves, or when we are investigating legal action brought by a third party against you.

- We need to use this special category data for a justifiable public interest reason based on a legal obligation (for example, security analysis of email content to detect cyber threats).
- You have given your consent for us to use your sensitive personal data (for example, in connection with your claim compensation). In certain circumstances, we may need your consent to process sensitive personal data (for example, health information). Without this consent, we may not be able to offer you an insurance policy. We will always explain why your consent is required.

Purpose for processing	Legitimate reasons for using your personal data	Legitimate reasons for using your sensitive personal data
Assessing potential customers, including fraud, credit and anti-money laundering checks.	• It is necessary to conclude your insurance contract. • We have a legitimate interest (to assess the insurance application).	• It is in the public interest to prevent or detect illegal acts (when we suspect fraud). • This use is necessary for insurance purposes. • We need establish, exercise or defend legal rights • You have given us your explicit consent.
To manage and process your insurance application and queries.	• It is necessary for the conclusion or performance of your insurance contract. • We have a legitimate interest (to assess the insurance application).	• You have given us your express consent. We will need your consent before we can provide you with your insurance policy. • This use is necessary for insurance purposes.
Improve quality, training and safety (for example, by recording or monitoring telephone calls to our contact numbers, or by carrying out customer satisfaction surveys).	• We have a legitimate interest (to develop and improve the products and services we offer).	• You have given us your explicit consent
Comply with our legal and regulatory obligations.	• We need use your information to comply with our legal obligations.	• You have given us your explicit consent. • We need use your information establish, exercise or defend legal claims.
For business and management processes and activities including analysis, review, planning, business transactions and IT hosting, support and security.	• We have a legitimate interest (to run our business efficiently).	• You have given us your explicit consent. • We need use your information establish, exercise or defend legal claims. • This use is necessary for an important public interest
For insurance management purposes, including trend analysis, actuarial work, service delivery planning, risk assessment and costs and expenses.	• We have a legitimate interest (to develop and improve the products and services we offer).	• You have given us your explicit consent.

With whom do we share your personal data?

We will keep your personal data confidential and will only share it as necessary for the purposes described above with the following parties:

- Other Liberty Mutual Insurance Group companies (inside and outside the European Economic Area) and their service providers.
- Third parties involved in the administration of your insurance claim. This includes surveyors, valuers and other experts.
- Other insurers (for example, when another insurer has already provided you with a policy or processed a claim).
- Insurance brokers and other intermediaries.
- Other insurers who provide our own insurance (reinsurers) and companies who organise this reinsurance.
- The credit reference agencies in the relevant jurisdictions, for example CallCredit, Equifax and Experian are the UK credit reference agencies.
- Third parties providing sanction control services.
- Insurance industry bodies (in particular the Employers' Liability Tracing Office and the Association of British Insurers).
- Financial crime detection agencies and insurance industry databases (including fraud prevention and international sanctions verification), including the Claims Underwriting Exchange (known as "CUE") run by IDS and the Motor Insurance Anti-Fraud and Theft Register run by the Association of British Insurers.
- Our regulators, in particular the Financial Conduct Authority, the Prudential Regulation Authority and the Information Commission.
- Where applicable, your policy details will also be added to the Motor Insurance Database (MID), managed by the Motor Insurers' Information Centre (MIIC).
- The police, HMRC and other crime prevention and detection agencies.
- Third party suppliers, agents and sub-contractors appointed by Liberty Specialty Markets or Liberty Mutual Group to assist us in carrying out our day-to-day business activities, including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our sub-contractors and our tax advisors.
- Third parties selected as part of a sale, transfer or assignment of our activities.
- Any agent or representative acting on your behalf.
- Any other person if this is necessary to perform an insurance contract with you, to protect us against risks or to ensure regulatory compliance or good governance.

3.2. Policyholder or beneficiary under an insurance policy

If you take out an insurance policy with us (for example, an art insurance policy) or if you are listed as an applicant or beneficiary under a policy taken out by another person with us (for example, a director appointed under a directors' and officers' insurance policy), this section applies 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, date of birth and gender.
- Information on your relationship to the policyholder if you are the beneficiary.
- Identification information such as passport details, driving licence and national insurance number.
- Your bank and payment details.
- Where applicable, information about your job, such as job title, work history and professional accreditations.
- Any financial information about you that we have obtained as a result of a credit check, such as bankruptcy orders, individual voluntary arrangements or county court judgments.
- Information we obtain in the course of monitoring sanctions lists, such as those published by the United Nations, the European Union, the UK Treasury, the US Office of Foreign Assets Control (OFAC) and the Bureau of Industry and Security of the US Department of Commerce.
- Any information relevant to your insurance, such as previous insurance policies you have held and claims you have made. For example, if you have a property protection policy, we will collect and use information about your possessions or if you have an art insurance policy, we will collect and use information about your art or jewellery collection.
- Information (including photographic evidence) that is relevant to your policy or claim. For example, if you are making a claim following damage to your property, we may use information relating to your property or if you are making a claim following a road traffic accident, we may use personal data relating to your vehicle and named drivers.
- Information we have collected from public sources such as electoral rolls, newspapers and social media sites.
- Any other information provided by you, your insurance broker or any other person applying on your behalf.

What sensitive personal data do we collect?

- Details of your criminal convictions and any related information. This includes information relating to any offence or suspected offence you have committed or any court conviction against you.
- Information about your physical and mental health relevant to your policy or claim (for example, if you are a pilot and take out or are covered by an aviation insurance policy, we may information about pre-existing medical conditions). This may include medical reports or underlying medical data such as X-rays or blood tests.
- We may also collect information, it is relevant to your policy or application, which reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, genetic or biometric data, or data concerning your sex life or sexual orientation. For example, we may process information relating to your trade union membership if you take out a policy with us through your trade union body, as we may determine that you are a member of a trade union or if you specify certain medical treatments, this could indicate your religious beliefs.

How do we collect your personal data?

We will collect information directly from you:

- when you take out or renew a policy ;
- when we provide you with a quote;
- when you make a claim under your policy;
- when you contact us by e-mail, telephone or other means of written or verbal communication;
- when you contact our third-party administrators by telephone (please note that call recording may be used).
- when you file a complaint.

In addition to the information you provide directly to us, we collect information :

- The designated policyholder when you are the beneficiary.
- third parties involved in the insurance policy or claim in question (such as our business partners and representatives, brokers or other insurers, claimants, defendants or witnesses to an incident).
- Third parties who provide a service in connection with the insurance policy or claim in question (such as claims adjusters, claims handlers and medical experts).
- Publicly available sources such as electoral rolls, court decisions, insolvency registers, internet search engines, press articles and social media sites.
- Other Liberty Mutual Insurance group companies.
- Third parties providing sanction control services.
- Insurance industry bodies (in particular the Employers' Liability Tracing Office and the Association of British Insurers).
- Financial crime detection agencies and insurance industry databases (including fraud prevention and international sanctions monitoring), including the Claims Underwriting Exchange (known as "CUE") run by IDS and the Motor Insurance Anti-Fraud and Theft Register run by the Association of British Insurers.
- Our regulators, in particular the Financial Conduct Authority, the Prudential Regulation Authority and the Information Commission.
- Where applicable, your policy details will also be added to the Motor Insurance Database (MID), managed by the Motor Insurers' Information Centre (MIIC).
- The police, HMRC and other crime prevention and detection agencies.
- Third-party suppliers we appoint to help us carry out our day-to-day business activities, including information technology providers, actuaries, auditors, lawyers, document management providers, business process outsourcing providers, our subcontractors and our tax advisors.
- Third parties selected as part of a sale, transfer or assignment of our activities.

What do we use your personal data for?

We may use your personal data for a number of different purposes. In each case we must have a "lawful reason" for doing so. We will rely on the following "lawful grounds" when processing your "personal data":

- We need use your personal data to enter into or perform insurance contract we have with you. For example, we need to use your personal data to provide you with a quote or to provide you with your insurance policy and other associated products (for example, legal expenses cover). We will rely on this data for activities such as assessing your application, administering your insurance policy, processing claims and providing other products.
- We have a legal or regulatory obligation to use this personal data. For example, our regulators require us to keep certain documents relating to our relationship with you.
- We need use your personal data for a legitimate interest (for example, to properly investigate incidents that are the subject of a complaint, to maintain business records, to conduct strategic business analysis, to review our business planning and to develop and improve our products and services). When using your personal data for these purposes, we will always take account of your rights and interests.

Where the information we process qualifies as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when processing your "sensitive personal data":

- In the UK, we need to use your sensitive personal data for purposes relating to an insurance policy or claim and there is a substantial public interest in such use. These include assessing your insurance claim, managing claims and preventing and detecting fraud.
- We need to use sensitive personal data to establish, exercise or defend legal claims. This may happen when we are faced with legal proceedings or want to take legal action ourselves, or when we are investigating legal action brought by a third party against you.
- We need to use this special category data for a justifiable public interest reason based on a legal obligation (for example, security analysis of email content to detect cyber threats).
- You have given your consent for us to use your sensitive personal data (for example, in connection with your claim compensation). In certain circumstances, we may need your consent to process sensitive personal data (for example, health information). Without this consent, we may not be able to provide you with your insurance policy or process your claims. We will always explain why your consent is necessary.

Purpose for processing	Legitimate reasons for using your personal data	Legitimate reasons for using your sensitive personal data
Assess customers, including fraud, credit and anti-money laundering checks.	• It is necessary for the conclusion or performance of your insurance contract. • We have a legitimate interest (preventing fraud and other financial crime).	• It is in the public interest to prevent or detect illegal acts (when we suspect fraud). • This use is necessary for insurance purposes. • We need establish, exercise or defend legal rights. • You have given us your explicit consent.
To manage and process your insurance application and queries.	• It is necessary to conclude or execute your insurance contract • We have a legitimate interest (assessing your insurance application and managing the application process).	• You have given us your express consent. In certain circumstances, we will need your consent before we can provide you with your insurance policy. • This use is necessary for insurance purposes.
Manage claims under your insurance policy.	• It is necessary to conclude or execute your insurance contract • We have a legitimate interest (to assess and pay your claim and manage the claims procedure).	• You have given us your explicit consent. In certain circumstances, we will need your consent before can pay your claim. • We need use your information establish, exercise or defend legal claims. • This use is necessary for insurance purposes.

Preventing and investigating fraud.	• It is necessary for the conclusion or performance of your insurance contract. • We have a legitimate interest in preventing and detecting fraud and other financial crime.	• You have given us your express consent. In certain circumstances, we will need your consent before we can provide you with your policy or settle your claim. • We need use your information establish, exercise or defend legal claims.
Comply with our legal and regulatory obligations.	• We need use your information to comply with our legal obligations.	• You have given us your explicit consent. • We need use your information establish, exercise or defend legal claims.
Communicate with you and resolve any complaints you may have.	• It is necessary for the conclusion or performance of your insurance contract. • We have a legitimate interest in sending you communications, recording and investigating complaints and ensuring that future complaints are dealt with appropriately.	• You have given us your explicit consent. • We need use your information establish, exercise or defend legal claims. • This use is necessary for insurance purposes.
To improve quality, training and safety (for example, by recording or monitoring telephone calls to our contact numbers, or by carrying out customer satisfaction surveys).	• We have a legitimate interest (to develop and improve the products and services we offer).	• You have given us your explicit consent.
For business and management processes and activities including analysis, review, planning, business transactions and IT hosting, support and security.	• We have a legitimate interest (to run our business efficiently).	• You have given us your explicit consent. • This use is necessary for an important public interest
For insurance management purposes, including trend analysis, actuarial work, service delivery planning, risk assessment and costs and expenses.	• We have a legitimate interest (to develop and improve the products and services we offer).	• You have given us your explicit consent • We need use your information establish, exercise or defend legal claims.

With whom do we share your personal data?

We will keep your personal data confidential and will only share it as necessary for the purposes described above with the following parties.

- Other Liberty Mutual Group companies and their service providers (inside and outside the European Economic Area).
- Third parties involved in the management of the insurance policy or claim in question. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts, including medical experts.
- Other insurers (for example, when another insurer has already provided you with a policy or processed a claim).

- Insurance brokers and other intermediaries.
- Other insurers who provide our own insurance (reinsurers) and companies who organise this reinsurance.
- The credit reference agencies in the relevant jurisdictions, e.g. CallCredit, Equifax and Experian are the UK credit reference agencies.
- Third parties providing sanction control services.
- Insurance industry bodies (including the Employers' Liability Tracing Office).
- Financial crime detection agencies and insurance industry databases (including fraud prevention and international sanctions verification), including the Claims Underwriting Exchange (known as "CUE") run by IDS and the Motor Insurance Anti-Fraud and Theft Register run by the Association of British Insurers.
- Our regulators, in particular the Financial Conduct Authority, the Prudential Regulation Authority and the Information Commission.
- The police, HMRC and other crime prevention and detection agencies.
- Where applicable, your policy details will also be added to the Motor Insurance Database (MID), managed by the Motor Insurers' Information Centre (MIIC).
- Third party suppliers, agents and subcontractors appointed by Liberty Specialty Markets or Liberty Mutual Group to assist us in carrying out our day-to-day business activities, including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and our tax advisors.
- Third parties selected as part of a sale, transfer or assignment of our activities.
- Any agent or representative acting on your behalf.
- Any other person if this is necessary to perform an insurance contract with you, to protect us against risks or to ensure regulatory compliance or good governance.

3.3. Third party claimant

If you have a complaint against a third party who has taken out an insurance policy with us, this section applies 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, date of birth and gender.
- Identification information 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 application, we may collect information about your employment, such as job title, employment history and professional accreditations. We may also collect telematic data such as information about your driving habits.
- Information we obtain in the course of monitoring sanctions lists, such as those published by the United Nations, the European Union, the UK Treasury, the US Office of Foreign Assets Control (OFAC) and the Bureau of Industry and Security of the US Department of Commerce.
- Information about previous insurance policies you have held and claims you have made.
- Information (including photographic evidence) that is relevant to your claim. For example, if you are making a claim following damage to your property, we may use information relating to your property or if you are making a claim following a road traffic accident, we may use personal data relating to your vehicle and named drivers.
- Information we have collected from public sources such as electoral rolls, newspapers and social media sites.
- Any other information provided by you, your representative or any other person making the request on your behalf.

What sensitive personal data do we collect

- Details of your criminal convictions and any related information. This includes information relating to any offence or alleged offence you have committed or any court conviction against you.
- Details of your physical and mental health that are relevant to your claim (for example, because you were injured while in an establishment insured by us). This may include medical reports or underlying medical data such as X-rays or blood tests.

- We may also collect information, it is relevant to your request, which reveals or is likely to reveal your race or ethnicity, your religious or philosophical beliefs, your political opinions, your trade union membership, your genetic or biometric data, or data relating to your sex life or sexual orientation.

How do we collect your personal data?

We will collect information directly from you:

- when you file a for compensation;
- when you contact us by e-mail, telephone or other means of written or verbal communication;
- when you contact our third-party administrators by telephone (please note that call recording may be used).
- when you file a complaint.

In addition to the information you provide directly to us, we collect information :

- The party who holds an insurance policy with us.
- third parties involved in the insurance policy or claim (such as our business partners and representatives, brokers or other insurers, claimants, defendants or witnesses to a claim).
- Third parties who provide a service in connection with the claim (such as loss adjusters, claims handlers and surveyors).
- Publicly available sources such as electoral rolls, court judgements, insolvency , internet search engines, press articles, litigation information and social media sites.
- Other Liberty Mutual Insurance group companies.
- Financial crime detection agencies and insurance industry databases (e.g. for fraud prevention and international sanctions checks), including the Claims Underwriting Exchange (known as "CUE") run by IDS and the Motor Insurance Anti-Fraud and Theft Register run by the Association of British Insurers. Government agencies such as the police, National Crime Agency, DVLA or HMRC.
- In limited circumstances, private investigators.

What do we use your personal data for?

We may use your personal data for a number of different purposes. In each case we must have a "lawful reason" for doing so. We will rely on the following "lawful grounds" when processing your "personal data":

- We have a legal or regulatory obligation to use this personal data. For example, our regulators require us to keep certain documents relating to our relationship with you.
- We need use your personal data for a legitimate interest (for example, to properly investigate incidents that are the subject of a complaint, to maintain business records, to conduct strategic business analysis, to review our business planning and to develop and improve our products and services). When we use your personal data for these purposes, we will always take account of your rights and interests.

Where the information we process qualifies as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when processing your "sensitive personal data":

- In the UK, we need to use your sensitive personal data for purposes relating to an insurance policy or claim and there is a substantial public interest in such use. These include managing claims and preventing and detecting fraud.
- We need to use this sensitive personal data to establish, exercise or defend legal rights. This may occur when we are faced with legal proceedings or want to initiate legal proceedings ourselves, or when we are investigating a claim that has been made against our policyholder.
- We need to use this special category data for a justifiable public interest reason based on a legal obligation (for example, security analysis of email content to detect cyber threats).
- You have given your consent for us to use your personal data. In certain circumstances, we may need your consent to process sensitive personal data (for example, health information). Without this consent, we may not be able to process your requests. We will always explain why your consent is necessary.

Purpose for processing	Legitimate reasons for using your personal data	Legitimate reasons for using your sensitive personal data
Managing compensation.	• We have a legitimate interest (assessing and paying your claim and managing the claims procedure). • We need use your information to comply with our legal obligations.	• You have given us your express consent. In some cases, we will need your consent before we can settle your claim. • We need use your information establish, exercise or defend legal claims. • This use is necessary for insurance purposes.
Preventing and investigating fraud.	• We have a legitimate interest in preventing and detecting fraud and other financial crime.	• You have given us your express consent. In some cases, we will need your consent before we can pay your claim. • We need use your information establish, exercise or defend legal claims.
Comply with our legal and regulatory obligations.	• We need use your information to comply with our legal obligations.	• You have given us your explicit consent. • We need use your information establish, exercise or defend legal claims. • This use is necessary for insurance purposes.
To improve quality, training and safety (for example, by recording or monitoring telephone calls to our contact numbers, or by carrying out customer satisfaction surveys).	• We have a legitimate interest (to develop and improve the products and services we offer).	• You have given us your explicit consent.
For business and management processes and activities including analysis, review, planning, business transactions and IT hosting, support and security.	• We have a legitimate interest (to run our business efficiently).	• You have given us your explicit consent. • This use is necessary for an important public interest
For insurance management purposes, including trend analysis, actuarial work, service delivery planning, risk assessment and costs and expenses.	• We have a legitimate interest (to run our business efficiently).	• You have given us your explicit consent.
Claiming and asserting our insurance rights.	• We have a legitimate interest (to ensure that we have appropriate insurance).	• You have given us your explicit consent. • We need use your information establish, exercise or defend legal claims.

With whom do we share your personal data?

We will keep your personal data confidential and will only share it as necessary for the purposes set out above with the following parties.

- Other Liberty Mutual Insurance Group companies (inside and outside the European Economic Area) and their service providers.
- Third parties involved in the management of your claim, such as claims adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts, including medical experts.
- Other insurers (for example, when another insurer is also involved in a claim you are making).
- Our policyholder.
- Insurance brokers and other intermediaries.
- Other insurers who provide our own insurance (reinsurers) and companies who organise this reinsurance.
- Insurance industry bodies (including the Employers' Liability Tracing Office).
- Third parties providing sanction control services.
- Insurance industry bodies (including the Employers' Liability Tracing Office).
- Financial crime detection agencies and insurance industry databases (including fraud prevention and international sanctions verification), including the Claims Underwriting Exchange (known as "CUE") run by IDS and the Motor Insurance Anti-Fraud and Theft Register run by the Association of British Insurers.
- Our regulators, in particular the Financial Conduct Authority, the Prudential Regulation Authority and the Information Commission.
- The police, HMRC and other crime prevention and detection agencies.
- Where applicable, your policy details will also be added to the Motor Insurance Database (MID), managed by the Motor Insurers' Information Centre (MIIC).
- Third party suppliers, agents and sub-contractors appointed by Liberty Specialty Markets and Liberty Mutual Group to assist us in carrying out our day-to-day business activities, including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our sub-contractors and our tax advisors.
- Third parties selected as part of a sale, transfer or assignment of our activities.
- Any agent or representative acting on your behalf.
- Any other person if this is necessary to perform an insurance contract with you, to protect us against risks or to ensure regulatory compliance or good governance.

3.4. Witnesses to an incident

If you are a witness to an incident that is the subject of a complaint, this section concerns 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, date of birth and gender.
- Information about the incident you witnessed.

What sensitive personal data do we collect

It is not our practice to collect special category data about witnesses to an accident. However, if you are involved in the accident and your details are provided to us (for example, in a medical report), we may process your sensitive personal data.

How do we collect your information

In addition to the information you provide directly to us, we collect information :

- Third parties involved in the incident you witnessed (such as brokers or other insurers, claimants, defendants or other witnesses).
- Other third parties who provide a service in connection with the incident you witnessed (such as loss adjusters, claims handlers and surveyors).

- Publicly available sources such as electoral rolls, court decisions, insolvency registers, insurance databases, internet search engines, press articles and social media sites.
- Other Liberty Mutual Insurance group companies.

What do we use your personal data for?

We may use your personal data for a number of different purposes. In each case we must have a "lawful reason" for doing so. We will rely on the following "lawful grounds" when processing your "personal data":

- We have a legal or regulatory obligation to use this personal data. For example, our regulators require us to keep certain documents relating to our relationship with you.
- We need use your personal data for a legitimate interest (for example, to properly investigate incidents that are the subject of a complaint, to maintain business records, to conduct strategic business analysis, to review our business planning and to develop and improve our products and services). When using your personal data for these purposes, we will always take into account your rights and interests.

Where the information we process qualifies as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when processing your "sensitive personal data":

- In the UK, we need to use your sensitive personal data for purposes relating to an insurance policy or claim and there is a substantial public interest in such use. These include managing claims and preventing and detecting fraud.
- We need to use this sensitive personal data to establish, exercise or defend legal rights. This may happen when we are faced with legal proceedings or want to take legal action ourselves.
- We need to use this special category data for a justifiable public interest reason based on a legal obligation (for example, security analysis of email content to detect cyber threats).
- You have given your consent for us to use your sensitive personal data.

Purpose for processing	Legitimate reasons for using your personal data	Legitimate reasons for using your sensitive personal data
Examine and manage claims under an insurance policy.	• We have a legitimate interest in assessing and paying claims and managing the claims process.	• You have given us your explicit consent. • We need use your information establish, exercise or defend legal claims. • This use is necessary for insurance purposes.
For business and management processes and activities including analysis, review, planning, business transactions and IT hosting, support and security.	• We have a legitimate interest (to run our business efficiently).	• You have given us your explicit consent. • This use is necessary for an important public interest
Comply with our legal and regulatory obligations.	• We need use your information to comply with our legal obligations.	• You have given us your explicit consent. • We need use your information establish, exercise or defend legal claims.
Preventing and investigating fraud.	• We have a legitimate interest in preventing and detecting fraud and other financial crime.	• You have given us your explicit consent. • We need use your information establish, exercise or defend legal claims.

- This use is necessary for insurance purposes.

With whom do we share your personal data?

We will keep your personal data confidential and will only share it as necessary for the purposes set out above with the following parties:

- Other Liberty Group companies.
- Third parties involved in the management of an insurance policy or claim. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts, including medical experts.
- Other insurers (for example, if another insurer is also involved in the incident you witnessed).
- Insurance brokers and other intermediaries.
- Other insurers who provide our own insurance (reinsurers) and companies who organise this reinsurance.
- Insurance industry bodies (including the Employers' Liability Tracing Office).
- Financial crime detection agencies and insurance industry databases (including fraud prevention and international sanctions verification), including the Claims Underwriting Exchange (known as "CUE") run by IDS and the Motor Insurance Anti-Fraud and Theft Register run by the Association of British Insurers.
- Our regulators, in particular the Financial Conduct Authority and the Prudential Regulation Authority.
- The police, HMRC and other crime prevention and detection agencies.
- Where applicable, your policy details will also be added to the Motor Insurance Database (MID), managed by the Motor Insurers' Information Centre (MIIC).
- Third party suppliers, agents and sub-contractors appointed by Liberty Specialty Markets or Liberty Mutual Group to assist us in carrying out our day-to-day business activities, including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our sub-contractors and our tax advisors.
- Third parties selected as part of a sale, transfer or assignment of our activities.
- Any agent or representative acting on your behalf.
- Any other person if this is necessary to perform an insurance contract with you, to protect us against risks or to ensure regulatory compliance or good governance.

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

If you are a broker doing business with us, an appointed representative or another business partner such an introducer or supplier, this section applies to you and describes how we use your personal data.

What personal data do we collect

- General information such as your name, address, contact telephone numbers and e-mail addresses, date of birth and gender, and the language you speak.
- Identification information such as passport details, driving licence and national insurance number.
- Information about your job, such as job title and previous positions.
- Connection information, IP address if you are accessing one of our systems directly.
- Information we obtain in the course of monitoring sanctions lists, such as those published by the United Nations, the European Union, the UK Treasury, the US Office of Foreign Assets Control (OFAC) and the Bureau of Industry and Security of the US Department of Commerce.
- Other information (including publicly available information) obtained as part of our due diligence.
- If you attend an event with us, we may collect relevant information such as your event preferences and dietary requirements.

What sensitive personal data do we collect

- information relating to your criminal convictions (including offences and suspected offences, as well as any outstanding court convictions or criminal sentences).

- If you attend an event organised by us, we may collect information on dietary requirements, which may indicate a state of health or religious beliefs.
- In emergency, we may need to collect sensitive data about you, such as information about your health.

How do we collect your information

In addition to the information you provide directly to us, we collect information :

- Invoices, contracts, policies, correspondence and business cards
- Other Liberty Mutual Insurance group companies.
- Publicly accessible sources, such as Internet search engines.
- By service providers who carry out sanctions checks.
- The information is disclosed by you (for example in an emergency) or by your employer.

What do we use your personal data

We may use your personal data for a number of different purposes. In each case we must have a "lawful reason" for doing so. We will rely on the following "lawful grounds" when processing your "personal data":

- We need use your personal data to enter into or perform the contract we have with you. For example, we may need certain information to manage our business partnership agreement.
- We have a legal or regulatory obligation to use this personal data. For example, we may be required to carry out certain background checks.
- We need use your personal data for a legitimate interest (for example, to maintain business records, conduct strategic business analysis, review our business planning and develop and improve our products and services). When we use your personal data for these purposes, we will always take account of your rights and interests.

Where the information we process qualifies as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when processing your "sensitive personal data":

- We need use your sensitive personal data for purposes relating to an insurance policy or claim and there is a substantial public interest in such use. These purposes include the assessment of an insurance , the management of claims and the prevention and detection of fraud.
- We need to use your sensitive personal data to establish, exercise or defend legal claims. This may happen when we are faced with legal proceedings or want to take legal action ourselves.
- We need to use this special category data for a justifiable public interest reason based on a legal obligation (for example, security analysis of email content to detect cyber threats).
- You have given your consent for us to use your sensitive personal data.
- We must use your sensitive personal data in an emergency to prevent, for example, serious physical harm to you.

Purpose for processing	Legal basis for the use of personal data	Legitimate reasons for using your sensitive personal data
For business and management processes and activities including analysis, review, planning, business transactions and IT hosting, support and security.	• We have a legitimate interest (to run our business efficiently).	• You have given us your explicit consent • This use is necessary for an important public interest
Comply with our legal and regulatory obligations.	• We need use your information to comply with our legal obligations.	• You have given us your explicit consent • We need use your information establish, exercise or defend legal claims.

To underwrite contracts and manage claims	• We have a legitimate interest in efficiently drafting policies and managing claims.	• You have given us your explicit consent. • We need use your information establish, exercise or defend legal claims. • This use is necessary for insurance purposes.
For the purposes of business development and	• We have a legitimate interest (relationship management and commercial analysis).	• You have given us your explicit consent
Improve quality, training and safety (for example, by recording or monitoring telephone calls to our contact numbers).	• We have a legitimate interest (to develop and improve the products and services we offer).	• You have given us your explicit consent.
To manage and process your requests.	• We have a legitimate interest (to manage our activities efficiently and respond to requests). • It is necessary to conclude or perform our contract with you.	• You have given us your explicit consent.
For insurance management purposes including trend analysis, actuarial work, service delivery planning, risk assessment and costs and expenses.	• We have a legitimate interest (to develop and improve the products and services we offer).	• You have given us your explicit consent. • We need use your information establish, exercise or defend legal claims • This use is necessary for insurance purposes.
Protection in an emergency.	• Processing is necessary to protect your vital interests or those of another person.	• Processing is necessary to protect your vital interests or those of another person.

With whom do we share your personal data?

We will keep your personal data confidential and will only share it as necessary for the purposes described above with the following parties:

- Our policyholders and other third parties such as claimants, where applicable.
- Other Liberty Mutual Insurance group companies.
- Third parties involved in the management of an insurance policy or claim. These include 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 who provide our own insurance (reinsurers) and companies who organise this reinsurance.
- Third parties providing sanction control services.
- Financial crime and fraud detection agencies and other third parties who manage and maintain fraud detection registers.
- Our regulators, in particular the Financial Conduct Authority and the Prudential Regulation Authority.
- The police, HMRC and other crime prevention and detection agencies.
- Where applicable, your policy details will also be added to the Motor Insurance Database (MID), managed by the Motor Insurers' Information Centre (MIIC).

- Third party suppliers, agents and subcontractors appointed by Liberty Specialty Markets or Liberty Mutual Insurance Group to assist us in carrying out our day-to-day business activities, including information technology providers, actuaries, auditors, lawyers, document management providers, customer relationship systems providers, outsourced business process management providers, our subcontractors and our tax advisors.
- Third parties selected as part of a sale, transfer or assignment of our activities.
- Any agent or representative acting on your behalf.
- Any other person if this is necessary to perform an insurance contract, to protect us against risks or to ensure compliance with regulations or good governance.
- Anyone who is strictly necessary to protect you in an emergency.

3.6. Users of Liberty Specialty Markets' websites or platforms and event attendees

If you are a user of the Liberty Specialty Markets website (or a platform that links to this notice), this section is relevant to you and describes how we use your personal data.

What personal data do we collect

- General information submitted via the website or platform, for example when you provide your contact details in the contact section, such as your name, contact details and company name.
- Information obtained through the use of cookies. You will find more information on this subject in our cookies policy in the Cookies section below.
- Information obtained via a registration form for an event or promotion.

What sensitive personal data do we collect

We do not intend to collect special category data through the website. However, where appropriate, we may collect dietary information for an event or you may submit special category data as part of an enquiry or complaint.

How do we collect your personal data

- We will collect your information directly from our website or from a platform that links you to our website.
- Our websites may also collect the unique identifier of your device, such an IP address.

What do we use your personal data

We may use your personal data for a number of different purposes. In each case we must have a "lawful reason" for doing so. We will rely on the following "lawful grounds" when processing your "personal data":

- We need use your personal data to enter into or perform insurance contract we have with you. For example, we need to use your personal data to respond to your request for a quote.
- We have a legal or regulatory obligation to use this personal data. For example, our regulators require us to keep certain documents relating to our relationship with you.
- We need use your personal data for legitimate purposes (for example, to monitor the number of visitors to our website, to keep business records and to develop and improve our products and services). When we use your personal data for these purposes, we will always take account of your rights and interests.

Where the information we process qualifies as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when processing your "sensitive personal data":

- We need use your sensitive personal data for purposes relating to an insurance policy or claim and there is a substantial public interest in such use. These purposes include the assessment of an insurance , the management of claims and the prevention and detection of fraud.
- We need to use your sensitive personal data to establish, exercise or defend legal claims. This may happen when we are faced with legal proceedings or want to take legal action ourselves.
- You have consented to our use of your sensitive personal data (for example, in relation to your marketing preferences).

Purpose for processing	Legitimate reasons for using your personal data	Legitimate reasons for using your sensitive personal data
To register you as a user of the website (including recording information on our server from your browser, in particular your IP address and the page you requested)	• We have a legitimate interest (to enable you to use the website and ensure its smooth operation).	N/A
To follow up your requests for information.	• We have a legitimate interest in responding to your requests.	• You have given us your explicit consent. • This use is necessary for insurance purposes.
To provide you with commercial information.	• We have a legitimate interest (to send you selected communications about other products and services we offer).	• You have given us your explicit consent.
To enable you to apply for a recruitment vacancy and manage your application at a later date	• We have a legitimate interest (to ensure that your request is processed and managed efficiently).	• You have given us your explicit consent.
To enable you to submit a request for the organisation of an event and to ensure the subsequent management of the event.	• We have a legitimate interest (to enable you to register for the event)	• You have given us your explicit consent.
To store your data in our customer relationship management systems	• We have a legitimate interest (to improve our relationship with you)	• You have given us your explicit consent.

With whom do we share your personal data?

We will keep your personal data confidential and will only share it as necessary for the purposes described above with our Liberty Mutual Insurance Group companies, agents or subcontractors.

3.7. Prospective job applicants

If you are applying for a job with us, this section concerns 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, date of birth and gender.
- Information about your job, such as job title and previous positions.
- Information on your right to work
- Other information (including publicly available information) obtained as part of our due diligence.
- If you attend events with us, we may collect relevant information, such as your event preferences, dietary requirements, etc., from you.

What sensitive personal data do we collect

- Information relating to your criminal convictions (including offences and suspected offences, and any outstanding court convictions or criminal sentences). If you attend events with us, we may collect information about your dietary requirements. If your CV contains information about your trade union membership, this will be collected.

How do we collect your information

In addition to the information that you provide directly to us, we collect information from service providers, for example recruitment companies that you have appointed.

If you send us your CV or unsolicited application by e-mail, we will keep it on our recruitment portal for 6 months, unless you object.

What do we use your personal data

We may use your personal data for a number of different purposes. In each case we must have a "lawful reason" for doing so. We will rely on the following "lawful grounds" when processing your "personal data":

- We need use your personal data to enter into or perform the employment contract we have with you. For example, we may need certain information to draft a job .
- We have a legal or regulatory obligation to use this personal data. For example, we may be required to carry out certain background checks.
- We need use your personal data for a legitimate interest (for example, to keep your CV on file in case opportunities arise in the future). When we use your personal data for these purposes, we will always take account of your rights and interests.

Where the information we process qualifies as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when processing your "sensitive personal data":

- We need to use this special category data for a justifiable public interest reason based on a legal obligation (for example, security analysis of email content to detect cyber threats).
- You have given your consent for us to use your sensitive personal data.

Purpose for processing	Legitimate reasons for using your personal data	Legitimate reasons for using your sensitive personal data
For business and management processes and activities including analysis, review, planning, business transactions and information technology (hosting, support and security).	• We have a legitimate interest (to run our business efficiently).	• You have given us your explicit consent • This use is necessary for an important public interest
Comply with our legal and regulatory obligations.	• We need use your information to comply with our legal obligations.	• You have given us your explicit consent • We need use your information establish, exercise or defend legal claims
To manage and process your requests.	• We have a legitimate interest (to manage our activities efficiently and respond to requests).	• You have given us your explicit consent. • This use is necessary for insurance purposes.

	• It is necessary to conclude or perform our contract with you.	
For recruitment administration purposes.	• We have a legitimate interest (to carry out our recruitment function).	• You have given us your explicit consent.

With whom do we share your personal data?

We will keep your personal data confidential and will only share it as necessary for the purposes set out above with the following parties:

- Other Liberty Mutual Insurance Group companies (inside and outside the European Economic Area) and their service providers.
- Third parties involved in hosting, analysing and providing recruitment services
- The credit reference agencies in the relevant jurisdictions, for example CallCredit, Equifax and Experian are the UK credit reference agencies.
- Our regulators, in particular the Financial Conduct Authority, the Prudential Regulation Authority and the Information Commission.
- The police, HMRC and other crime prevention and detection agencies.
- Where applicable, your policy details will also be added to the Motor Insurance Database (MID), managed by the Motor Insurers' Information Centre (MIIC).
- Third party suppliers, agents and sub-contractors appointed by Liberty Specialty Markets or Liberty Mutual Group to assist us in carrying out our day-to-day business activities, including IT suppliers, auditors, lawyers, document management suppliers, outsourced business process management suppliers, our sub-contractors and our tax advisors.
- Third parties selected as part of a sale, transfer or assignment of our activities.
- Any agent or representative acting on your behalf.
- A select group of third-party suppliers used to host and manage our recruitment portals (based in the United States).

3.8 External visitors to our offices

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

What personal data do we collect

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

What sensitive personal data do we collect

- We may need to use your sensitive personal data in an emergency.

How do we collect your information?

As a general rule, we obtain information directly from you.

What do we use your personal data for?

We may use your personal data for a number of different purposes. In each case we must have a "lawful reason" for doing so. We will rely on the following "lawful grounds" when processing your "personal data":

- For security reasons, we need to use your personal data to register your access.
- We have a legal or regulatory obligation to use this personal data. For example, we may be required to comply with health and safety laws and regulations.

Where the information we process qualifies as "sensitive personal data", we must have an additional "legal ground". We will rely on the following legal grounds when processing your "sensitive personal data":

- We must use this special category of data to protect vital interests.
- You have given your consent for us to use your sensitive personal data.

Purpose for processing	Legitimate reasons for using your personal data	Legitimate reasons for using your sensitive personal data
For management	• We have a legitimate interest (to manage our activities efficiently and ensure secure access to our premises).	• N/A
Comply with our legal and regulatory obligations.	• We need use your information to comply with our legal obligations.	• We need use your information to ensure health and safety on our premises.
Protection in an emergency.	• Processing is necessary to protect your vital interests or those of another person	• Processing is necessary to protect your vital interests or those of another person

With whom do we share your personal data?

We will keep your personal data confidential and will only share it as necessary for the purposes described above with the following parties:

- Other Liberty Mutual Insurance Group companies (inside and outside the European Economic Area) and their service providers.
- Third parties providing security services.
- Emergency services and other public bodies.
- Any agent or representative acting on your behalf.

3.9 Children

In the course of providing our products and services, we may process the personal data of persons under the age of eighteen in a limited number of cases. This is the case, for example, when a child's details are provided to us as part of a claim for compensation. We have created a specific privacy policy to help children understand our collection and use of their personal data, which can be viewed by [click here].

3.10. Whistleblowing

You can report a problem anonymously or not (anonymously). Where your report is not anonymous, we process your personal data in order to investigate your report and to fulfil our obligations under applicable laws and regulations relating to whistleblowing.

What personal data do we collect?

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

- General information such as your name, telephone number and e-mail address;
- Information about your job, such as job title and company;
- Any other information provided on the application form.

What sensitive personal data do we collect?

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

How do we collect your information?

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

What do we use your personal data for?

We will use this data to comply with our obligations under whistleblowing laws and regulations.

Purpose for processing	Legal basis for the use of personal data	Legal grounds for using your sensitive personal data
Comply with our legal and regulatory obligations	• We must use the data provided to comply with our legal obligations.	• You have given us your explicit consent (where applicable) • The processing is necessary for the performance of the obligations and exercise of the specific rights of the controller or the data subject in the field of employment. • We need to use the information provided to establish, exercise or defend legal rights. • Processing is necessary for reasons of overriding public interest

With whom do we share your personal data?

We will treat your personal data in accordance with our Whistleblowing Policy, which sets out a secure and confidential mechanism for individuals to report any concerns or wrongdoing.

- Internal stakeholders
- Other Liberty Mutual Insurance group companies
- External legal advisors and other suppliers in connection with any investigations required
- Supervisory or enforcement authorities, with whom it may be necessary to share reports or the results of investigations
- Financial crime and fraud detection agencies and other third parties that manage and maintain a fraud detection register
- Any agent or representative working on your behalf

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 "How to contact us".

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

Marketing activities:

We only send marketing communications to our business contacts. This may be by post, email or telephone.

In each case, we will give you the opportunity to unsubscribe. You may also unsubscribe at any time by contacting us using the contact details set out in section 10.

Profiling:

Profiling is an integral part of the insurance offer. We assess the risk you wish to insure (for example, the risk of your home being damaged by flooding) against the likelihood of this event occurring (for example, based on the location of your property and the history of flooding in the area). We use this profiling to help us decide whether to offer you insurance, and the terms, conditions and price of your policy.

As part of our due diligence (e.g. sanctions checks) in relation to our business partners, potential customers and others with whom we may do business, we may provide a limited set of information about you to third party suppliers who assist us in this process. Their processing may include an element of profiling. We do not take automated decisions on the basis of this processing.

Although we use profiling to help us make decisions, it is always a member of our team who makes the decision, taking into account the results of the profiling and other relevant factors.

5. How long do we keep personal data for?

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

We have a detailed retention policy which governs how long we keep different types of information. The exact length of time will depend on your relationship with us and the type of personal data we hold, for example:

- if we provide a quote for a policy but you do not take out the policy (or do not take out the policy on your behalf), we will retain the associated information for 36 months.
- if you make a claim under a policy we provide, we will retain your personal data for 10 years from the date the claim is closed.

If you would like more information about the retention periods for your personal data, please contact us using the details given in section 10.

6. What is our approach on transferring data outside the European Union ("EU")?

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

In the event of a transfer, we will take steps to ensure the protection of your personal data. To do this, we will use a number of different methods, including

- put in place appropriate contracts. We will use a set of contractual wordings known as "standard contractual clauses" which have been approved by the Data Protection Authorities.

Depending on our relationship and your particular situation, we may need to transfer personal data anywhere in the world. For example, if you have a personal accident insurance policy with us and you are injured, we may need to send medical experts or other service providers to the country where you are injured. A summary of our regular transfers of data outside the EEA is set out below:

Country of transfer	Reason for transfer	Methods of protecting your data
United States and United Kingdom	• Transfer to Liberty Mutual group companies in the United States - Reporting to our parent company, IT support and hosting, centralised commercial functions in the United States and the United Kingdom.	• Robust IT security standards used and standard contractual clauses
United States and United Kingdom	• Transfer to service providers to enable us to carry out our activities	• Due diligence on suppliers, contracts, audits and standard contractual clauses

India	• Transfer to service providers to enable us to carry out our activities	• Due diligence on suppliers, contracts, audits and standard contract clauses
Dubai	• Liberty Specialty Markets MENA Limited is a Liberty Specialty Markets company registered with the Dubai International Financial Centre.	• IT security standards and standard contractual clauses
Brazil, Colombia and China	• Service providers have access to certain applications for risk analysis and policy processing.	• IT security standards and standard contractual clauses

If you would like more information about our data transfers and the measures 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 information very seriously. We maintain appropriate technical, organisational and physical safeguards designed to protect the personal data we process in accordance with our clients' instructions and our legal and regulatory obligations. The security measures in place on our website and computer systems are designed to protect the loss, misuse or alteration of the information you provide to us. We will only retain your personal data for as long as is reasonably necessary to fulfil the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

Liberty Mutual Group has a number of information security standards that apply depending on the type and location of the data. These standards cover access controls, encryption, network and host security, physical security, data recovery and business continuity. Our standards change from time to time as we respond to market challenges and evolving regulatory requirements.

Because e-mail sent via this website is not protected by the same security measures that we use in other areas where we actively collect information, you should take special care when deciding what information you wish to send to us via e-mail.

If you are aware of any actual or potential misuse of this information, or if you would like further information about 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 which are set out below. You may exercise your rights by contacting us at any time using the contact details set out in section 10. We will not normally charge you for any request.

Please note that, although we take your rights seriously, there may be occasions when we are unable to comply with your request, for example if it means that we cannot comply with our own legal or regulatory requirements. In this case, we will let you know why we cannot comply with your request.

In certain circumstances, the execution of your request may result in the cancellation of your insurance policy or the abandonment of your claim. For example, if you request the deletion of your personal data, we will not have the information necessary to settle your claim. We will inform you of this when you make your request.

- **The right to access your personal data**

You have the right to obtain a copy of the personal data we hold about you and certain details about how we use it.

We will generally provide you with your personal data in writing unless you request otherwise. If your request has been made electronically (for example, by e-mail), a copy of your personal data will be provided to you electronically wherever possible.

- **The right of rectification**

We take reasonable steps to ensure that the information we hold about you is accurate and, where appropriate, up to date and complete. If you believe that there are inaccuracies, discrepancies or gaps in the information we hold about you, you may contact us and ask us to update or amend it.

- **The right to restrict processing**

In certain circumstances, you have the right 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 if you believe that we no longer need to use your personal data.

- **The right to withdraw**

Where we rely on your consent to process your personal data, you have the right to withdraw that consent for the subsequent use of your personal data.

Please note that for certain purposes we need your consent to provide you with your policy. If you withdraw your consent, we may have to cancel your policy or we may not be able to settle your claim. We will inform you of this at the time you seek to withdraw your consent.

- **The right to**

This right is sometimes referred to as the "right to be forgotten". It allows you, in certain circumstances, to request the deletion of your personal data. For example, when we no longer need your personal data for the original purpose for which we collected it or when you have exercised your right to withdraw your consent.

Although we will consider each request, there are other factors to take into account. For example, we may not be able to delete your information as you have requested because we have a regulatory obligation to retain it.

- **The right to object**

Direct marketing: You have control over the extent to which we market to you and you have the right to ask us to stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" button in any email we send you or by contacting us using the contact details set out in section 10.

Please note that even if you exercise this right because you do not wish to receive marketing messages, we may still send you service-related communications if necessary.

Processing based on our legitimate interests: Where we process your personal data on the basis of our legitimate interests, you may object to such processing. We will examine your objection and determine whether our legitimate interests infringe your privacy rights.

- **The right to data portability**

In certain circumstances, you may ask us to transfer the personal data you have provided to us to a third party.

- **Rights relating to automated decision-making**

We do not make any automated decisions. If this changes in the future, we will provide you with an updated notice describing our decision-making process.

- **The right to lodge a complaint with the regulator**

You have the right to lodge a complaint with the Belgian Data Protection Authority (“Gegevensbeschermingsautoriteit”) or any other local data protection regulator if you believe that we have breached data protection laws in the use of your personal data.

You can visit their website at https://www.dataprotectionauthority.be/ for more information. Please note that filing a complaint will not affect any other legal rights or remedies you may have.

9. Cookies

By accessing and using this website, you indicate that you agree to the use of cookies by Liberty Specialty Markets.

The website uses cookies, which are small files of letters and numbers that Liberty Specialty Markets places on your computer if you allow it. After your visit to the website, cookies will remember the language you selected during your visit. They also allow us to recognise and count the number of visitors and to see how visitors move around the site. Some cookies are necessary to enable you access the website and to make your browsing experience more user-friendly.

This website may be linked to third party websites (including websites of Liberty Mutual Insurance group companies) which may also use cookies over which we have no control. We recommend that you check the privacy policies of the third parties concerned for information on the cookies they may use.

You can configure your web browser to refuse cookies, to delete them or to inform you when a cookie is being installed. The "Help" section in the menu bar of most web browsers will tell you how to do this. You can delete and block all cookies but, in this case, our website may not function properly and you may not be able to access certain areas. For more information on cookies and how to delete them, visit http://www.allaboutcookies.org/ .

If you would like to find out more about the cookies we use on this website, click here.

10. How to contact us

If you would like further information on any of the matters set out in this notice or if you have any other questions about how we collect, hold or use your personal data, you can contact our Data Protection Officer at dataprotectionofficer@libertyglobalgroup.com or by writing to the Data Protection Officer, Liberty Specialty Markets, 20 Fenchurch Street, London, EC3M 3AW or by clicking here.

Please note that we are not responsible for the privacy policies or the content of websites linked to this website (including the websites of Liberty Mutual Insurance Group companies).

11. Updates to this notice

From time to time, we may need to amend this notice, for example as a result of legislative, technological or other changes. We will provide you with the most recent notice and you will be able to consult it regularly on our website.

This Data Protection Statement was last updated on 12 December 2025.