

## Privacy policy

### Intermediaries, sub-brokers, appointed representatives and other business partners, such as lawyers and claims handlers

If you are an intermediary or sub-broker doing business with us, an appointed representative or other business partner such as a lawyer or claims handler, this section will be relevant to you and sets out our uses of your personal information.

#### What personal information will we collect?

- > Your name, address, date of birth and gender.
- > Contact information, including previous contact information, such as your telephone numbers and email addresses.
- > Information about your job such as job title and previous roles.
- > Information which we obtain as part of checking sanctions lists.
- > Information which we have gathered from publicly available sources such as internet search engines like Google, Companies House, Government department websites and social media sites, including Facebook, YouTube and LinkedIn. We will ensure that any such data is used for a justifiable purpose and is, where possible, accurate and up to date

#### What special category/sensitive personal information will we collect?

Details about your criminal convictions and any related information. This will include information relating to any unspent convictions, pending prosecutions, fixed penalty notices or other relevant elements such as arrests or unspent cautions..

#### How will we collect your information?

As well as obtaining information directly from you, we will collect information from:

- > Invoices, contracts, policies, correspondence and business cards
- > Other companies within the QBE Group.
- > Publicly available sources such as internet search engines like Google, Companies House, Government department websites and social media sites, including Facebook, YouTube and LinkedIn.
- > Sanctions lists such as those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC), HM Treasury, Department of Foreign Relations & Trade and Federal Public Service Finance list .

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

As outlined in [section 3](#), the 'legal grounds' we will rely on when we process your 'personal information' and/or 'special category/sensitive personal information' are as follows:

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special category/sensitive personal information, as applicable to the circumstances.
Managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g. tax or legal advice). For business processes and activities including analysis, review, planning and business transactions.	<ul style="list-style-type: none"><li>&gt; Legal or regulatory obligation</li><li>&gt; Legitimate interests</li></ul>	<ul style="list-style-type: none"><li>&gt; Legal rights</li><li>&gt; Consent</li></ul>

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### What will we use your personal information for? (continued)

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special category/sensitive personal information, as applicable to the circumstances.
To provide key business services such as policy and claims administration.	> Legitimate interests	> Not applicable
To build and maintain our business relationships.	> Legitimate interests	> Not applicable
To communicate with you to manage and handle your queries and provide you with marketing communications.	> Legitimate interests > Contract performance	> Not applicable
Complying with our legal or regulatory obligations.	> Legal or regulatory obligation	> Consent > Insurance purposes > Legal rights
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers).	> Legitimate interests	> Not applicable
Investigating or detecting the unauthorised use of our systems, to secure our systems and to ensure the effective operation of our systems).	> Legitimate interests	> Consent > Legal rights
Transferring or selling all or part of our business or re-organising our company structure.	> Legal or regulatory obligation > Legitimate interests	> If we are selling the entity which processes your data then the same lawful bases for processing the data will apply as above (the 'controller' will remain the same).  > If we transfer only part of our business to a new owner which is not part of the QBE group, including your insurance policy, we will only transfer your special category data for the following legal grounds: <ul style="list-style-type: none"><li>• Consent</li><li>• Legal rights</li></ul>

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### Who will we share your personal information with?

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

- > Our policyholders and other third parties such as claimants, where relevant.
- > Other QBE Group companies for our general administration purposes, marketing purposes in accordance with the preferences you have expressed or for the prevention and detection of fraud.
- > Our other insurance partners such as intermediaries, sub-brokers, Coverholders, (re)insurers or other companies who act as (re)insurance distributors.
- > Third parties who assist in the administration of the insurance policy or claim. These include loss adjusters, claims handlers, surveyors, risk managers, valuers, accountants, auditors, banks, lawyers and other experts including medical experts.
- > Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance.
- > Third parties who provide sanctions checking services.
- > Fraud detection agencies (including the Insurance Fraud Bureau ([www.insurancefraudbureau.org](http://www.insurancefraudbureau.org)) and other third parties who operate and maintain fraud detection registers.
- > Private investigators/investigative firms and third parties, such as The Cotswold Group, we ask to look into claims on our behalf in relation to suspected fraud.
- > Our regulators including the Financial Conduct Authority and the Prudential Regulation Authority.
- > The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime.
- > Our third-party service providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers, management consultancies, outsourced business process management providers, our subcontractors and tax advisers.
- > Selected third parties in connection with any sale, transfer or disposal of our business.