

### OUR PRIVACY PLEDGE

Clements & Co. (“Clements Worldwide”), along with the insurance companies we represent, believe that information personal to our clients and prospects should be respected and protected. For this reason, we are committed to protecting your nonpublic personal information and using it only as appropriate or necessary to provide you with the best possible service and products. This Privacy Policy, which describes our information practices and policies in detail, applies to our relationship with you as an individual who enquires about or obtains products or services from us for personal, family or household purposes.

### COOKIES

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. For example, cookies are used to remember users’ preferences and to help navigate between pages efficiently. Clements Worldwide sends cookies to your computer from our website. We use cookies in order to monitor customer traffic patterns and site usage so we can develop the design and layout of our website. This process is to ensure we better meet the needs of visitors to our website. It includes non-specific data such as mouse movements and pages visited.

Should you wish to refuse to accept cookies or restrict the data what we collect through our tracking software, you can alter your cookies setting in your web browser. This may however mean you will be unable to access parts of our website. For more information on cookies you can visit <http://www.allaboutcookies.org/>.

### INFORMATION WE COLLECT

We may collect personal information about you from a variety of sources. A great deal of the information we collect, such as your name, address, birth date, phone number, passport number, medical and health history, medical treatment, personal property descriptions and related matters comes from you during the application or claim submission process. We may collect information about you to properly underwrite and review your application or to properly investigate, administer, and resolve any claims for benefits, and we may contact you by telephone, fax, mail or e-mail for additional information. We also may collect personal information about you from third parties, such as governmental entities or regulators, medical providers and other health related sources, and possibly from consumer reporting agencies. The information we collect can include such things as information concerning your previous insurance coverage and policies, your employment status, credit card information, your claims and medical history, and on rare occasions, your credit history.

### HOW WE USE YOUR INFORMATION

We may use the information we collect to send you information about our products and services. We may use the information we collect for analytical purposes and to assist us in improving our processes, products and services. We will use your information collected to safe-guard against fraud and money laundering, comply with applicable laws and regulatory obligations (including laws outside your country of residence) and establish and defend legal rights. We will also use your information to handle requests for data access or correction as well as when we are resolving complaints.

## **INFORMATION WE DISCLOSE TO THIRD PARTIES**

We do not disclose personal information about you to third parties for their own marketing purposes or to contact you about their own products or services. We share personal information about you with third parties (that is, people and companies that are not affiliated with us) only as appropriate or necessary to provide you with our products and services and as otherwise permitted by law. For example, we may disclose your personal information as appropriate or necessary to service your policy and to administer and provide you with benefits in accordance with the terms and provisions thereof; to investigate, administer, and pay or deny or otherwise resolve claims; to comply with state and federal regulatory requests or demands; and to process other transactions that you request.

Persons and other third parties to whom we may make such disclosures may include persons who perform a business function for us, insurance regulators or law-enforcement authorities, insurance companies (The represented companies may share information with their affiliates so that they may offer you additional products and services. They do not disclose information to other companies or organizations not affiliated with them for the purpose of using information to sell their products or services to you.), preferred provider organizations, reinsurers, insurance and claim adjusters, insurance premium auditors, attorneys who are retained by us or by them, and persons requesting information pursuant to subpoena or court order.

## **INTERNATIONAL TRANSFER OF PERSONAL DATA**

Due to the global nature of our business, for the purposes set out above we may transfer Personal Information to parties located in other countries. For example, we may transfer Personal Information in order to process international travel insurance claims and provide emergency medical assistance services when you are abroad. We may transfer information internationally to our group companies, service providers, business partners and governmental or public authorities. If your data originate in the European Economic Area (EEA), we may send your data outside the EEA for processing and storage. By submitting your personal data to us you are consenting to the storage and transfer of your data in this way. If we do this we will take reasonable steps to protect your data. Such transfer will comply with all applicable data protection regulations and with our obligation to adequately protect and secure your personal information.

## **RETENTION OF PERSONAL DATA**

Clement Worldwide takes reasonable steps to ensure that the Personal Information we process is reliable for its intended use, and as accurate and complete as is necessary to carry out the purposes described in this Privacy Policy. We will retain Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. If you have any questions concerning our use of your personal data, please contact our Compliance Department at [compliance@clements.com](mailto:compliance@clements.com).

## **YOUR CONSENT**

By providing your personal information to Clements Worldwide you consent to the processing, transfer and retention of your personal data. We do not knowingly collect, use, or disclose information of children under the age of sixteen (16) without the consent of their parents or legal guardians. In any instance where such information was collected, it would be purely accidental and unintentional.

## **Changes to Your Policy**

We review this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements. We place updates on our website.

## **Information Security**

We restrict access to personal information about you to those employees who need to know that information in order to provide products and administrative services to you. We maintain physical, electronic and procedural safeguards to guard your personal information.

## **Ongoing Access to Privacy Policy**

This policy may change from time to time, but you can always review our current policy by visiting our website at [www.clements.com/terms-conditions](http://www.clements.com/terms-conditions) or request a copy of your information by contacting us at our offices below:

### **U.S. Global Headquarters**

1301 K St. NW, Suite 1200 West  
Washington, D.C. 20005  
1.800.872.0067

### **London, United Kingdom**

40 Lime Street  
London, UK EC3M 7AW 44  
(0).33.0099.0104

### **Dubai, United Arab Emirates**

The Gate Precinct  
Building 3 - DIFC  
Level 5, Office 509  
P.O. Box 30613  
Dubai, UAE  
971.(0)4.375.4758

*For information concerning our products and services, please visit our website at:*  
[www.clements.com](http://www.clements.com)