

## PRIVACY AND DATA PROTECTION NOTICE (GDPR)

### 1. DATA PROTECTION

Clements Worldwide (the Data Controller) is committed to protecting and respecting your privacy in accordance with the General Data Protection Regulation (“Legislation”). Below is a summary of the main ways in which we process your personal data, for more information please visit our website at [www.clements.com](http://www.clements.com).

### 2. HOW WE USE YOUR PERSONAL DATA

We may use the personal data we hold about you for the purposes of providing insurance; including handling claims and any other related purposes, underwriting (which may include underwriting decisions made via automated means), offering renewal terms, pricing or statistical purposes. We may also use your data to safeguard against fraud and money laundering and to meet our general legal and regulatory obligations.

### 3. SENSITIVE PERSONAL DATA

Some of the personal information, such as information relating to health or criminal convictions, may be required by us for the specific purposes of underwriting or as part of the claims handling process. The provision of such data is necessary for us to be able to provide you with insurance or manage a claim. Such data will only be used for the specific purposes set out in our notice.

### 4. DISCLOSURE OF YOUR PERSONAL DATA

We may disclose your personal data to third parties involved in providing products or services to us, or to service providers who perform services on our behalf. These include our group companies, affinity partners, brokers, agents, third party administrators, insurers, reinsurers, other insurance intermediaries, insurance reference bureaus, credit agencies, medical service providers, fraud detection agencies, loss adjusters, external law firms, external accountants and auditors, regulatory authorities, and as may be required by law.

### 5. INTERNATIONAL TRANSFERS OF DATA

We may transfer your personal data to destinations outside the European Economic Area (“EEA”). Where we transfer your personal data outside of the EEA, we will ensure that it is treated securely and in accordance with the Legislation.

### 6. YOUR RIGHTS

You have the right to ask us not to process your data for marketing purposes, to see a copy of the personal information we hold about you, to have your data deleted (subject to certain exemptions), to have any inaccurate or misleading data corrected or deleted, to restrict the processing of your data, to ask us to provide a copy of your data to any controller and to lodge a complaint with the local data protection authority.

### 7. RETENTION

Your data will not be retained for longer than is necessary, and will be managed in accordance with our data retention policy. In most cases the retention period will be for a period of seven (7) years following the expiration of the contract of insurance, or our business relationship with you, unless we are required to retain the data for a longer period due to business, legal or regulatory requirements.

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).

## PRIVACY AND DATA PROTECTION NOTICE (CCPA)

### 1. PRIVACY STATEMENT

Clements Worldwide is committed to protecting and respecting your privacy in accordance with the California Consumer Privacy Act of 2018. This applies solely to visitors, users and others who reside in the State of California. Below is a summary of the ways in which we collect, use and share your personal information, for more information please visit our website at [www.clements.com](http://www.clements.com).

### 2. INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information from consumers within the last 12 months: Identifiers, Personal information categories listed in the California customer records statute (Cal.Civ Code 1798.80), Protected Classification characteristics under California or federal Law, Commercial information, Biometric information, Internet or other similar network activity, Geolocation data and Professional or employment-related information. More information and examples can be found in Clements privacy policy.

Some of the personal information, such as information relating to health or criminal convictions, may be required by us for the specific purposes of underwriting or as part of the claims handling process. The provision of such information is necessary for us to be able to provide you with insurance or manage a claim. Such information will only be used for the specific purposes set out in our notice. Personal information does not include; Publicly available information from government records, de-identified or aggregated consumer information and information excluded from the CCPA's scope.

### 3. HOW WE OBTAIN PERSONAL INFORMATION

We obtain the categories of personal information listed above from a number of sources such as; directly from our clients or their agents, indirectly from our clients or their agents, directly and indirectly from activity on our website ([www.clements.com](http://www.clements.com)) and from third parties that interact with us in connection with the service we perform.

### 4. USE OF PERSONAL INFORMATION

We may use the personal information we hold about you for the purposes for which the information was collected i.e. providing insurance; including handling claims and any other related purposes, underwriting (which may include underwriting decisions made via automated means), offering renewal terms, pricing or statistical purposes. We may also use your data to safeguard against fraud and money laundering and to meet our general legal and regulatory obligations or to respond to law enforcement requests.

### 5. SHARING PERSONAL INFORMATION

We may disclose your personal information for business purposes to third parties involved in providing products or services to us, or to service providers who perform services on our behalf. These include our group companies, affinity partners, brokers, agents, third party administrators, insurers, reinsurers, other insurance intermediaries, insurance reference bureaus, credit agencies, medical service providers, fraud detection agencies, loss adjusters, external law firms, external accountants and auditors, regulatory authorities, and as may be required by law. In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose; identifiers, California customer records personal information

categories, protected classification, commercial information, biometric information, internet or other similar network activity, Geolocation data and Professional or employment-related information.

In the preceding twelve (12) months we have not sold any personal information.

## **6. YOUR RIGHTS**

The CCPA provides consumer (California residents) with specific rights regarding their personal information. You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your request, we will disclose to you the categories of personal information we collected about you, the categories of sources for the person information we collected, our business or commercial purpose for collecting that personal information, the categories of third parties with whom we share that person information, the specific pieces of personal information we collected and whether we sold or disclosed your personal information for a business purpose.

## **7. DELETION REQUEST**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we received and confirm your consumer request, we will delete your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers.

## **8. NON-DISCRIMINATION**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not deny you goods or service, charge you different prices or rates for goods or services, provide you with a different level or quality of goods or services or suggest that you may receive a different price or rate for goods or services.

## **9. EXERCISING YOUR RIGHTS**

If you have any questions concerning our use of your personal information or for more information on the exceptions and response times please refer to our full privacy policy. To exercise the access, data portability, and deletion rights described above please submit a consumer request to us by contacting [compliance@clements.com](mailto:compliance@clements.com)



## Your personal information notice

### ***Who we are***

We are the Lloyd's underwriter(s) identified in the contract of insurance and/or in the certificate of insurance.

### ***The basics***

We collect and use relevant information about you to provide you with your insurance cover or the insurance cover that benefits you and to meet our legal obligations.

This information includes details such as your name, address and contact details and any other information that we collect about you in connection with the insurance cover from which you benefit. This information may include more sensitive details such as information about your health and any criminal convictions you may have.

In certain circumstances, we may need your consent to process certain categories of information about you (including sensitive details such as information about your health and any criminal convictions you may have). Where we need your consent, we will ask you for it separately. You do not have to give your consent and you may withdraw your consent at any time. However, if you do not give your consent, or you withdraw your consent, this may affect our ability to provide the insurance cover from which you benefit and may prevent us from providing cover for you or handling your claims.

The way insurance works means that your information may be shared with, and used by, a number of third parties in the insurance sector for example, insurers, agents or brokers, reinsurers, loss adjusters, sub-contractors, regulators, law enforcement agencies, fraud and crime prevention and detection agencies and compulsory insurance databases. We will only disclose your personal information in connection with the insurance cover that we provide and to the extent required or permitted by law.

### ***Other people's details you provide to us***

Where you provide us or your agent or broker with details about other people, you must provide this notice to them.

### ***Want more details?***

For more information about how we use your personal information please see our full privacy notice(s), which is/are available online on our website(s) or in other formats on request.

### ***Contacting us and your rights***

You have rights in relation to the information we hold about you, including the right to access your information. If you wish to exercise your rights, discuss how we use your information or request a copy of our full privacy notice(s), please contact us, or the agent or broker that arranged your insurance who will provide you with our contact details at:

***FAO: Compliance***  
***Ark Syndicate Management Limited***  
***30 Fenchurch Avenue***  
***London***  
***EC3M 5AD***  
***020 3023 4020***  
***[arkGDPR@arkunderwriting.com](mailto:arkGDPR@arkunderwriting.com)***

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