

## Privacy Notice

### White Bear Group Privacy Notice

#### 1. Introduction

We strive to protect the privacy and confidentiality of Personal data that our companies process in connection with the services provided to clients and individuals' use of the Blenheim website. We are committed to ensuring that any personal data we receive is handled in accordance with applicable data protection laws.

This notice describes how we, as a data controller, collect, use, share and retain the personal information you provide, and informs you about your choices regarding use, access, and correction of your personal information.

Insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, brokers, insurers, and reinsurers. For an overview of how and why the insurance industry is required to use and share Personal Data please see the [London Insurance Market Core Uses Information Notice](#) hosted on the website of the London Market Group (LMG). Our core uses and disclosures are consistent with the London Market Core Uses Information Notice.

Please read the following carefully to understand how we will treat your personal information.

#### 2. Identity of Controller and Contact Details

The White Bear group of companies contains the following data controllers: White Bear Capital Limited, White Bear Corporate Services Limited, Blenheim Underwriting Limited, and Blenheim Partnerships Limited (White Bear or We or Us). All White Bear companies are registered at 7<sup>th</sup> Floor, 70 Mark Lane, London EC3R 7NQ.

#### 3. Collecting your data

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.

We may collect a range of personal and business information supplied by you or third parties on your behalf.

Specifically, we may collect the following information throughout the duration of your relationship with us:

- Individual personal details such as your name, address, date of birth or age, gender, marital status, and additional information about your insurance requirements.
- Contact details (such as email addresses and telephone numbers) related to correspondents, brokers and/or other relevant connections to insurance business.
- Personal information and health information related to your insurance requirements and details of any specific current or historic claims.
- Credit and anti-fraud data such as information about fraud convictions, allegations of crimes and sanctions details received from various anti-fraud and sanctions databases, regulators or law enforcement agencies.

- Marketing data: whether or not the individual has consented to receive marketing from us and/or from third parties and/or their marketing preferences.
- Website and communication usage: details of your visits to our websites and information collected through cookies and other tracking technologies, including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

We may also collect special category data, such as race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sex life or sexual orientation when needed to provide insurance or process claims. This information will only be used for the specific purpose for which it was provided and to carry out the agreed service. In certain instances, we will also need to collect and process special category data relating to individuals who may benefit from the policy. Where necessary we will obtain your specific consent to use special category data. We may do this via an intermediary or broker.

We may collect data about other individuals, such as employees, family, or members of your household. If you give us information about another person, it is your responsibility to ensure and confirm that you have told that person why and how their personal data will be used and that you have that person's permission to provide that data (including any special category data) to us and for us to process it.

#### 4. Using Your Information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Assessing your application for a product, service, or quote.
- Providing and administering relevant insurance policies:
- Client care, including communicating with you.
- Payments to and from individuals.
- Verifying your identity and carrying out sanctions/anti-fraud/financial crime checks.
- Handling claims:
  - Managing insurance and reinsurance claims.
  - Defending or prosecuting legal claims.
  - Investigation or prosecuting fraud.
- Dealing with complaints.
- General risk modelling and data analytics.
- The testing of IT systems and processes. Testing which uses personal data will only be carried out in limited circumstances and only when appropriate safeguards and controls have been put in place
- Conducting surveys and other evaluations.
- Renewals:

- Contacting the policyholder to renew your policy.
- Evaluating the risk to be covered and matching to appropriate policy/premium.
- Payment of premium
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with legal or regulatory obligations.
- Transferring books of business, company sales & reorganisations.
- To communicate with you regarding any queries you raise via the website
- To monitor your interaction with the website to ensure service quality, compliance with procedures and to combat fraud
- To ensure the website content is relevant and presented in the most effective manner for you and your device.

## 5. Retention of Your Information

We will keep your personal data only for as long as it is necessary and for the purpose for which it was originally collected. For example, we will keep your personal data for so long as there is any possibility that either you or we may wish to bring a legal claim under your policy of insurance, or where we are required to keep your personal data due to legal or regulatory reasons.

Retention of specific personal data may be necessary for one or more of the following reasons:

- To fulfil statutory or other regulatory requirements.
- To evidence events/agreements in case of disputes.
- To meet our operational needs.
- To save data for historical purposes.

We will securely delete or erase your personal information if there is no valid business reason for retaining your data.

Details of specific retention periods for different aspects of your personal data are available in our Data Retention Schedule which you can request from us, via our contact details above.

## 6. Sharing Your Information

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, premium collection and claims validation processors and providers, sub-contractors, auditors, 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.

We require all third parties to respect the security of your personal data. Parties processing data on our behalf are only permitted to process your personal data for specified purposes and in accordance with our instructions.

For a broader understanding of how personal data is managed within the insurance market, please refer to the [London Market Core Uses Information Notice](#) as above.

#### International Transfer

From time to time we may need to share your personal information with other insurance market participants or their affiliates, including Lloyd's subsidiaries, who may be based outside of the United Kingdom and EEA. We may also need to share your personal information with other companies within our group. We may also allow our service providers, who may be located outside the United Kingdom and EEA, access to your personal information. We may also make other disclosures of your personal information overseas, for example if we receive a legal or regulatory request from a foreign law enforcement body.

We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests.

- We will only transfer your personal information to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights:
- Where applicable, transfers of data overseas will be covered by standard contractual clauses, adopted by the European Commission which give specific contractual protections designed to ensure that your personal information receives an adequate and consistent level of protection.
- Any requests for information we receive from law enforcement or regulators will be carefully checked before personal information is disclosed.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data.

#### 7. Storing Your Information

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### 8. Your Rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.

- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

Request access to your personal data (commonly known as a “data subject access request”). You are entitled to a confirmation whether we are processing your data, a copy of your data, and information about purposes of processing, who do we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, where we got your data from and how you can make a complaint. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Please be advised that there may be consequences if you exercise your right to erasure. If you subsequently make a claim, it may be impossible to administer your claim without your personal data.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

We can continue to use your personal data following a request for restriction, where we have your consent; to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used,

machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you (such as the payment of claims). We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [Contact us](#) as detailed above.

#### 9. Changes to our privacy notice

We may amend this Privacy Policy from time to time for example, to keep it up to date or to comply with legal requirements. You should regularly check this Privacy Policy for updates. If there will be any significant changes made to the use of your personal information in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website.

#### 10. Questions, Requests or Complaints

To submit questions or requests relating to this Privacy Policy or our data protection practices, please contact us at the following address:

The Data Protection Officer  
7th Floor, 70 Mark Lane  
London EC3R 7NQ

Email: [groupcompliance@whitebear.group](mailto:groupcompliance@whitebear.group)

Phone: 0203 889 8080

If we are unable to resolve an enquiry or a complaint, individuals have the right to contact the UK data protection regulator, the [Information Commissioner's Office](#) (ICO). The ICO can be contacted by telephone at 0303 123 1113 or by email at [casework@ico.org.uk](mailto:casework@ico.org.uk).

Alternatively, to make a complaint to us, please review our [Complaints Notice](#).