



## Data Privacy Notice

### WHO WE ARE

Your privacy is very important to us. This privacy notice (“Privacy Notice”) is provided by Resolute Management Limited (“Resolute”). References to “we”, “our” and “us” in this Privacy Notice are references to Resolute. References to “you” or “your” refers to the individual whose personal data is being processed by Resolute as agent for the insurer (you may be the insured, beneficiary, claimant or other person involved in a claim or relevant to the insurance policy).

**We** are a controller of **your** personal data under applicable data protection laws including from May 25<sup>th</sup> 2018 the General Data Protection Regulation (“GDPR”). **We**, as a controller determine why and how we collect **your** personal data.

Contact Address:

Resolute Management Limited  
4<sup>th</sup> Floor  
8 Fenchurch Place  
London  
EC3M 4AJ

### WHAT IS THE PURPOSE OF THIS PRIVACY NOTICE

In order to administer and handle claims under the insurance policy, Resolute may collect information about **you** which constitutes personal data under the GDPR. This Privacy Notice explains how **we** collect, use, share and protect **your** personal data. Please read this Privacy Notice carefully to understand what **we** do with **your** personal data.

We may change this Privacy Notice from time to time and if we make any material changes then we will make the updated Privacy Notice available.

#### 1. PERSONAL DATA WE MAY COLLECT ABOUT YOU.

In order for us to administer insurance policies including handling claims and dealing with any complaints, we need to collect and process personal data about **you**. The types of personal data that are processed may include:

Types of Personal Data	Details
Individual details:	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, academic and professional information, family details, including their relationship to <b>you</b> .
Identification details:	Identification numbers issued by government bodies or agencies, including <b>your</b> national insurance number or , passport number, tax identification number and driving licence number
Financial information:	Bank account or payment card details, income or other financial information
Policy information:	Information about the policies you have taken out
Credit and Anti-Fraud Data:	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to <b>you</b>
Previous and current claims:	Information about previous and current claims, (including other unrelated insurances), which may include data relating to <b>your</b> health, criminal convictions, or other <b>special categories of personal data</b> and in some cases, surveillance reports
<b>Special categories of personal data:</b>	Certain categories of personal data which have additional protection under the GDPR. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation

## 2. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

We might collect your personal data from various sources, including:

- **you**;
- **your** family members, employer or representative;
- other **insurance market participants**;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies such as the DVLA and HMRC;
- open electoral register; or
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers

Which of the above sources apply will depend on **your** particular circumstances.

## 3. WHO HAS ACCESS TO YOUR PERSONAL DATA?

The insurance life-cycle may involve the sharing of **your** personal information between **insurance market participants** (an intermediary, insurer, reinsurer), some of which **you** will not have direct contact with. In addition, **your** personal data may not have been collected directly by **us**.

**You** can find out the identity of the initial data controller of **your** personal data within the insurance market life-cycle in the following ways:

- Where you took out the insurance policy yourself: the insurer and, if purchased through an intermediary, the intermediary will be the initial data controller and their data protection contact can advise you on the identities of other insurance market participants that they have passed **your** personal data to.
- Where your employer or another organisation took out the policy for your benefit: **you** should contact **your** employer or the organisation that took out the policy who should provide you with details of the insurer or intermediary that they provided **your** personal data to and **you** should contact their data protection contact who can advise **you** on the identities of other insurance market participants that they have passed **your** personal data to
- Where you are not a policyholder or an insured: you should contact the organisation that collected **your** personal data who should provide **you** with details of the relevant insurance market participants data protection contact.

#### 4. THE PURPOSES, CATEGORIES AND LEGAL GROUNDS OF OUR PROCESSING OF YOUR PERSONAL DATA.

Data protection law says that **we** are only allowed to use personal information if **we** have a proper reason for doing so. This includes when **we** share it outside Resolute. Data protection law says **we** must have one or more of the following reasons:

- For the performance of the insurance contract
- When it is **our** legal duty
- When it is in **our** legitimate interest
- When **you** consent to it

When **we** have a commercial or other business interest reason of **our** own to use **your** personal information this is called a “legitimate interest”. **We** will tell **you** what that is if **we** rely on it as a means to process your data

**We** will not collect and use special categories personal data information without **your** consent unless the law allows **us** to do so. If **we** do it will only be for reasons of:

- When it is necessary for reasons of substantial public interest, or
- To establish, exercise or defend legal claims

**We** set out below the purposes and legal basis for which **we** may process **your** personal data during the lifecycle of administering insurance products and services .

Purpose	Categories of Data	Our Reasons
<b>Policy Administration</b>		
▪ Client care and including	▪ Individual details	▪ Perform contract

<ul style="list-style-type: none"> <li>communication with you and sending updates</li> <li>▪ Payments to and from individuals</li> </ul>	<ul style="list-style-type: none"> <li>▪ Policy information</li> <li>▪ Risk details</li> <li>▪ Previous claims</li> <li>▪ Current claims</li> </ul>	<ul style="list-style-type: none"> <li>▪ Legitimate interests <ul style="list-style-type: none"> <li>- To correspond with clients, beneficiaries and claimants in order the handling of claims</li> </ul> </li> <li>▪ Substantial Public Interest</li> <li>▪ Consent</li> </ul>
<b>Claims Processing</b>		
<ul style="list-style-type: none"> <li>▪ Managing insurance and reinsurance claims</li> <li>▪ Defending or prosecuting legal claims</li> <li>▪ Investigating or prosecuting fraud</li> </ul>	<ul style="list-style-type: none"> <li>▪ Individual details</li> <li>▪ Policy information</li> <li>▪ Risk details</li> <li>▪ Previous claims</li> <li>▪ Current claims</li> <li>▪ Health data</li> <li>▪ Criminal records data</li> <li>▪ Other sensitive data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Perform contract</li> <li>▪ Legitimate interests <ul style="list-style-type: none"> <li>- To assess the veracity and quantum of claims</li> <li>- Defend and make claims</li> <li>- To assist with the prevention and detection of fraud</li> </ul> </li> <li>▪ Consent</li> <li>▪ Legal claims</li> <li>▪ Substantial public interest</li> </ul>
<b>Throughout the insurance lifecycle</b>		
<ul style="list-style-type: none"> <li>▪ Complying with our legal and regulatory obligations</li> <li>▪ Risk modelling</li> <li>▪ Handling complaints</li> <li>▪ Transferring books of business, company sales and reorganisations</li> </ul>	<ul style="list-style-type: none"> <li>▪ Individual details</li> <li>▪ Policy information</li> <li>▪ Identification details</li> <li>▪ Current claims</li> <li>▪ Previous claims</li> <li>▪ Financial Information</li> <li>▪ Risk details</li> </ul>	<ul style="list-style-type: none"> <li>▪ Legal Obligation</li> <li>▪ Consent</li> <li>▪ Substantial Public Interest</li> <li>▪ Legitimate Interests <ul style="list-style-type: none"> <li>- To structure our business appropriately</li> <li>- To build risk models</li> </ul> </li> </ul>

## 5. WHO WE MAY SHARE YOUR PERSONAL DATA WITH

In order to undertake the activities listed above it may be necessary to share **your** data with third parties. Who **we** share this data with may depend on the insurance products and services we administer but may include:

- The insurer
- Other insurers that co-insure the policy
- Reinsurance intermediaries
- Reinsurance Companies
- Loss adjusters, solicitors and claims management companies
- Anti-Fraud agencies and private investigators
- Government departments and databases
- Outsourced service providers
- Regulators

## 6. CONSENT

In order to provide insurance cover and deal with insurance claims in certain circumstances **we** may need to process **your special categories of personal data**, such as medical and criminal convictions records, as set out against the relevant purpose.

**Your** consent to this processing may be necessary for Rolute to achieve this.

**You** may withdraw **your** consent to such processing at any time. However, if **you** withdraw **your** consent this will impact **our** ability to administer the insurance policy or pay claims.

## **7. RETENTION OF YOUR PERSONAL DATA**

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

## **8. INTERNATIONAL TRANSFERS**

**We** may need to transfer **your** data to **insurance market participants** or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA) where data privacy laws may not be the same as they are in the EEA. Those transfers would always be made in compliance with the GDPR.

**If you would like further details of how your personal data would be protected if transferred outside the EEA, please contact [DPO@ResoluteManagement.com](mailto:DPO@ResoluteManagement.com)**

## **9. – YOUR RIGHTS AND CONTACT DETAILS OF THE ICO**

If you have any questions in relation to **our** use of **your** personal data, **you** should first contact the Data Protection Officer at Resolute Management Services Limited by post or email using the following details:

Data Protection Officer  
Resolute Management Services Limited  
4<sup>th</sup> Floor, 8 Fenchurch Place  
London EC3M 4AJ  
Email: [DPO@ResoluteManagement.com](mailto:DPO@ResoluteManagement.com)

Under certain conditions, **you** may have the right to require **us** to:

- provide **you** with further details on the use **we** make of **your** personal data/special categories of data;
- provide **you** with a copy of the personal data that **you** have provided to **us**;
- update any inaccuracies in the personal data **we** hold;
- delete any special category of data/personal data that **we** no longer have a lawful ground to use;
- where processing is based on consent, to withdraw **your** consent so that **we** stop that particular processing;
- object to any processing based on the legitimate interests ground unless **our** reasons for undertaking that processing outweigh any prejudice to **your** data protection rights; and
- restrict how we use your personal data whilst a complaint is being investigated.

In certain circumstances, we may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

## **YOUR RIGHT TO COMPLAIN TO THE ICO**

If you are not satisfied with our use of your personal data or our response to any request by you to exercise any of your rights in SECTION 9, or if you think that we have breached the GDPR, then you have the right to complain to the ICO. Please see below for contact details of the ICO.

### **England**

Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate) or  
Tel: 01625 545 745 (national rate)  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

### **Scotland**

Information Commissioner's Office  
45 Melville Street  
Edinburgh  
EH3 7HL

Tel: 0131 244 9001  
Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)

### **Wales**

Information Commissioner's Office  
2nd floor Churchill House  
Churchill way  
Cardiff  
CF10 2HH

Tel: 029 2067 8400  
Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

### **Northern Ireland**

Information Commissioner's Office  
3rd Floor, 14 Cromac Place  
Belfast  
BT7 2JB

Tel: 0303 123 1114 (Local rate)  
Tel: 028 9027 8757 (national rate)  
Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)