

AMTRUST INTERNATIONAL UNDERWRITERS DAC

Privacy Notice July 2023



AMTRUST INTERNATIONAL UNDERWRITERS DAC - PRIVACY NOTICE

We review this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in our business activities, legal requirements, and the manner in which we process Personal Information. We will place updates on this website and where appropriate we will give reasonable notice of any changes.

Contents

1. SUMMARY.....	3
2. INFORMATION WE COLLECT OR RECEIVE ABOUT YOU	3
3. HOW WE USE YOUR INFORMATION AND THE LEGAL BASIS	4
4. WHY AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION	5
5. INTERNATIONAL TRANSFERS OF DATA.....	6
6. YOUR RIGHTS.....	6
7. PROFILING AND AUTOMATED DECISION MAKING	7
8. RETENTION.....	8
9. COOKIES.....	8

1. SUMMARY

We are committed to protecting and respecting your privacy in accordance with the current Data Protection Legislation (“Legislation”). This notice sets out the basis on which we will process any Personal Information that we collect from you, or that you provide to us. For the purposes of the Legislation, the Data Controller in relation to any Personal Information you supply to us is AmTrust International Underwriters DAC (“AmTrust”).

If you have any questions concerning our privacy notice or our use of your Personal Information, including exercising your rights detailed in Section 6, you can contact the Data Protection Officer at AmTrust International Underwriters Designated Activity Company, 6-8 College Green, Dublin 2, D02 VP48, Ireland, email dpo.dublin@amtrustgroup.com.

2. INFORMATION WE COLLECT OR RECEIVE ABOUT YOU

The Personal Information we collect and hold about you and other individuals will differ depending on our relationship, including the type of communications between us and the products and services we provide. Different types of Personal Information will be held if you are an insurance policyholder or claimant, compared to where you benefit from insurance coverage under an insurance policy taken out by another policyholder (for example, you are insured under a corporate policy taken out by your employer). Likewise, we will hold different Personal Information if you are a commercial insurance broker or appointed representative, a witness, or another individual with whom we have a relationship.

As we are in the business of providing insurance, claims, assistance and related services, the Personal Information we hold and process, depending on our relationship, includes:

Personal Information	Detail and examples
General identification & contact information	<ul style="list-style-type: none">• Name, postal address, email, and telephone number.• Gender, marital and family status, date and place of birth, and physical characteristics (appropriate to the circumstances).
Information enabling us to provide products and services	Location, identification number and/or similar information to identify insured and/or product property linked to the insurance requested. Information can be received from you or a third party, and allows to calculate premium, offer, and accept insurance cover.
Insurance and claim information	Policy and claim numbers, relationship to policyholder, insured, claimant or other relevant individual, date and cause of property damage, loss or theft, injury, disability or death, activity records and other information relevant to insurance policy issuance, and claim assessment and settlement.
Insurance account details	Insurance account log-in information and passwords for accessing insurance policy, claim and other accounts.
Telephone recordings	Recordings of telephone calls to our representatives and call centers.
Photographs and video recordings	Images or video recordings created in connection with our insurance or other business activities, including for claims assessment, administration, and settlement, claim disputes, or for other relevant purposes as permitted by law.
Government and other official identification numbers	Social security or national insurance number, passport number, tax identification number, driver’s license number, or other government issued identification number - appropriate to the circumstances.

Financial information	Payment card number, bank account number and account details, credit history and credit score, assets, income, and other financial information.
Medical condition and health	Current or previous physical, mental or medical condition, health status, injury or disability information, medical diagnosis, medical procedures performed, and treatment given, personal habits, prescription information, and medical history.
Information to detect, investigate or prevent crime, including fraud and money laundering	Insurers commonly collect, hold and share information about their previous dealings with policyholders and claimants with the intention of the detection, investigation and prevention of fraud, money laundering and other criminal activities.
Other sensitive information	Information about religious beliefs, ethnicity, political opinions or trade union membership (for example, if an insurance application is made through a third party partner that is a professional, trade, religious, community or political organization), sexual life and orientation, or genetic or biometric information.

3. [HOW WE USE YOUR INFORMATION AND THE LEGAL BASIS](#)

Data protection law seeks to ensure that the way Personal Information is used is fair. To comply with the law, we need to tell you the legal justification we rely on for using your Personal Information. Personal Information will be used for different purposes if you are a policyholder, insured or claimant under an insurance policy, a commercial insurance broker or appointed representative, a witness or another individual with whom we have a relationship. The main purposes for which we use Personal Information are to:

Purposes of processing	Personal Information	Details	Legal Basis
Communicate with you and other individuals	General id & contact info, Insurance account details, Telephone recordings	-	Contract Performance
Make assessments and decisions	All in section 2, other than "Government & other official id numbers"	Automated and non-automated, including by profiling individuals about: the provision and terms of insurance, prices calculation (for you or future customers), and settlement of claims and provision of assistance and other services.	Legal Obligation
Provide insurance, claims and assistance services, and other products and services	All in section 2	Which we offer, including claim assessment, administration, settlement and dispute resolution.	Contract Performance
Assess your eligibility & identity	All in section 2, other than "Telephone, photographs & video recordings"	For payment plans, and to process your premium and other payments.	Contract Performance
Manage complaints, feedback and queries	All in section 2	And handle requests for data access or correction, or the exercise of other rights relating to Personal Information.	Legal Obligation
Improve the quality of our products and services, provide staff training and maintain information security	All in section 2, other than "Medical condition & health, & other sensitive info"	For example, for this purpose we may record or monitor phone calls.	Legal Obligation

Prevent, detect and investigate crime	All in section 2	Including fraud and money laundering, and analyse and manage other commercial risks.	Legal Obligation
Manage our business operations and IT infrastructure	All in section 2	In line with our internal policies and procedures, including those relating to finance and accounting, billing and collections, IT systems operation, data and website hosting, data analytics, business continuity, records management, document and print management, and auditing.	Contract Performance
Comply with applicable laws and regulatory obligations	All in section 2	Including laws and regulations outside your country of residence - for example, laws and regulations relating to anti-money laundering, sanctions and anti-terrorism; comply with legal process and court orders; and respond to requests from public and government authorities (including those outside your country of residence).	Legal Obligation
Establish, enforce and defend legal rights	All in section 2	To protect our business operations, and those of our group companies or business partners, and secure our rights, privacy, safety or property, and that of our group companies or business partners, you, or other individuals or third parties; to enforce our terms and conditions; and pursue available remedies and limit our damages.	Legal Obligation

4. WHY AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION

To enable us to provide you with insurance, to manage claims and to support our general business activities and regulatory obligations, we disclose your data to companies within the AmTrust Group, external parties or our businesses partners who are involved in offering products and services to you, our service providers, and governmental or other public authorities. These categories include:

Type of third party	Examples
Our group companies	AmTrust belongs to the AmTrust Financial Services, Inc. (AmTrust Group) of companies. AmTrust group has companies throughout the world, both inside and outside Europe (for example, in the USA & UK). We may share your Personal Information with other group companies (including for administrative accounting purposes). You will find a list of the companies included in the AmTrust Group at www.amtrustinternational.com .
Other insurance and insurance distribution parties	Where permitted by applicable law, AmTrust may share Personal Information with other third parties, for example, other insurers, reinsurers, insurance and reinsurance brokers, other intermediaries, and agents, appointed representatives, distributors, affinity marketing partners and financial institutions, securities firms and other business partners.
Our service providers	External service providers, such as commercial and credit information companies, accountants, actuaries, auditors, experts, lawyers and other professional advisors or experts; Support teams and IT services providers and other third party vendors and outsourced service providers that assist us in carrying out business activities.
Government authorities and public authorities or bodies	AmTrust may disclose Personal Information to government or other public authorities (including, but not limited to, workers' compensation boards, courts, regulatory bodies, law enforcement agencies, tax authorities and criminal investigations agencies), and to bodies which we have a legal obligation to disclose information.
Other third parties	If necessary for purpose respecting regulatory and legal framework.

5. [INTERNATIONAL TRANSFERS OF DATA](#)

For the purposes stated above, and where applicable, we may transfer your Personal Information to destinations outside the European Economic Area (“EEA”) including to the USA. Where we transfer your Personal Information outside of the EEA, we will ensure that it is treated securely, and in accordance with this privacy notice and the legislation. We only transfer data to countries deemed as having [adequate protection by the European Commission](#) or, where there is no adequacy decision, we use the European Commission approved ‘Standard Contractual Clauses’ with such parties to protect the data. A copy of the ‘Standard Contractual Clauses’ can be obtained by writing to The Data Protection Officer at the address detailed in Section 1.

6. [YOUR RIGHTS](#)

Individuals in the European Economic Area (EEA) have several rights in connection with their Personal Information. These rights only apply in certain circumstances and are subject to certain legal exemptions. These rights include a right to request a copy of the Personal Information we hold about you.

If you wish to exercise the following rights, please contact us using the details below (see section 1) or you may submit requests via our website by clicking [here](#).

Type of right	Description
Right of access to Personal Information	You have the right to receive a copy of the Personal Information we hold about you and information about how we use it.
Right to rectification of Personal Information	You have the right to ask us to correct Personal Information we hold about you where it is incorrect or incomplete.
Right to erasure of Personal Information	This right is sometimes referred to as 'the right to be forgotten'. Under certain circumstances, such as when you have revoked your previously given consent and there is no other legal ground available for us to process your Personal Information, you may request to have your Personal Information erased.
Right to restrict and object processing of Personal Information	You have the right to request that we suspend our use of your Personal Information. However, this right only applies in certain circumstances. Where we suspend our use of your Personal Information, we will still be permitted to store your Personal Information, but any other use of this information while our use is suspended will require your consent, subject to certain exemptions.
Right to data portability	This right allows you to obtain your Personal Information in a format which enables you to transfer that Personal Information to another organization. However, this right only applies in certain circumstances.
Rights relating to automated decision making and profiling	You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you. However, this right only applies in certain circumstances.
Right to withdraw consent to processing of Personal Information	Where we have relied upon your consent to process your Personal Information, you have the right to withdraw that consent.

Right to complain to the relevant data protection authority	You are welcome to contact us with any enquiries and complaints that you may have regarding the processing of your Personal Information. You also have the right to lodge complaints pertaining to the processing of your Personal Information to the local or European data protection authority.
--	--

To ensure we only disclose personal information where we know we are dealing with the right individual, we will ask you for proof of identity when making a request to exercise any of these rights. We will respond to all valid requests within one month within one month, provided to have all the information required to respond.

For every request, AmTrust will make a priority to resolve your complaints as quickly as possible. For AmTrust in Ireland, the relevant data protection authority is the Data Protection Commission who may be contacted by telephone at +353 761 104 800 or by webform available at <https://www.dataprotection.ie/en/contact/how-contact-us>.

7. PROFILING AND AUTOMATED DECISION MAKING

We provide services where we sometimes use automated decision-making. Automated decision-making is an important part of effective management. If the result of an automated decision affects you to a significant degree, you have the right in some cases not to be subjected to automated processing alone. This means that in some cases you have the right to demand manual treatment. In cases where this right arises, you will receive information about it in connection with the process being carried out.

Type of automated decision-making	Description
When purchasing insurance	We may carry out a credit check based on information from third parties. The decision will be automated and, where applicable, special information about this will be provided as well as information about your rights.
When calculating price	Automated decision-making may occur, and that process includes profiling as a part, to calculate price in relation to insurance risk. The profiling may include Personal Information, e.g. age, address, and number of injuries in the last five years. Profiling may also be included, based on data from third parties in the price calculation. Calculation of the price of insurance and processing of Personal Information in these cases is required for us to be able to offer insurance.
In claims handling	The decisions are based on your insurance conditions and the information you give us when reporting a claim. If a case is decided based on automated processing, you will receive information about the decision and your rights.
In order to prevent and detect insurance fraud	We use certain analytical methods for monitoring claims. Profiling may be used to identify potential fraud cases. In the profiling, Personal Information such as social security number, address, telephone number and network analyzes may appear. It may also include data from third parties.

As a result, we carry out checks on certain claims. Cases are automatically selected but sent to review for manual processing by an investigator.

8. 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 ten (10) years following the expiry of the insurance contract 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. In any case, where data are retained, we will delete or anonymise any personal elements, in order to maintain your privacy and security.

9. COOKIES

AmTrust uses cookies and similar tracking technologies to deliver a smooth and user-friendly online experience. Cookies are small text files consisting of letters and numbers. These are sent from AmTrust's web servers and saved on your device for a limited time. The cookies we use improve the services we offer you. Some of our services need cookies to function, while others are simply there to make our services more convenient for you. For more information on cookies and deletion of cookies please visit: <http://www.allaboutcookies.org/manage-cookies/>.