

ERGO Versicherung AG UK Branch and ERGO UK Specialty Ltd Data Privacy Notice

This data privacy notice is designed to help you understand how ERGO Versicherung AG UK Branch and/or ERGO UK Specialty Ltd (herein referred to as ERGO) processes your personal data.

This notice specifically covers what personal data we collect about you if you are a third party acting in a professional capacity.

Data Subject Access Rights

You have a number of rights in relation to the data we hold about you. These rights include but are not limited to:

- Data Portability: the transfer of your personal data to another Data Controller.
- Erasure: to have your personal data removed or deleted.
- Rectification: to have your personal data corrected if it is inaccurate.
- Restrict Processing: to restrict processing where your personal data is inaccurate, or the processing is unlawful.
- Subject Access Request: to access your personal data and information around its processing.
- To object to direct marketing.

Please note that there are times when we will not be able to delete your data. This may be as a result of a requirement to fulfil our legal and regulatory obligations or where there is a minimum statutory period of time for which we have to keep your data. If we are unable to fulfil a request, we will always let you know our reasons.

Please contact the Compliance Manager if you have questions concerning this Data Privacy Notice or your Data Subject Access Rights. You can contact the Compliance Manager at: MUNICH RE Group Offices, 13th Floor, 10 Fenchurch Avenue, London, EC3M 5BN or by emailing: Compliance@ergo-commercial.co.uk or by telephoning: 0203 003 7000

If you are unhappy with any response given or have a complaint, you can raise this with:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

What information do we collect about you, and what we use it for?

In the course of our relationship with you, we may process your personal data for a range of different reasons. For each reason we must have a lawful basis for processing and we will rely on the following as our lawful bases:

- We have a legal or regulatory obligation to use your personal data.
- We have a legitimate business need to use your personal data for operational and business administration purposes. When using your personal data for these purposes, we have assessed the basis our processing and ensured that our legitimate business need does not result in any detriment to you.

Personal Data

Categories of data	Type of information processed	Where the data comes from	Purpose of Processing	Lawful basis of Processing	Who we disclose data to
Individual Information	Name, Address, Contact details , Date of birth, Gender	You	To assess or assist in claims made either by or against our policyholders	We have a legitimate business need	Group companies and firms providing administration services.
Employment Information	Job Title, Business Description, Education, Employment History, Professional Certifications	Third parties involved in the claims process including Claims Handlers, Claims Adjusters and Assessors, Relevant Claims Experts Publically Available Sources	Managing our business operations such as maintaining business and policy records.	We have a legitimate business need	Reinsurers. Our agents and other intermediaries or market participants. Credit reference agencies. Anti-fraud databases.
			Managing records of the firms we do business with.		
			Legal or Regulatory Purposes	We have a legal or regulatory obligation	Government and Civil Agencies Regulatory Bodies
			Prevention and Detection of Fraud	We have a legitimate business need	

How we protect your information

Your privacy is important to us and we follow strict technical, physical and organisational procedures in the processing, storage, disclosure and destruction of your data. This is to protect against any unauthorised access or damage to, or disclosure or loss of, your data.

Call monitoring and recording

For quality control purposes and to audit the way in which claims are handled, we may review recordings of telephone calls made to our claims handlers.

Data retention

Your personal data will only be kept for as long as it is necessary for the purpose for which it was collected.

Category of data	How long we retain your data
Claims Records (Files)	5 Years following full and final settlement
Claims Records (MI and Bordereaux)	10 Years following full and final settlement
Accounting Records	10 Years
Other General Insurance Records	7 Years

Transfer of data

Personal details may be transferred to countries outside the EEA. They will at all times be held securely and handled with the utmost care in accordance with all applicable principles of English law. Personal details will not be transferred outside the EEA unless it is to a country which is considered to have equivalent standards with regard to data protection, or we have taken reasonable steps to ensure that suitable data protection standards are in place. Your personal data may be disclosed to companies within the Group outside the EEA or to other entities outside the EEA that provide business services, subject to the above-mentioned data protection measures.

Changes to this information 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. Should any significant changes be made to the ways in which ERGO processes data from those described at the time of collection, we will post a notice on our website.