

Introduction

Globe Underwriting Limited is committed to protecting your privacy. This Privacy Policy explains how Globe Underwriting Limited processes personal data. It sets out the types of personal data which we may collect from you or your representatives and explains why we need it, how we will use it and how long we may keep it for. Please read this Privacy Policy carefully and contact us if you have any queries using the details set out in the Contact Details section at the end of this Privacy Policy.

We will use "Globe", "we" or "us" in this Policy to refer to the relevant. Where we use the word "insurance", it will also mean reinsurance.

Data Controller

Globe Underwriting Limited is a company authorised by an insurer or managing agent to enter into a contract or contracts of insurance. These contracts are underwritten by an insurer or members of a syndicate managed by a managing agent in accordance with the terms of a binding authority. Globe Underwriting Limited is an Appointed Representative for Ed Broking LLP, which is authorised and regulated by the Financial Conduct Authority in respect of general insurance business. The General Data Protection Regulation (GDPR), which came into force on 25 May 2018, imposed particular responsibilities for protecting personal data upon data controllers. Data controllers are the organizations or persons who decide the purposes for which personal data is processed and the way in which this is carried out. The identity of a data controller depends on a particular business relationship involved. However, Globe who underwrite or administering an insurance contract or administering a claim under an insurance contract will normally act as the data controller so in this case, your data controller will normally be Globe Underwriting Limited. Globe may act as joint data controller with another company and where this is the case, we ensure that there is an arrangement in place to set out our respective responsibilities under GDPR.

About the Insurance Market

Insurance involves the use and disclosure of personal data by various insurance market participants such as brokers, other intermediaries, insurers and reinsurers. The London Insurance Market Core Uses Information Notice sets out those core necessary personal data uses and disclosures. Our core uses and disclosures are consistent with the London Insurance Market Core Uses Information Notice. We recommend you review this notice using the below link:

www.londonmarketgroup.co.uk/gdpr

Categories of Personal Data Processed by Globe

The types of personal data processed by Globe will depend on the nature of our individual business relationships. The type of personal data which we need to collect and use will also vary according to the particular stage of the insurance transaction life cycle involved. Those stages range from our customer due diligence

and set up, initial discussions about insurance requirements, seeking insurance quotations and indications, concluding insurance contracts and the underwriting and administering of those contracts and handling any claims.

The main categories of personal data processed by Globe per stage of the insurance life cycle are set below. However, it is important to note that there may be case by case variations.

Prospective customers or parties covered under an insurance policy	
Personal Data	Special Categories of Personal Data
Individual Details such as your name, address, other contact details such as telephone number and email address, (and those of business contacts at your organization) gender, date and place of birth, nationality, employer, job title and employment history, professional qualifications, family details including their relationship to you, relationship to the customer where you are not the prospective policyholder	Information relating to your physical or mental health
Identification Details: identification numbers issued by government bodies or agencies such as passport number, national insurance number, driving licence number or tax identification number, copies of passports and utility bills where required for due diligence	Information relating to criminal offences or professional disciplinary action relating to you
Financial Information such as your financial needs, history, bank statements and other details and other financial information	Your political opinions, religious or philosophical beliefs or trade union membership
Financial Crime Prevention and Credit Information: results of sanctions, anti-corruption and anti-fraud searches and checks, credit references and scores	
Your marketing preferences	
Information through our use of cookies	

Customers or parties covered under an insurance policy	
Personal Data	Special Categories of Personal Data
Individual Details such as your name,	Information relating to your physical or

<p>address, other contact details such as telephone number and email address (and those of business contacts at your organization), gender, date and place of birth, nationality employer, job title and employment history, professional qualifications, family details including their relationship to you, relationship to the customer where you are not the prospective policyholder</p>	<p>mental health</p>
<p>Identification Details: identification numbers issued by government bodies or agencies such as passport number, national insurance number, driving licence number or tax identification number</p>	<p>Information relating to criminal offences or professional disciplinary action relating to you</p>
<p>Financial Information such as your financial needs, history, bank details and other financial information including information relating to any cancellation of your insurance policy</p>	<p>Any other Special Categories of Personal Data you may provide when communicating with us. We will only process such information to the extent necessary in connection with the insurance policy or in connection with legal proceedings. Any further processing will be with your specific consent.</p>
<p>Financial Crime Prevention and Credit Information: results of sanctions, anti-corruption and anti-fraud searches and checks, credit references and scores</p>	
<p>Information relating to the services you are requesting such as your previous insurance policies and claims history</p>	
<p>Information relating to any insurance policy we have placed and any claims made under it</p>	
<p>Information obtained in relation to requests for mid-term adjustments</p>	
<p>Information obtained in relation to requests for mid-term adjustments</p>	

Your marketing preferences	
Information through our use of cookies	

Brokers, Other Intermediaries, Insurers and Reinsurers	
Personal Data	Special Categories of Personal Data
Individual Details such as your name, address, other contact details such as telephone number and email address (and those of business contacts at your organization), gender, date and place of birth, nationality employer, job title and employment history, professional qualifications	Information relating to criminal offences such as the results of sanctions checks
Identification Details: identification numbers issued by government bodies or agencies such as passport number, national insurance number, driving licence number or tax identification number, copies of passports and utility bills where required for due diligence	Any information which we record which is relevant to doing business with you
Financial Information relevant to doing business with you such as your bank details	
Results of sanctions checks and other financial crime prevention checks and due diligence	
Your marketing preferences	
Information through our use of cookies	

Claims Third Party Agents, Professional Advisors and Experts	
Personal Data	Special Categories of Personal Data
Individual Details such as your name, address, other contact details such as telephone number and email address (and those of business contacts at your organization), job title and employment history, professional qualifications	Information relating to criminal offences such as the results of sanctions checks
Identification Details: relevant identification numbers issued by government bodies or agencies such as tax numbers	Any information which we record which is relevant to doing business with you

Financial Information relevant to doing business with you such as your bank details	
Results of sanctions checks and other financial crime prevention checks and due diligence	
Your marketing preferences	

Third Party Claimants	
Personal Data	Special Categories of Personal Data
Individual Details such as your name, address, other contact details such as telephone number and email address (and those of business contacts at your organization), gender, date and place of birth, job title and employment history, professional qualifications	Information relating to criminal offences such as the results of sanctions checks or where relevant to your claim
Identification Details: relevant identification numbers issued by government bodies or agencies such as tax numbers	Any other Special Categories of Personal Data relevant to your claim
Financial Information relevant to your position as a third party claimant including your bank details and other financial information	Any other Special Categories of Personal Data you may provide when communicating with us. We will only process such information to the extent necessary in connection with the insurance policy or in connection with legal proceedings. Any further processing will be with your specific consent.
Results of sanctions checks and other financial crime prevention checks and due diligence	
Your marketing preferences	
Information through our use of cookies	

Globe's Use of Personal Data and the Legal Grounds We Rely Upon

Prospective customers or parties covered under an insurance policy	
Use of Personal Data	Legal Ground
To set up customers including fraud, sanctions, credit and anti-money laundering checks	Personal Data: necessary for the insurance contract; business requirement; meeting legal and regulatory obligations to carry out financial crime prevention

	<p>checks</p> <p>Special Categories of Personal Data: necessary for insurance purpose; fraud prevention is in public interest and necessary for the purpose of our legal rights</p>
Communicating with you and responding to queries	<p>Personal Data: necessary for the insurance contract and to meet business requirements; to meet legal and regulatory obligations</p> <p>Special Categories of Personal Data: necessary for insurance purpose;</p>
Meeting legal and regulatory responsibilities including reporting	<p>Personal Data: legal and regulatory obligation</p> <p>Special Categories of Personal Data: necessary for insurance purpose and for meeting legal and regulatory obligations</p>
Managing our business operations	<p>Personal Data: necessary for business requirements</p>

Customers or parties covered under an insurance policy	
Use of Personal Data	Legal Ground
To evaluate the risks to be covered, review capital requirements and risk mitigation techniques, model risks, review exposure and other actuarial analysis, match to coverage terms and obtain a quote	<p>Personal Data: to meet a business need to find insurance cover for you</p>
To arrange insurance cover and provide contract documentation	<p>Personal Data: necessary to perform insurance contract and to meet a business need</p> <p>Special Categories of Personal Data: necessary for insurance purpose</p>
Payment of premium	<p>Personal Data: to perform insurance contract and to meet a business need</p>
Claims Handling	<p>Personal Data: necessary to perform insurance contract and to meet a business need</p> <p>Special Categories of Personal Data: necessary for insurance purpose</p>
To assist with renewals, mid-term adjustments or cancellations	<p>Personal Data: necessary to perform insurance contract and to meet a business need</p> <p>Special Categories of Personal Data: necessary for insurance purpose</p>

Fraud Prevention and Detection	<p>Personal Data: necessary to perform insurance contract and to meet a business need</p> <p>Special Categories of Personal Data: necessary for insurance purpose, meeting legal and regulatory obligations to prevent fraud</p>
Managing our business operations	<p>Personal Data: necessary for business requirements</p>
Debt Recovery	<p>Personal Data: necessary to meet a business need</p> <p>Special Categories of Personal Data: Necessary for our legal rights</p>

Brokers, Other Intermediaries, Insurers and Reinsurers	
Use of Personal Data	Legal Ground
To enter into business relationships to allow us to place insurance for Ed customers	<p>Personal Data: necessary for the purpose of our contract and to meet a business need</p> <p>Special Categories of Personal Data: Necessary for an insurance purpose</p>
To carry out fraud, sanctions and anti-money laundering checks	<p>Personal Data: necessary for the purpose of our contract and to meet a business need</p> <p>Special Categories of Personal Data: legal and regulatory obligations to prevent fraud and for the purpose of our legal rights</p>
Managing our business operations	<p>Personal Data: necessary to meet a business need</p>

Claims Third Party Agents, Professional Advisors and Experts	
Use of Personal Data	Legal Ground
To assist in relation to any claims under the insurance contract	<p>Personal Data: necessary for the purpose of our contract and to meet a business need</p>
Managing our business operations	<p>Personal Data: necessary to meet a business need</p>

Third Party Claimants	
Use of Personal Data	Legal Ground
To assist with claims handling	Personal Data: necessary for a business need Special Categories of Personal Data: necessary for an insurance purpose
To meet our legal and regulatory obligations including reporting	Personal Data: to meet a legal and regulatory obligation Special Categories of Personal Data necessary for an insurance purpose and for the purposes of our legal rights
Fraud Prevention and Detection	Personal Data: necessary for a business need Special Categories of Personal Data legal and regulatory obligations to prevent fraud and for the purpose of our legal rights
Managing our business operations	Personal Data: necessary for business requirements

Corporate Communications

We also process personal data relating to our Globe directors and shareholders where required to meet our legal, regulatory or contractual obligations. The personal data normally includes personal data such as individual contact details, identification details and financial information where necessary to fulfil these limited purposes.

Who will Globe Share Your Personal Data With?

From time to time, we may share your personal data with other companies in the Ed Group or the third parties below for the purposes set out in this policy and in compliance with our conflict of interest policy:

- Insurers and reinsurers, coverholders, other brokers and intermediaries
- Other third parties who participate in the administration of insurance policies including claims handlers, loss adjustors, lawyers and other experts and professional advisors
- Our own insurers
- Credit reference and fraud detection agencies and other investigators
- Our regulators
- Law enforcement agencies where reasonably required to prevent or detect crime
- Where otherwise required by law or regulation
- Our third party suppliers and service providers

- Third parties relating to any sale, transfer or disposal of our business
- Anyone else you have authorised us to deal with on your behalf.

Transfer of your Personal Data outside the EEA

We may need to transfer your data to other insurance market participants or their affiliates or third party suppliers or service providers located outside the European Economic Area (EEA). These transfers will only be made where we are satisfied that your personal data will be protected. Please contact us, using the details set out in the Contact Details section below, if you would like further details of how your personal data will be protected if transferred outside the EEA.

Our Marketing

We may from time to time provide you with information about our products, services, events or partners which we think you may be interested in. However, we will only do so in accordance with the Privacy and Electronic Communications Regulations, GDPR and other applicable regulations. If you are not a corporate subscriber or you are not subject to the soft opt-in rules for existing individual customers, we will seek your specific consent. An “unsubscribe” link will appear in all our marketing emails. To unsubscribe from emails sent by us, simply click on the link at any time. Alternatively, you can contact us to update your preferences at dataprotection@globeuw.com. Stopping our marketing messages will not stop our service communications. Where necessary, we will continue to send you (non-marketing) service related communications, e.g. renewal notifications.

Our Use of Cookies

This site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience and are useful to track the traffic to and at a website. Most web browsers allow some control of most cookies through the browser settings. To enable or disable cookies, follow the instructions provided by your browser (usually located within the “Help”, “Tools” or “Edit” facility). Please be aware that if you refuse cookies certain functionalities of our Website may not function properly.

We do not use cookies to track people’s Internet usage after leaving our site and we do not store personal information in them. We will not sell or distribute cookie information without your prior consent.

Apart from the cookies used by us (first-party cookies), some of the tools used for analytics and marketing purposes may use cookies (third-party cookies) as explained in more detail below.

Third party cookies

This site uses Google Analytics, one of the most widespread and trusted analytics solution on the web, to help us to understand how you use the site and ways in which we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. This anonymous information collected by the cookies is transmitted to Google. You may refuse the storing of cookies on your computer by using the appropriate setting of your internet browser but

certain services on our site may not then function properly. In addition, you may prevent the collection of the information generated by Google Analytics cookie by downloading and installing the following linked browser plug-in

<http://tools.google.com/dlpage/gaoptout?hl=en>

For additional information concerning Google Analytics, please visit www.google.com/analytics/learn/privacy.html to learn more.

Automated Processing

Where information or a decision is required in relation to your insurance, we make obtain the information or make the decision using automated processing. Where we make automated decisions, you may request that our decision is reviewed by an individual decision maker.

Profiling

We do not carry out profiling.

Retention of your Personal Data

We will only keep your personal data for as long as we reasonably need in order to meet the purposes in this Policy or our legal and regulatory obligations.

Your Rights in relation to your Personal Data

You have the following rights at any time:

- You may request either access to or a copy of any personal data which we hold in relation to you. Unless your request is particularly complicated, we will normally respond within a month of receiving your request. There are certain types of information which we will not be able to provide: for example, legally privileged information or some confidential information.
- You may request that your personal data is rectified if it is inaccurate.
- You may ask us to erase your personal data if you consider that we do not have the right to hold it. However, we may have legal or regulatory obligations which can prevent us from complying with your request.
- You may ask us to restrict processing your personal data in certain circumstances.
- You have the right in certain circumstances to ask us to transfer the personal data you have provided to us to another third party.
- You can object to us processing your personal data if we are relying on the ground that the processing is necessary for the purpose of legitimate interests pursued by Globe in order to carry out that processing
- You can ask that we do not subject you to a decision based on automated processing and to have safeguards in place if you are being profiled based on your personal data. We do not currently carry out profiling.

- You can also withdraw any consent you may have given us to process your personal data. However, it may still be lawful in certain circumstances for Ed to continue processing your personal data even where you have withdrawn your consent.

Your Rights and Contact Details

If you have any questions about this Privacy Policy or the way in which we process your personal data, please contact us on dataprotection@globeuw.com and we will be pleased to help you.

You also have the right to complain to the Information Commissioner's Office if you believe that we have breached applicable data protection laws or regulations. You will find more information on the Information Commissioner's website at www.ico.org.uk/concerns/