



PRIVACY NOTICE

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SECTION ONE

INTRODUCTION

Central Insurance Services Limited (**CIS**), an affiliate of Marsh & McLennan Companies, Inc. (**MMC**), strives to protect the privacy and the confidentiality of Personal Data that the company processes in connection with the services it provides to clients and individuals' use of the CIS websites. CIS's services consist primarily of risk consulting and insurance broking, which enable the consideration of, access to, administration of, and making of claims on, insurance.

To arrange insurance cover and handle insurance claims, CIS and other participants in the insurance industry are required to use and share Personal Data. For an overview of how and why the insurance industry is required to use and share Personal Data please see the [Insurance Market Core Uses Information Notice](#) hosted on the website of a UK insurance industry association, the Lloyd's Market Association (the **LMA Notice**). CIS's use of Personal Data is consistent with the LMA Notice.

During the insurance lifecycle CIS will receive Personal Data relating to potential or actual policyholders, beneficiaries under a policy, their family members, claimants and other parties involved in a claim. Therefore references to "individuals" in this notice include any living person from the preceding list, whose Personal Data CIS receives in connection with the services it provides under its engagements with its clients. This notice sets out CIS's uses of this Personal Data and the disclosures it makes to other insurance market participants and other third parties.

IDENTITY OF CONTROLLER AND CONTACT DETAILS

Central Insurance Services Limited of Crown House, Prospect Road Arnhall Business, Park Westhill, Aberdeenshire, AB32 6FE (**CIS** or **We**) is the controller in respect of the Personal Data it receives in connection with the services provided under the relevant engagement with its client.



PERSONAL INFORMATION THAT WE PROCESS

We collect and process the following **Personal Data**:

- **Individual details** ► name, address (and proof of address), other contact details (e.g. email and telephone details), gender, marital status, family details, date and place of birth, employer, job title and employment history, relationship to the policyholder, insured, beneficiary or claimant;
- **Identification details** ► identification numbers issued by government bodies or agencies (e.g. depending on the country you are in, social security or national insurance number, passport number, ID number, tax identification number, driver's licence number);
- **Financial information** ► payment card number, bank account number and account details, income and other financial information;
- **Insured risk** ► information about the insured risk, which contains Personal Data and may include, only to the extent relevant to the risk being insured:
 - **Health data** ► current or former physical or mental medical conditions, health status, injury or disability information, medical procedures performed, relevant personal habits (e.g. smoking or consumption of alcohol), prescription information, medical history;
 - **Criminal records data** ► criminal convictions, including driving offences; and
 - **Other special categories of Personal Data** ► racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning an individual's sex life or sexual orientation;
- **Policy information** ► information about the quotes individuals receive and the policies they obtain;
- **Credit and anti-fraud data** ► credit history and credit score, information about fraud convictions, allegations of crimes and sanctions details received from various anti-fraud and sanctions databases, or regulators or law enforcement agencies;
- **Previous claims** ► information about previous claims, which may include health data, criminal records data and other special categories of Personal Data (as described in the Insured Risk definition above);
- **Current claims** ► information about current claims, which may include health data, criminal records data and other special categories of Personal Data (as described in the Insured Risk definition above);
- **Marketing data** ► whether or not the individual has consented to receive marketing from us and/or from third parties; and
- **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.

Where we collect such information directly from individuals, we will inform them of whether the information is required and the consequences of not providing it on the relevant form.



SOURCES OF PERSONAL DATA

We collect and receive Personal Data from various sources, including (depending on the service provided and country you are in):

- Individuals and their family members, online or by telephone, or in written correspondence;
- Individuals' employers or trade or professional associations of which they are a member;
- In the event of a claim, third parties including the other party to the claim (claimant/defendant), witnesses, experts (including medical experts), loss adjusters, lawyers and claims handlers;
- Other insurance market participants, such as insurers, reinsurers and other intermediaries;
- Credit reference agencies (to the extent CIS is taking any credit risk);
- Anti-fraud databases and other third party databases, including sanctions lists;
- Government agencies, such as vehicle registration authorities and tax authorities;
- Claim forms;
- Open electoral registers and other publicly available information;
- Business information and research tools;
- Third parties who introduce business to us; and
- Forms on our website and your interactions with our website (please also see our [Cookie Notice](#)).



HOW WE USE AND DISCLOSE YOUR PERSONAL DATA

In this section, we set out the purposes for which we use Personal Data, explain how we share the information, and identify the “legal grounds” on which we rely to process the information.

These “legal grounds” are set out in the General Data Protection Regulation (the **GDPR**), which allows companies to process Personal Data only when the processing is permitted by the specific “legal grounds” set out in the GDPR (the full description of each of the grounds can be found [here](#))

Please note that in addition to the disclosures we have identified in the table below, we will disclose Personal Data for the purposes we explain in this notice to service providers, contractors, advisers, agents and MMC group companies that perform activities on our behalf.



Purpose of Processing	Legal grounds	Disclosures
Quotation/Inception		
Establishing a client relationship, including fraud, anti-money laundering and sanctions checks	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Compliance with a legal obligation • Legitimate interests of CIS (to ensure that the client is within our acceptable risk profile and to assist with the prevention of crime and fraud) For processing special categories of Personal Data (e.g. health information) and criminal records data: <ul style="list-style-type: none"> • Substantial public interest (Insurance purposes) 	<ul style="list-style-type: none"> • Anti-fraud databases
Checking credit where we are taking any credit risk	<ul style="list-style-type: none"> • Legitimate interests of CIS (to ensure that the client is within our acceptable risk profile and to assist with the prevention of crime and fraud) 	<ul style="list-style-type: none"> • Credit reference agencies
Evaluating the risks to be covered and matching to appropriate insurer, policy and premium	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of CIS (to determine the likely risk profile and appropriate insurer and insurance product) For processing special categories of Personal Data (e.g. health information) and criminal records data: <ul style="list-style-type: none"> • Substantial public interest (Insurance purposes) 	<ul style="list-style-type: none"> • Insurers • Insurance intermediaries such as brokers and aggregators • Insurance broking platform providers
Policy Administration		
General client care, including communicating with clients	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of CIS (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) For processing special categories of Personal Data (e.g. health information) and criminal records data: <ul style="list-style-type: none"> • Substantial public interest (Insurance purposes) 	<ul style="list-style-type: none"> • Insurers
Collection or refunding of premiums, paying on claims, processing and facilitating other payments	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of CIS (to recover debts due to us) 	<ul style="list-style-type: none"> • Insurers • Banks • Debt recovery providers
Facilitating premium finance arrangements	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of CIS (ensuring our clients are able to meet their financial obligations) 	<ul style="list-style-type: none"> • Premium Finance Providers • Banks
Claims processing		

Purpose of Processing	Legal grounds	Disclosures
Managing insurance claims	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of CIS (to assist our clients in assessing and making claims) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> • Substantial public interest (Insurance purposes) 	<ul style="list-style-type: none"> • Insurers • Claims handlers • Lawyers • Loss adjusters • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals
Defending or prosecuting legal claims	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of CIS (to assist our client in assessing and making claims) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> • To establish, defend or prosecute legal claims 	<ul style="list-style-type: none"> • Insurers • Claims handlers • Lawyers • Loss adjusters • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals
Investigating and prosecuting fraud	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of CIS (to assist with the prevention and detection of fraud) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> • To establish, defend or prosecute legal claims • Substantial public interest (Insurance purposes) 	<ul style="list-style-type: none"> • Insurers • Lawyers • Police • Experts • Other insurers • Anti-fraud databases • Third parties involved in the investigation or prosecution, such as private investigators
Renewals		
Contacting you in order to arrange the renewal of the insurance policy	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of CIS (to correspond with clients to facilitate the continuation of insurance cover) 	<ul style="list-style-type: none"> • Insurers • Insurance intermediaries such as brokers and aggregators
Throughout the insurance lifecycle		
Marketing analytics and direct marketing, including data anonymisation	<ul style="list-style-type: none"> • Legitimate interests of CIS (to give clients relevant offers) • Where we do not have an existing relationship with the individual, consent 	<ul style="list-style-type: none"> • Insurers • Group companies

Purpose of Processing	Legal grounds	Disclosures
Transferring books of business, company sales and reorganisations	<ul style="list-style-type: none"> Legitimate interests of CIS (to structure our business appropriately) For processing special categories of Personal Data (e.g. health information) and criminal records data: <ul style="list-style-type: none"> Substantial public interest (Insurance purposes) In certain circumstances consent 	<ul style="list-style-type: none"> Group companies Courts Purchaser (potential and actual)
General risk modelling	<ul style="list-style-type: none"> Legitimate interests of CIS (to build risk models that allow placing of risk with appropriate insurers) For processing special categories of Personal Data (e.g. health information) and criminal records data: <ul style="list-style-type: none"> Substantial public interest (Insurance purposes) 	
Complying with our legal or regulatory obligations	<ul style="list-style-type: none"> Compliance with a legal obligation Legitimate interests of CIS (to take pre-emptive steps to ensure legal and regulatory compliance) For processing special categories of Personal Data (e.g. health information) and criminal records data: <ul style="list-style-type: none"> To establish, defend or prosecute legal claims 	<ul style="list-style-type: none"> Insurance, data protection and other regulators Police Insurers Auditors
Website activities		
To communicate with you regarding any queries you raise via the website	<ul style="list-style-type: none"> Legitimate interests of CIS (to correspond with website users) 	
To monitor your interaction with the website to ensure service quality, compliance with procedures and to combat fraud	<ul style="list-style-type: none"> Compliance with a legal obligation Legitimate interests of CIS (to ensure the quality and legality of our online services) For processing special categories of Personal Data and criminal records data: <ul style="list-style-type: none"> Substantial public interest (preventing fraud) 	<ul style="list-style-type: none"> Third parties undertaking online monitoring Anti-fraud databases
To ensure the website content is relevant and presented in the most effective manner for you and your device	<ul style="list-style-type: none"> Legitimate interests of CIS (to provide clients, beneficiaries and claimants with content and services on the website) 	
Testing our insurance software		

<i>Purpose of Processing</i>	<i>Legal grounds</i>	<i>Disclosures</i>
To create test environments within our insurance software system, so that we may assess how to implement updates/changes as necessary	<ul style="list-style-type: none"> Legitimate interests of CIS (to be able to implement insurance software updates/changes in order to provide services as an insurance broker and risk consultant) 	<ul style="list-style-type: none"> Software providers

SPECIAL CATEGORIES OF PERSONAL DATA AND CRIMINAL DATA

When we collect, use or disclose to third parties (such as insurers, intermediaries and reinsurers) Special Categories of Personal Data and Criminal Records Data for the reasons set out in the table above and for profiling as set out in the next section, we typically do so for reasons of substantial public interests, namely because it is necessary for the wide range of insurance-related activities that we undertake or because it is necessary for fraud prevention purposes.

Before you provide us with Special Categories of Personal Data and Criminal Records Data about a person other than yourself, you agree to notify such person of our use of their Personal Data and, if requested by us, to obtain their consent to our use of their Special Categories of Personal Data and Criminal Records Data (for example, by requiring the individual to sign a consent form).



PROFILING AND AUTOMATED DECISION MAKING

Insurance premiums are calculated by insurance market participants benchmarking clients' and beneficiaries' attributes as against other clients' and beneficiaries' attributes and propensities for insured events to occur. This benchmarking requires CIS and other insurance market participants to analyse and compile information received from all insureds, beneficiaries or claimants to model such propensities. Accordingly, we may use Personal Data to both match against the information in the models and to create the models that determine the premium pricing in general and for other insureds. CIS and other insurance market participants may use special categories of Personal Data and criminal records data for such modelling to the extent it is relevant, such as medical history for life insurance or past motor vehicle convictions for motor insurance.

CIS and other insurance market participants use similar predictive techniques to assess information that clients and individuals provide to understand fraud patterns, the probability of future losses actually occurring in claims scenarios, and as set out below.

We use these models only for the purposes listed in this Privacy Notice. In most cases, our staff make decisions based on the models.

- **Automated broking platform**

Where clients use the automated broking platform, insurance quotations are offered entirely by matching whether the attributes that the client has provided meet the criteria set by the insurers, which determines (a) whether a quotation will be made; (b) on what terms; and (c) at what price. Each insurer will use different algorithms to determine their pricing, and clients must consult each insurer's privacy policy for further details. Our platform merely queries whether attributes of potential insureds satisfy insurers' models and then returns the results. If the potential insured's attributes do not satisfy insurers' models, the quotation request is referred for review by a team with underwriting authority. We also apply fraud prediction algorithms to the information clients provide to assist us in detecting and preventing fraud. We regularly review all profiling and associated algorithms against inaccuracies and bias.

These partially automated processes may result in a client not being offered insurance or affect the price or terms of the insurance.

Clients may request that we provide information about the decision-making methodology and ask us to verify that the automated decision has been made correctly. We may reject the request, as permitted by applicable law, including when providing the information would result in a disclosure of a trade secret or would interfere with the prevention or detection of fraud or other crime. However, generally in these circumstances we will verify that the algorithm and source data are functioning as anticipated without error or bias.



SAFEGUARDS

We have in place physical, electronic, and procedural safeguards appropriate to the sensitivity of the information we maintain. These safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the Personal Data, and include measures designed to keep Personal Data protected from unauthorised access. If appropriate, the safeguards include the encryption of communications via Secure Sockets Layer, encryption of information during storage, firewalls, access controls, separation of duties, and similar security protocols. We restrict access to Personal Data to personnel and third parties that require access to such information for legitimate, relevant business purposes.



LIMITING COLLECTION AND RETENTION OF PERSONAL INFORMATION

We collect, use, disclose and otherwise process Personal Data that is necessary for the purposes identified in this Privacy Notice or as permitted by law. If we require Personal Data for a purpose inconsistent with the purposes we identified in this Privacy Notice, we will notify clients of the new purpose and, where required, seek individuals' consent (or ask other parties to do so on CIS's behalf) to process Personal Data for the new purposes.

Our retention periods for Personal Data are based on business needs and legal requirements. We retain Personal Data for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When Personal Data is no longer needed, we either irreversibly anonymise the data (in which case we may further retain and use the anonymised information) or securely destroy the data.



CROSS-BORDER TRANSFER OF PERSONAL INFORMATION

CIS transfers Personal Data to, or permits access to Personal Data from, countries outside the European Economic Area (EEA). These countries' data protection laws do not always offer the same level of protection for Personal Data as offered in the EEA. We will, in all circumstances, safeguard Personal Data as set out in this Privacy Notice.

[Certain countries](#) outside the EEA have been approved by the European Commission as providing essentially equivalent protections as EEA data protection laws. EU data protection laws allow CIS to freely transfer Personal Data to such countries.

If we transfer Personal Data to other countries outside the EEA, we will establish legal grounds justifying such transfer, such as MMC Binding Corporate Rules (<http://www.mmc.com/privacy-policy.html>), model contractual clauses, individuals' consent, or other legal grounds permitted by applicable legal requirements.

Individuals can request additional information about the specific safeguards applied to the export of their Personal Data.



ACCURACY, ACCOUNTABILITY, OPENNESS AND YOUR RIGHTS

We strive to maintain Personal Data that is accurate, complete and current. Individuals should contact us at dataprotection@marsh.com to update their information.

Questions regarding CIS's privacy practices should be directed to the Data Protection Officer using the contact details in the Questions, Requests or Complaints section below.

Under certain conditions, individuals have the right to request that CIS:

- provide further details on how we use and process their Personal Data;
- provide a copy of the Personal Data we maintain about the individual;
- update any inaccuracies in the Personal Data we hold;
- delete Personal Data that we no longer have a legal ground to process; and
- restrict how we process the Personal Data while we consider the individual's enquiry.

In addition, under certain conditions, individuals have the right to:

- where processing is based on consent, withdraw the consent;

- object to any processing of Personal Data that Marsh justifies on the “legitimate interests” legal grounds, unless our reasons for undertaking that processing outweigh any prejudice to the individual’s privacy rights; and
- object to direct marketing (including any profiling for such purposes) at any time.

These rights are subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). We will respond to most requests within 30 days.

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.



QUESTIONS, REQUESTS OR COMPLAINTS

To submit questions or requests regarding this Privacy Notice or CIS’s privacy practices, please write to the Data Protection Officer at the following address:

The Data Protection Officer
Central Insurance Services Limited
Crown House
Prospect Road
Arnhall Business
Park Westhill
Aberdeenshire
AB32 6FE
Phone: 020 7357 1000
Email: dataprotection@marsh.com



LINKS TO THIRD PARTY WEBSITES

Our websites may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. Please check these policies before you submit any personal information to such third party websites.



CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice is subject to change at any time. It was last changed on 29th June 2018. If we make changes to this Privacy Notice, we will update the date on which it was last changed. Where we have an engagement with you, we will notify you of any changes we make to this Privacy Notice in accordance with the notice provisions in the terms of our engagement. In other circumstances, we will publish the revised Privacy Notice on our website.

Appendix

List of the legal grounds we rely on:

For processing personal data and special categories of personal data	
Legal ground	Details
Performance of our contract with you	Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject.
For our legitimate business interests	Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where you are a child. These legitimate interests are set out next to each purpose.
For processing special categories of Personal Data	
You explicit consent	You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent, by contacting our Data Protection Contact. However withdrawal of this consent may impact our ability to provide the services. For more detail see the Consent section above.
For legal claims	Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
Substantial public interest	Processing is necessary for reasons of substantial public interest, on the basis of EU or UK law, including where such processing is necessary for insurance purposes or fraud prevention purposes...





Registered in England and Wales Number: 1507274, Registered Office: 1 Tower Place West, Tower Place, London EC3R 5BU

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GRAPHICS NO. 17-0956a