

Data Protection Privacy Notice

We collect and use personal data you so that we can provide you with an insurance policy that suits your insurance needs. This notice explains the most important aspects of how we use your data and what rights you have in relation to your personal data.

The data controller responsible for this personal data is Guardian Group Fatum as the insurer of the product. Additional controllers include your intermediary/broker who is responsible for the sale and distribution of the product and any applicable reinsurers.

Personal Data we use

Where appropriate, we may collect the following personal data from and/or about you:

- **Your data:** We use personal data such as name and contact details (Personal Data) and sensitive personal data such as medical details (Sensitive Data).
- **Other people's data:** As well as collecting personal data about you, we may also use personal data about other people, for example family members you wish to insure on a policy (please ensure you have the necessary permission before providing this data, they can also contact us for further information)
- **Claims data:** If a claim is made, we may also collect personal information about the claim from you and any relevant third parties.
- **Health data:** We may need to ask for details relating to your health data or the health data of somebody else covered under your policy.
- **Criminal conviction data:** We may ask for details relating to any unspent criminal convictions you and anybody else covered under your policy may have.

How we use your personal information

Purpose for which it is used	Our legal basis for using it
To provide a quote, including making a decision as to whether we can provide you with cover and at what price.	<ul style="list-style-type: none"> • To take steps at your request prior to entering into your policy. • Consent where another person provides your data to us so that we can provide them with a quote.
To verify your identity.	<ul style="list-style-type: none"> • To administer the policy. • To take steps at your request prior to entering into a policy. • To comply with our legal obligations.
To provide you with insurance cover and administer your insurance policy, including dealing with any queries or changes, payments, renewals and processing a cancellation of your policy.	<ul style="list-style-type: none"> • To administer the policy.
To validate, investigate and/or process any claims you or another person makes in relation to your insurance policy.	<ul style="list-style-type: none"> • To administer the policy. • To comply with our legal obligations.
To maintain arrangements, we have with reinsurers.	<ul style="list-style-type: none"> • For our legitimate interests in managing our business.
For management information purposes including portfolio assessment, risk assessment, performance reporting and management reporting.	
For a proposed portfolio transfer, reorganisation, transfer, disposal or other transaction relating to our business.	
To detect and prevent fraud.	<ul style="list-style-type: none"> • For our legitimate interests in managing our business. • To administer the policy. • To comply with our legal obligations.
To comply with laws and regulations.	<ul style="list-style-type: none"> • To comply with our legal obligations.

Data collected from third parties

We may collect personal data from third parties if you engage with us through a third party, for example through a broker or, in the case of a group scheme, through your employer. We may also obtain data from other third parties such as financial institutions, claims service providers (including private investigators), other insurers, databases and/or other duly authorized bodies for the purposes described above.

Sharing of your Personal Data

We may share your Data (where appropriate/applicable) as follows:

- With business partners, suppliers, sub-contractors and agents with whom we work and/or engage to assist us in carrying out business activities which are in our legitimate business interests and where such interests are not overridden by your interests.
- With reinsurers who provide reinsurance service to Guardian Group Fatum.
- With other insurers and/or their agents.
- With any intermediary or third party acting for you.
- In order to comply with our legal obligations, a Court Order or to cooperate with regulatory bodies as well as with relevant government departments and law enforcement agencies.
- On the sale, transfer or reorganisation of our Group's business (or any part of it).
- Where you have consented to our doing so, we may share and sync information that you provide to companies within the Guardian Group or our parent company (NCB Financial Group Limited) so we and they may contact you in order to tell you about carefully selected products, services or offers that we believe will be of interest to you.

How we secure and transfer your personal data to other countries

The Guardian Group Fatum have physical, electronic, and managerial procedures to safeguard and secure your personal data. As a global business we ensure that personal data is equally protected in all locations by complying with respective data protection laws of territories where we operate. Additionally, our contracts with external third parties require them to provide equivalent levels of protection for personal data to the same standards we abide by.

How long we hold your personal data for

We retain personal data for as long as is necessary to meet the purposes for which it was originally collected or to satisfy our legal obligations.

Data subject rights

You have the following rights in relation to your Data which is held by us:

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| <ul style="list-style-type: none">• To ask for details of your Data held by us.• To ask for a copy of your Data.• To have any inaccurate or misleading Data rectified.• To have your Data erased.• To restrict the processing of your Data in certain circumstances. | <ul style="list-style-type: none">• To object to the processing of your Data.• To transfer your Data to a third party.• A right not to be subject to automated decision making.• The right to receive notification of a Data breach.• Where processing is based on consent, the right to withdraw such consent. |
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Note: you have the right to object to use of personal data based on legitimate business interests. If you do object, we will have an opportunity to demonstrate that there are compelling legitimate grounds which override your rights and freedoms or that processing is necessary for the establishment, exercise or defence of legal claims. Please note that any successful objection may prevent us assessing future claims and/or the policy may be cancelled.

If you wish to avail of these rights, a request must be submitted in writing to our Data Protection Officer (see contact details below). In order to protect your privacy, you may be asked to provide suitable proof of identification before we can process your request.

Guardian Group Privacy Policy

Please note that this Data Protection Notice is not a standalone section and should be reviewed in conjunction with our Privacy Policy which is available online https://myguardiangroup.com/nl_privacy-policy.

Data Protection Officer Contact details

If you have any questions about your Data, you can contact our Data Protection Officer, using the contact details below.

- Chantal Castablanco through the following email address: chantal.castablanco@myguardiangroup.com

WE CARE ABOUT YOUR PERSONAL DATA PROTECTION

An abridged version of our Data Protection Notice attached to this form explains how we protect your privacy. This is an important notice which outlines how we will process your personal data. You should read it before submitting any personal data to us. To read our full Privacy Notice, visit: https://myguardiangroup.com/nl_privacy-policy.

Alternatively, you can contact us at:

- +5999 777 7777 (Curaçao office)
- +297 528-3100 (Aruba Office)
- +599 717 8811 (Bonaire office)
- +721 542 2248 (Sint Maarten office)
- +31 010 798 8445 (Netherlands office)

to request a paper copy of our full Privacy Notice. If you have any queries about how we use your personal data, you can always contact us by email at: chantal.castablanco@myguardiangroup.com