Information Notice_SAFE

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Safe Forsikring Information Notice

This notice sets out the following:

SAFE FORSIKRING AS – HOW WE USE YOUR PERSONAL DATA

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2 – THE DATA WE MAY COLLECT ABOUT YOU (YOUR PERSONAL DATA)

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5 – THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

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How SAFE Forsikring AS uses your personal data

This section explains how SAFE Forsikring AS processes your personal data. Where it differs from the general insurance-market information in the rest of this notice, this section applies.

Who we are

SAFE Forsikring AS (org. no. 998 890 365), Thunes vei 2, 0274 Oslo, Norway, is the data controller. We are an insurance intermediary and Lloyd's coverholder arranging marine, aquaculture and energy insurance for companies.

Whose data we hold and what data

Our clients are companies. We hold personal data about people who act for them or deal with us in a professional role: client representatives, directors, signatories and beneficial owners, and contacts at brokers, insurers, reinsurers and loss adjusters.

- **Contact details:** name, job title, employer, business email and phone number.
- **Screening data:** date of birth, nationality, and the results of sanctions, politically exposed person (PEP) and adverse-media checks.

We do not collect health data or other special categories of personal data, government identification numbers, or bank or payment card details about you.

Sources: you, your employer, brokers and other insurance market participants, and sanctions, PEP and media databases accessed through our screening providers.

Why we use your data and our lawful basis

Purpose	Lawful basis (GDPR)

Placing, administering and renewing insurance for the company you represent, and communicating about cover	Legitimate interest (Art. 6(1)(f)) in arranging and servicing insurance for corporate clients
Handling claims	Legitimate interest (Art. 6(1)(f))
Customer due diligence and sanctions, PEP and adverse-media screening	Legal obligation (Art. 6(1)(c)) under the Anti-Money Laundering Act (hvitvaskingsloven) and sanctions law. Information about criminal offences found in adverse-media checks is processed as authorised by the Anti-Money Laundering Act (Art. 10)
Regulatory reporting, audits and bookkeeping	Legal obligation (Art. 6(1)(c))
Maintaining business relationships with brokers, insurers and partners	Legitimate interest (Art. 6(1)(f))

We do not rely on your consent to process your personal data. Where we rely on legitimate interest, you may object (see Your rights).

Who we share your data with

- **Insurance market participants:** insurers, Lloyd's syndicates and managing agents, reinsurers, brokers and loss adjusters, as needed to place and service cover. Each is an independent controller of the data it receives. We are bound by a duty of confidentiality under the Insurance Mediation Act (forsikringsformidlingsloven § 8-8).
- **Service providers acting on our instructions:** IT, cloud and backup services, screening tools, and accounting and payroll services, all under data processing agreements.
- **Authorities:** the Financial Supervisory Authority of Norway (Finanstilsynet) and the Norwegian Financial Intelligence Unit (Enheten for finansiell etterretning, Økokrim), where the law requires it.

Transfers outside the EEA

We place some insurance through the London market and brokers worldwide. Transfers to the United Kingdom rely on the European Commission's adequacy decision for the UK. Transfers to other countries outside the EEA rely on the European Commission's standard contractual clauses. You can request a copy of the relevant safeguards from the contact below.

How long we keep your data

Data	Retention period
Contact details	As per Policy, placement and claims files
Policy, placement and claims files	10 years after the policy expires or the last claim closes, whichever is later
Screening records	5 years after the client relationship ends (Anti-Money Laundering Act § 30)
Accounting records	5 years after the end of the financial year (Bookkeeping Act)

Records linked to an open claim, dispute or regulatory inquiry are kept until the matter is closed.

Automated decisions and profiling

We do not make decisions about you by automated means or use your data for profiling. Every possible match in our screening is reviewed by a person.

Your rights

You have the right to:

- access the personal data we hold about you;
- have inaccurate data corrected;
- have data erased when we no longer have a lawful basis to keep it;
- restrict our use of your data while a complaint is being looked into; and
- object to processing based on legitimate interest.

Some rights are limited for screening records. We must keep them for the period the Anti-Money Laundering Act requires, and the law may prevent us from disclosing information about reports made to the authorities.

Contact and complaints

To exercise your rights or ask questions, contact Espen Stange, es@safeforsikring.as, +47 97 00 58 02.

You may also complain to the Norwegian Data Protection Authority (Datatilsynet), PO Box 458 Sentrum, 0105 Oslo, Norway: https://www.datatilsynet.no/klageskjema_direkte/

General

Insurance is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to do this, information, including your personal data, needs to be shared between different insurance market participants. The insurance market is committed to safeguarding that information.

This notice is designed to help you understand how the insurance market participants process your personal data through the insurance.

In this notice:

we, **us** or **our** refers to the relevant insurance market participant

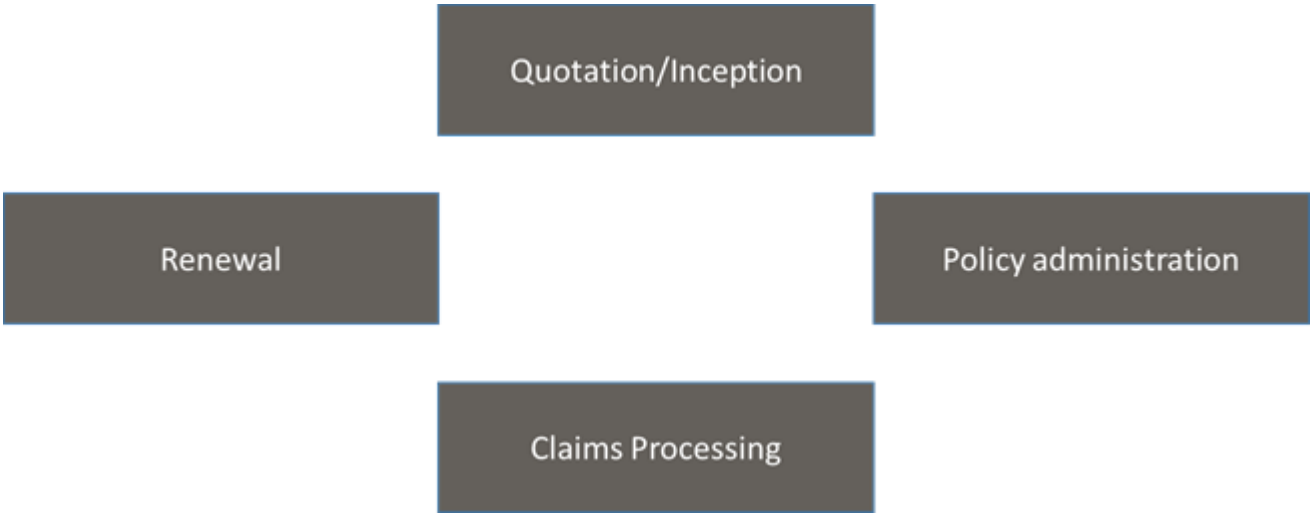
you or **your**, refers to the individual whose personal data may be processed by an insurance market participant (you may be the insured, beneficiary, claimant or other person involved in a claim or relevant to a policy).

There are other terms in ***bold*** with specific meanings. Those meanings can be found in the glossary below.

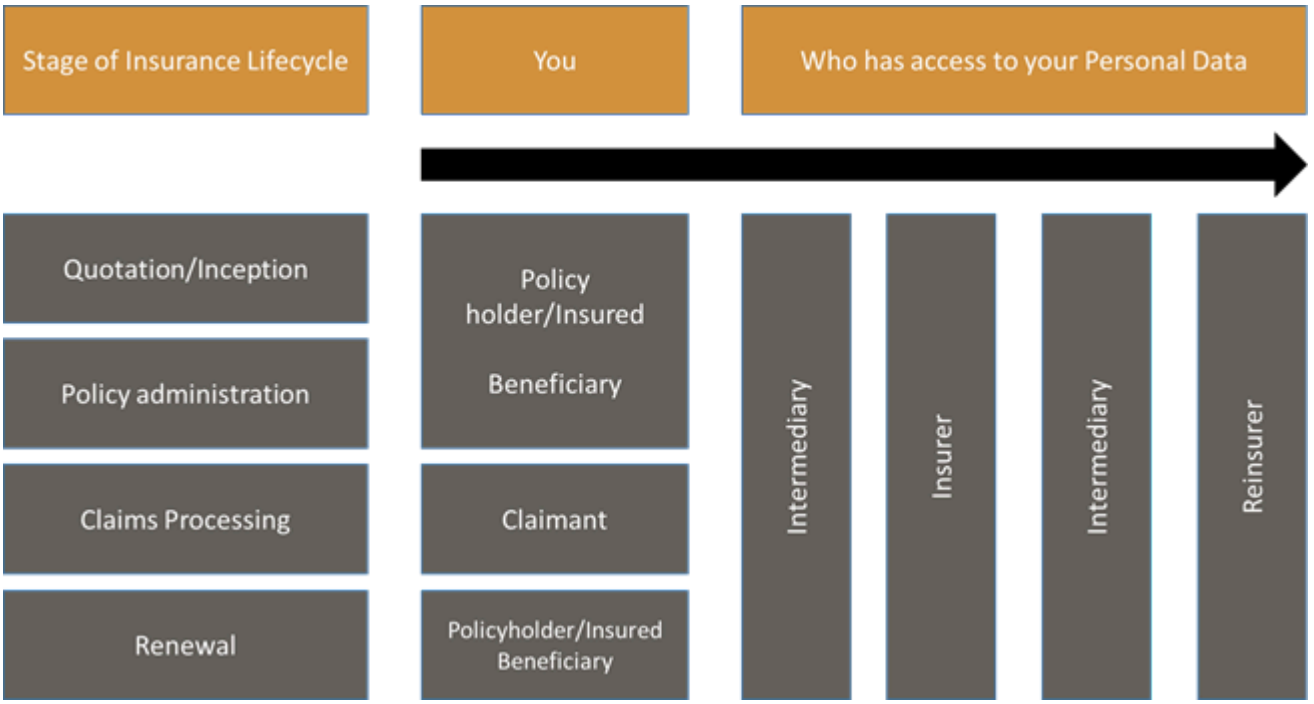
SECTION 1 INTRODUCTION

How the insurance market works:

INSURANCE LIFECYCLE



FLOWS OF PERSONAL DATA THROUGH THE INSURANCE LIFECYCLE



SECTION 2 THE DATA WE MAY COLLECT ABOUT YOU (YOUR PERSONAL DATA)

In order for us to provide insurance quotes, insurance policies, and/or deal with any claims or complaints, we need to collect and process personal data about you. The types of personal data that are processed may include:

Types of Personal Data	**Details**
Individual details	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to **you**

Identification details	Identification numbers issued by government bodies or agencies, including **your** national insurance number, passport number, tax identification number and driving licence number
Financial information	Bank account or payment card details, income or other financial information
Risk details	Information about **you** which **we** need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to **your** health, criminal convictions, or other **special categories of personal data.** For certain types of policy, this could also include **telematics data**.
Policy information	Information about the quotes **you** receive and policies **you** take out
Credit and anti-fraud data	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to **you**
Previous and current claims	Information about previous and current claims, (including other unrelated insurances),which may include data relating to **your** health, criminal convictions, or other **special categories of personal data** and in some cases, surveillance reports
Special categories of personal data	Certain categories of **personal data** which have additional protection under the **GDPR**. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation

SECTION 3 WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

We might collect your personal data from various sources, including:

- you;
- your family members, employer or representative;
- other insurance market participants;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies such as the DVLA and HMRC;
- open electoral register; or

- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers

Which of the above sources apply will depend on your particular circumstances.

SECTION 4 IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS

The insurance lifecycle involves the sharing of your personal data between insurance market participants, some of which you will not have direct contact with. In addition, your personal data may not have been collected directly by an insurance market participant.

You can find out the identity of the initial data controller of your personal data within the insurance market life-cycle in the following ways:

- Where you took out the insurance policy yourself: the insurer and, if purchased through an intermediary, the intermediary will be the initial data controller and their data protection contact can advise you on the identities of other insurance market participants that they have passed your personal data to.

- Where your employer or another organisation took out the policy for your benefit: you should contact your employer or the organisation that took out the policy who should provide you with details of the insurer or intermediary that they provided your personal data to and you should contact their data protection contact who can advise you on the identities of other insurance market participants that they have passed your personal data to

- Where you are not a policyholder or an insured: you should contact the organisation that collected your personal data who should provide you with details of the relevant participant's data protection contact.

SECTION 5 THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

We set out below the purposes insurance market participants might use your personal data for:

Quotation/Inception

Purpose	Legal basis
Setting you up as a client, including fraud, sanctions, credit and anti-money laundering checks	Art. 6(1)(c) – compliance with a legal obligation (AML/sanctions legislation); Art. 6(1)(f) – legitimate interest (fraud prevention)
Evaluating the risk to be covered and matching to appropriate policy/premium	Art. 6(1)(b) – necessary for entering into a contract at your request
Payment of premium (individual insured/policyholder)	Art. 6(1)(b) – performance of a contract

Policy administration

Purpose	Legal basis
Client care, communications, updates	Art. 6(1)(b) – performance of a contract
Payments to and from individuals	Art. 6(1)(b) – performance of a contract

Claims processing

Purpose	Legal basis
Managing insurance and reinsurance claims	Art. 6(1)(b) – performance of a contract
Defending or prosecuting legal claims	Art. 6(1)(f) – legitimate interest (establishment, exercise or defence of legal claims)
Investigating or prosecuting fraud	Art. 6(1)(c) – legal obligation; Art. 6(1)(f) – legitimate interest

Renewals

Purpose	Legal basis
Contacting you to renew	Art. 6(1)(b) – performance/renewal of a contract; Art. 6(1)(f) – legitimate interest (retaining clients)
Evaluating risk and premium	Art. 6(1)(b) – performance of a contract

Other purposes

Purpose	Legal basis
Complying with legal or regulatory obligations	Art. 6(1)(c) – legal obligation
General risk modelling	Art. 6(1)(f) – legitimate interest (actuarial/statistical purposes necessary to price and manage risk)
Transferring books of business, company sales & reorganisations	Art. 6(1)(f) – legitimate interest (business continuity in event of transfer/restructuring)

Please note that in addition to the disclosures we have identified against each purpose, we may also disclose personal data for those purposes to our service providers, contractors, agents and group companies that perform activities on our behalf.

SECTION 6 PROFILING AND AUTOMATIC DECISION MAKING

When calculating insurance premiums insurance market participants may compare your personal data against industry averages. Your personal data may also be used to create the industry averages going forwards. This is known as profiling and is used to ensure premiums reflect risk.

Profiling may also be used by insurance market participants to assess information you provide to understand fraud patterns.

Where special categories of personal data are relevant, such as medical history for life insurance or past motoring convictions for motor insurance, your special categories of personal data may also be used for profiling.

Insurance market participants might make some decisions based on profiling and without staff intervention (known as automatic decision making). Insurance market participants will provide details of any automated decision making they undertake without staff intervention in their information notices and upon request including:

- where they use such automated decision making
- the logic involved
- the consequences of the automated decision making
- any facility for you to have the logic explained to you and to submit further information so the decision may be reconsidered.

SECTION 7 RETENTION OF YOUR PERSONAL DATA

We will keep your personal data only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either you or we may wish to bring a legal claim under this insurance, or where we are required to keep your personal data due to legal or regulatory reasons.

SECTION 8 INTERNATIONAL TRANSFERS

We may need to transfer your data to insurance market participants or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the GDPR.

If you would like further details of how your personal data would be protected if transferred outside the EEA, please contact the data protection contact of the relevant participant.

SECTION 9 YOUR RIGHTS AND CONTACT DETAILS OF THE SUPERVISORY AUTHORITIES

If you have any questions in relation to our use of your personal data, you should first contact the data protection contact of the relevant participant. Under certain conditions, you may have the right to require us to:

- provide you with further details on the use we make of your personal data/special category of data;
- provide you with a copy of the personal data that you have provided to us;
- update any inaccuracies in the personal data we hold;
- delete any special category of data/personal data that we no longer have a lawful ground to use;
- where processing is based on consent, to withdraw your consent so that we stop that particular processing;
- object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data

protection rights; and

- restrict how we use your personal data whilst a complaint is being investigated.

In certain circumstances, we may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

The contact person at Safe Forsikring AS is:

Espen Stange
es@safeforsikring.as

+47 97 00 58 02

YOUR RIGHT TO COMPLAIN TO A SUPERVISORY AUTHORITY

If you are not satisfied with our use of your personal data or our response to any request by you to exercise any of your rights in SECTION 9, or if you think that we have breached the GDPR, then you have the right to complain to a supervisory authority. Please see below for contact details of the supervisory authorities.

Norway:

Datatilsynet

PO Box 458 Sentrum

0105 Oslo

Norway

https://www.datatilsynet.no/klageskjema_direkte/

England:
Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or

01625 545 745 (national rate)

Email: casework@ico.org.uk

SECTION 10: GLOSSARY

Key insurance terms:

Beneficiary is an individual or a company that an insurance policy states may receive a payment under the insurance policy if an insured event occurs. A beneficiary does not have to be the insured/policyholder and there may be more than one beneficiary under an insurance policy

Claimant is either a beneficiary who is making a claim under an insurance policy or an individual or a company who is making a claim against a beneficiary where that claim is covered by the insurance policy

Claims processing is the process of handling a claim that is made under an insurance policy

Coverholder is an intermediary authorised by a Lloyd's managing agent to enter into insurance contracts on behalf of Lloyd's syndicates.

Inception is when the insurance policy starts

Insurance is the pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of insurance. The expression insurance may also mean reinsurance

Insurance policy is a contract of insurance between the insurer and the insured/policyholder

Insurance market participant(s) or **participants**: is an intermediary, insurer or reinsurer

Insured/policyholder is the individual or company in whose name the insurance policy is issued. A potential insured/policyholder may approach an intermediary to purchase an insurance policy.

Insurers: (sometimes also called underwriters) provide insurance cover to insured/policyholders in return for premium. An insurer may also be a reinsurer.

Intermediaries help policyholders and insurers arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through intermediaries

Lloyd's: many policies are underwritten in Lloyd's of London. Lloyd's is a specialist insurance market place. To find out more about how Lloyd's operates please visit www.Lloyds.com

Policy administration is the process of administering and managing an insurance policy following its inception Premium is the amount of money to be paid by the insured/policyholder to the insurer in the insurance policy

Politically exposed person (PEP) is a person who holds or has held a prominent public function, and their close family members and known close associates.

Quotation is the process of providing a quote to a potential insured/policyholder for an insurance policy

Reinsurers provide insurance cover to another insurer or reinsurer. That insurance is known as reinsurance

Renewal is the process of the insurer under an insurance policy providing a quotation to the insured/policyholder for a new insurance policy to replace the existing one on its expiry

Standard contractual clauses are contract terms approved by the European Commission that protect personal data transferred to countries outside the EEA.

We, us or our refers to the relevant insurance market participant. In the SAFE-specific section at the start of this notice, it refers to SAFE Forsikring AS.

You or **your** refers to the individual whose personal data may be processed by an insurance market participant. You may be the insured, beneficiary, claimant or other person involved in a claim or relevant to an insurance policy

Key data protection terms:

GDPR: means the EU General Data Protection Regulation (Regulation (EU) 2016/679), which applies in Norway through the Personal Data Act (personopplysningsloven). For insurance market participants in the United Kingdom, the equivalent rules are the UK GDPR and the Data Protection Act 2018.

Adequacy decision is a decision by the European Commission that a country outside the EEA protects personal data to a standard essentially equivalent to the GDPR, so data can be transferred there without further safeguards.

Adverse media means news and other published information linking a person to financial crime or other offences.

Beneficial owner is the individual who ultimately owns or controls a company.

Data controller is the organisation that decides why and how personal data is processed.

Data processor is an organisation that processes personal data on behalf of, and on the instructions of, a data controller.

EEA is the European Economic Area: the EU member states plus Norway, Iceland and Liechtenstein.

Supervisory authority is the public authority that oversees data protection. In Norway this is Datatilsynet; in

the UK it is the Information Commissioner's Office (ICO).