

Privacy Notice

Lockton (MENA) LIMITED

Last Updated: 1st May 2024

Lockton (MENA) Limited and all its subsidiaries in the Middle East and North Africa is committed to protecting the privacy and security of your personal data.

PURPOSE OF THIS DOCUMENT

This notice describes how **we**, as an **intermediary**, collect and use **personal data** about **you** during and after **your** engagement with us, in accordance with the Data Protection Laws. In particular this notice is designed to help **you** understand how **we** process **your personal data** through the **insurance lifecycle**. **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 also aims to give **you** information on how Lockton collects and **processes your personal data** through **your** use of this website, including any data **you** may provide through this website, for example when **you** sign up to our newsletter or fill in our contact us form. In particular, this notice, together with the Terms of Use and Cookies Notice sets out how **we** look after **your personal data** when **you** visit **our** website (regardless of where **you** visit it from) and tells **you** about **your** privacy rights and how the law protects **you**.

Lockton is committed to protecting the privacy needs of children and encourages parents and guardians to take an active role in their children's online activities and interests. Lockton **does not** intentionally collect information from children, and Lockton **does not** target its website to children.

It is important that **you** read this notice, together with any other privacy notice **we** may provide on specific occasions when **we** are collecting or **processing personal data** about **you**, so that **you** are aware of how and why **we** are using such information. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Lockton (MENA) Limited is a "**data controller**". This means that **we** are responsible for deciding how **we** hold and use **personal data** about you. **We** are required under the Data Protection Laws to notify **you** of the information contained in this privacy notice.

If **you** have any questions about this privacy notice, including any requests to exercise **your** legal rights, please contact **our Compliance Manager** using the details set out below:

CONTACT DETAILS

Compliance Manager
Lockton (MENA) Limited
Suite 201, Gate Village 6, DIFC,
Dubai
United Arab Emirates

Phone Number: +971(0)4 373 8777
Email: compliance.mena@lockton.com

CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This notice may be updated from time to time. We encourage you to review this notice regularly when you visit our website to learn more about how we are using your **personal data** and safeguarding your privacy.

This version is dated [01 May 2024].

It is important that the **personal data we** hold about **you** is accurate and current. Please keep **us** informed if **your personal data** changes during **your** relationship with **us**.

THIRD PARTY LINKS

Our website may, from time to time, contain links to and from third-party websites, plug-ins, and applications, including without limitation websites of our partner networks and affiliates. Clicking on those links may allow third parties to collect or share data about you. Please note that these third-party websites have their own privacy notices and we do not control those websites or accept any responsibility or liability for these privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit. This notice is specific to our website.

DEFINED TERMS

In this notice:

we, us or **our** refers to Lockton MENA Limited, a private company, with commercial license number CL0970 and its registered office at Suite 201, Gate Village 6, Dubai International Financial Centre (**DIFC**), Dubai United Arab Emirates, an independent insurance and reinsurance intermediary authorised and regulated in the DIFC by the Dubai Financial Services Authority (DFSA) under Firm Reference Number F001336 and all its subsidiaries in the MENA Region;

you or **your**, refers to the individual whose **personal data** may be processed by **us** and other **insurance market participants** (**you** may be a potential or actual policyholder, **insured, beneficiary** under a policy, their family member, **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 [Section 11: Glossary of Key Terms](#).

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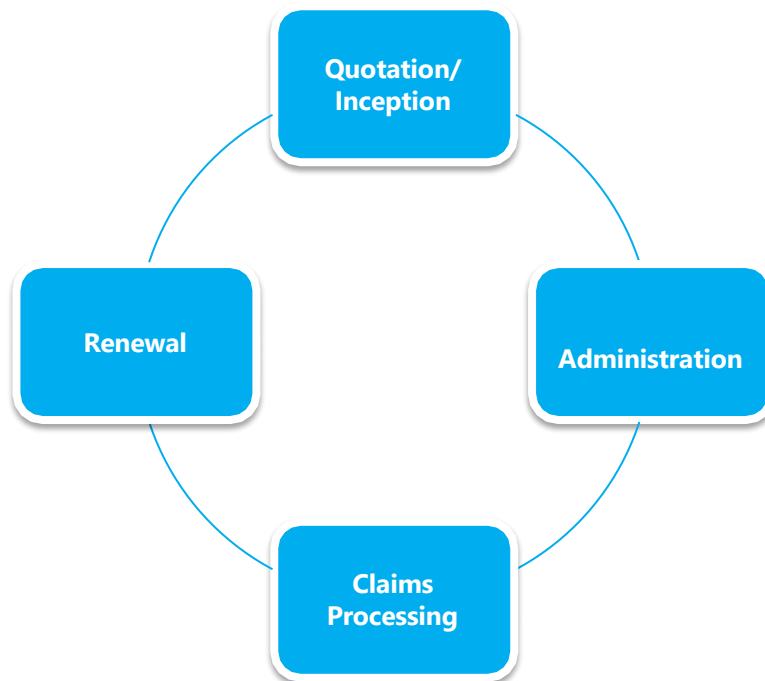
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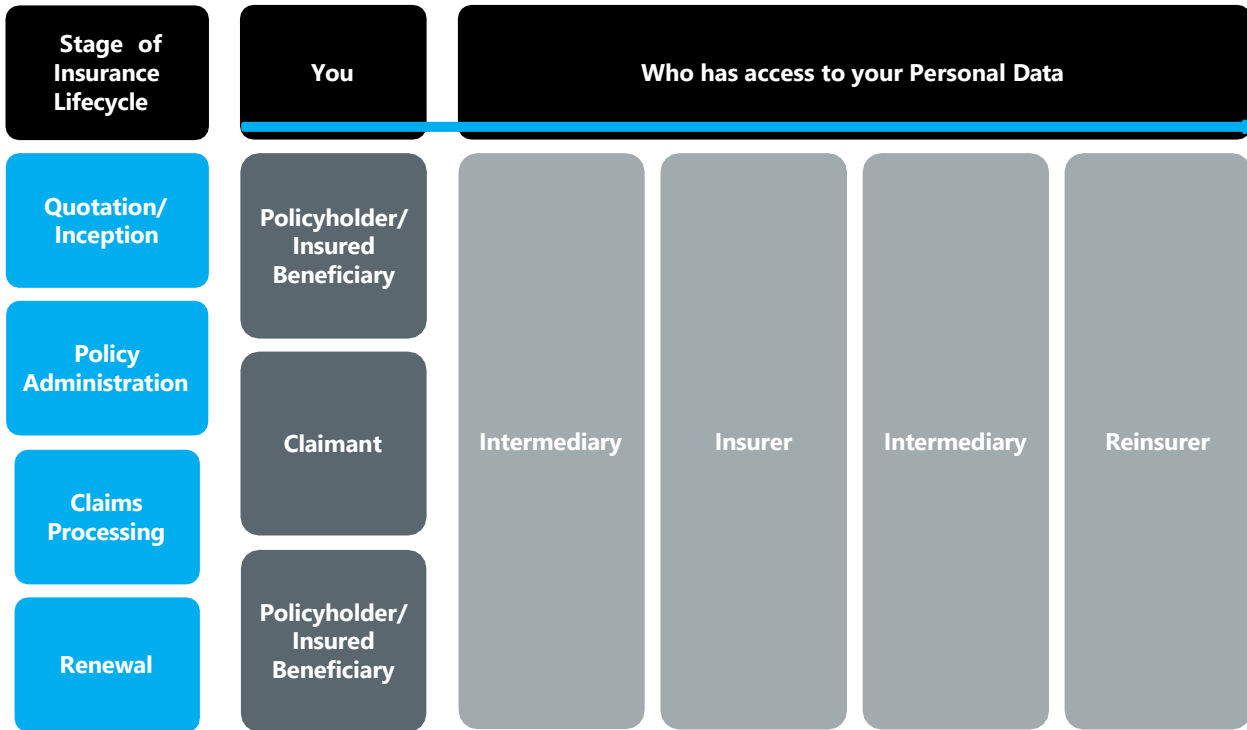
SECTION 11: GLOSSARY OF KEY TERMS

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 obtain insurance quotes, place and administer 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 license 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, only to the extent relevant to the risk being insured. 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 and sanctions databases, or regulators or law enforcement agencies 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 DIFC Data Protection Law and UAE Data Protection Law. 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.
Technical data ▶	internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
Usage data ▶	Information about how you use our website, products, and services, including information from your visit from cookies, such as clickstream to, through and from our website (including date and time), items you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as clicks), and methods used to browse away from the page.
Marketing and communications data ▶	Your preference in receiving marketing material from us and third parties and your communication preferences.

Personal data does not include data where the identity has been removed (anonymous data).

We also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from **your personal data** but is not considered **personal data** in law as this data does **not** directly or indirectly reveal **your** identity. However, if **we** combine or connect aggregated data with **your personal data** so that it can directly or indirectly identify **you**, **we** treat the combined data as **personal data** which will be used in accordance with this privacy notice.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where **we** need to collect **personal data** by law, or under the terms of a contract **we** have with **you** and **you** fail to provide that data when requested, **we** may not be able to perform the contract **we** have or are trying to enter into with **you** (for example, to provide you with insurance broking services). In this case, **we** may have to cancel a service **you** have with **us**, but **we** will notify **you** if this is the case at the time.

SECTION 3: WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

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

- **you** (for example by filling in forms or by corresponding with **us** by post, phone, email or otherwise. This includes personal data you provide when you:
 - make enquiries about or request our services;
 - subscribe to receive our newsletters or publications;
 - request marketing to be sent to you;
 - give us some feedback);
- **your** family members, employer (including trade or professional associations of which you are a member) or representative;
- other **insurance market participants**;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies;
- Technical Data from analytics providers such as Google;
- forms on our website, and Technical Data and Usage Data about your equipment, browsing actions and patterns from your interaction with our website. We collect this personal data by using cookies and other similar technologies. Please see our Cookies Notice (<https://global.lockton.com/mena/en/cookies-notice>) for further details;
- claims forms;
- third parties who introduce business to us;
- in the event of a claim, third parties including the other party to the claim (**claimant**/defendant), witnesses, experts (including medical experts), loss adjusters, solicitors, and claims handlers.

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

For example, **we** might collect **your personal data** where:

- **you** have taken out an **insurance policy** through **us** (**you** are the **policyholder**), in which case **we** might collect **your personal data** from **you**, credit reference agencies, anti-fraud databases, sanctions list etc.;
- a third party (such as a family member or your employer) has taken out an **insurance policy** through **us** for **your** benefit (**you** are an **insured** or **beneficiary**), in which case **we** might collect **your personal data** from **your** family member, employer etc.;
- **you** are a **claimant** or other person involved in a claim or relevant to a policy. E.g. **you** are making a claim against an **insurance policy** **you** have taken out through **us** or that a third party has taken out through **us** for **your** benefit, or **you** are making a claim against a third party's **insurance policy** that was taken out through **us**, or a third party is making a claim against an **insurance policy** **you** have taken out through **us**, in which case **we** might collect **your personal data** from **you**, other **insurance market participants**, witnesses, experts (including medical experts), loss adjusters, solicitors, and claims handlers etc.

SECTION 4: THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

We set out below the purposes for which **we** might use **your personal data**:

Purposes:	
Relationship Management ►	<ul style="list-style-type: none"> - To provide you with information (for example in respect of products and services) that you request from us, and taking steps at your request prior to entering into a contract
Quotation / Inception ►	<ul style="list-style-type: none"> - Setting you up as a client, including possible fraud, sanctions, credit, and anti-money laundering checks - Evaluating the risks to be covered and matching to appropriate insurer/policy/premium - Payment of premium where the insured/policyholder is an individual
Policy Administration ►	<ul style="list-style-type: none"> - Client care, including communicating with you and sending you updates - Payments to and from individuals
Claims Processing ►	<ul style="list-style-type: none"> - Managing insurance and reinsurance claims - Defending or prosecuting legal claims - Investigation or prosecuting fraud
Renewals ►	<ul style="list-style-type: none"> - Contacting the insured/policyholder to renew the insurance policy - Evaluating the risks to be covered and matching to appropriate policy/premium - Payment of premium where the insured/policyholder is an individual
Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period ►	<ul style="list-style-type: none"> - Complying with our legal and regulatory obligations - General risk modelling - Transferring books of business, company sales and reorganisations

Consultancy Services ►	<ul style="list-style-type: none"> - Setting you up as a client, including possible fraud, sanctions, credit, and anti-money laundering checks - Client care, including communicating with you and sending you updates - Payments to and from individuals - General risk modelling - Analysis as part of the specific consultancy advice - Transferring books of business, company sales and reorganisations - Complying with our legal and regulatory obligations
Website Management ►	<ul style="list-style-type: none"> - To administer and protect our business and this website and for internal operations, including to keep our website safe and secure, data analysis, troubleshooting, testing, system maintenance, support, reporting and hosting of data, research, statistical and survey purposes - To use data analytics to improve our website, products/services, marketing, customer relationships and experiences, including to ensure that content from our website is presented in the most effective manner for you and for your device
Marketing ►	<ul style="list-style-type: none"> - To make suggestions and recommendations to you about products or services that may be of interest to you, to provide industry insight or to invite you to events - To measure and understand the effectiveness of marketing we serve to you and others and to deliver relevant marketing to you

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.

MARKETING

We strive to provide you with choices regarding certain **personal data** uses, particularly around marketing and advertising. We have established the following **personal data** control mechanisms:

- MARKETING COMMUNICATIONS FROM US

We may use **your Individual Details and Policy Information** to form a view on what **we** think **you** may want or need, or what may be of interest to **you**. This is how **we** decide which products, services, events, and industry insight may be relevant for **you**.

You will receive marketing communications from **us** if **you** have requested information from **us** (including for example where you have provided your explicit consent by way of opting-in to receiving our marketing communications in accordance with applicable law) or purchased services from **us**, or (where you are a corporate entity) where we consider the marketing material to be relevant to you and, in each case, **you** have not opted out of receiving that marketing. Such marketing communications may include risk or insurance related information or details of services, or products, or events, which **we** think, may be of interest to **you**.

- THIRD PARTY MARKETING

We will get **your** express opt-in consent before **we** share **your** personal data with any company outside the Lockton group of companies for marketing purposes.

We may share your personal data with other companies in the Lockton group of companies, if allowed and appropriate, for marketing purposes.

- MANAGING YOUR MARKETING PREFERENCE (INCLUDING OPTING OUT)

You can manage your marketing preferences or ask **us** or third parties to stop sending **you** marketing messages at any time by following the opt-out links on any marketing message sent to **you** or by contacting our **Compliance Manager** at any time.

Where **you** opt out of receiving these marketing messages, this will not apply to personal data provided to **us** as a result of a product/service purchase, product/service experience or other transactions, and will not affect communications relating to any such matters on which we are advising you.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Notice (<https://global.lockton.com/mena/en/cookies-notice>) in our website.

CHANGE OF PURPOSE

We will only use **your personal data** for the purposes for which **we** collected it, unless we reasonably consider that **we** need to use it for another reason and that reason is compatible with the original purpose. If **you** wish to get an explanation as to how the **processing** for the new purpose is compatible with the original purpose, please contact our **Compliance Manager**.

If **we** need to use **your personal data** for an unrelated purpose, **we** will notify **you** and **we** will explain the legal basis which allows **us** to do so.

Please note that **we** may **process your personal data** without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

LEGAL GROUNDS FOR PROCESSING

We will only use **your personal data** when the law allows us to. In particular, **we** will rely on the following legal grounds to use **your personal data**:

For processing personal data	
Legal ground	Details
Your explicit consent (optional)	<p>You have given your explicit consent to the processing of those personal data for one or more specified purposes.</p> <p>You are free to withdraw your consent, by contacting our Compliance Manager.</p>
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.
In the public interest	Processing is necessary for the performance of a task carried out in the public interest.
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 below.

For processing special categories of personal data	
Legal ground	Details
Your explicit consent (optional)	<p>You have given your explicit consent to the processing of those personal data for one or more specified purposes.</p> <p>You are free to withdraw your consent, by contacting our Compliance Manager.</p>
Your explicit consent (necessary)	<p>You have given your explicit consent to the processing of those personal data for one or more specified purposes, where we are unable to procure, provide or administer insurance cover without this consent.</p> <p>You are free to withdraw your consent by contacting our Compliance Manager. However, withdrawal of this consent will impact our ability to place or administer insurance or assist with the</p>

	payment of claims. For more detail see Section 5: Consent.
For legal claims	Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
In the substantial public interest	Processing is necessary for reasons of substantial public interest, on the basis of DIFC and UAE law.

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share **your personal data** with the parties set out below for the Purposes set out in the table above, they may be Data Controllers and/or Processors of **your personal data**.

- Internal third parties: other companies in the Lockton Group (which means our subsidiaries and ultimate holding company and its subsidiaries) who provide IT, system, administration, and/or hosting services and undertake leadership reporting;
- External third parties:
 - Service providers who provide IT, system administration and/or hosting services;
 - Professional advisers including lawyers, bankers, auditors, and **insurers** who provide consultancy, banking, legal, insurance and accounting services;
 - Credit reference agencies;
 - Anti-fraud and sanctions database providers;
 - Other **insurance market participants** such as **intermediaries, insurers and reinsurers**;
 - Banks;
 - Claims handlers;
 - Solicitors;
 - Auditors;
 - Loss adjusters;
 - Experts;
 - Third parties involved in claims/investigations/prosecutions;
 - Private investigators;
 - Police;
 - Courts;
 - the UAE Data Office, DIFC, DFSA and other regulators;
 - Third parties to whom we may choose to sell, transfer, or merge parts of **our** business or **our** assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to **our** business, then the new owners may use **your personal data** in the same way as set out in this privacy notice.

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

We have set out below, in a table format, a description of all the ways we plan to use your personal data, including the categories of personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate, and the third parties with whom we need to share your personal data.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data. Please contact our Compliance Manager if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose	Categories of Data	Legal Grounds	Disclosures
RELATIONSHIP MANAGEMENT To provide you with information (for example in respect of products and services) that you request from us, and taking steps at your request prior to entering into a contract	Personal Data: <ul style="list-style-type: none"> – Individual details – Marketing and Communications Data 	Personal Data: <ul style="list-style-type: none"> – Performance of our contract with you – Compliance with a legal obligation – For our legitimate business interests (to correspond with you) 	
QUOTATION/INCEPTION Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks	Personal Data: <ul style="list-style-type: none"> – Individual details – Identification details – Financial information 	Personal Data: <ul style="list-style-type: none"> – Performance of our contract with you – Compliance with a legal obligation – For our legitimate business interests (to ensure that the client is within our acceptable risk profile) – To assist with the prevention of crime and fraud 	<ul style="list-style-type: none"> – Credit reference agencies – Anti-fraud and sanctions databases
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Credit and anti-fraud data 	Special Categories of Personal Data: <ul style="list-style-type: none"> – In the substantial public interest – Consent 	
QUOTATION/INCEPTION	Personal Data:	Personal Data:	<ul style="list-style-type: none"> – Other insurance market participants such as

Evaluating the risks to be covered and matching to appropriate insurer/ policy/premium	<ul style="list-style-type: none"> – Individual details – Identification details – Policy information 	<ul style="list-style-type: none"> – Performance of our contract with you – For our legitimate business interests (to determine the likely risk profile and appropriate insurer and insurance product) 	intermediaries, insurers, and reinsurers
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Risk details – Previous claims – Credit and anti-fraud checks 	Special Categories of Personal Data: <ul style="list-style-type: none"> – Consent 	
QUOTATION/INCEPTION AND POLICY ADMINISTRATION Payments to and from individuals, including collection or refunding of premiums, paying on claims, and processing other payments	Personal Data: <ul style="list-style-type: none"> – Individual details – Financial information 	Personal Data: <ul style="list-style-type: none"> – Performance of our contract with you – For our legitimate business interests (to recover debts due to us, and ensuring our clients are able to meet their financial obligations) 	<ul style="list-style-type: none"> – Other insurance market participants such as intermediaries, insurers, and reinsurers – Banks
POLICY ADMINISTRATION General client care, including communication with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy. Notifying you about changes to our terms or privacy notice	Personal Data: <ul style="list-style-type: none"> – Individual details – Policy information 	Personal Data: <ul style="list-style-type: none"> – Performance of our contract with you – For our legitimate business interests (to correspond with clients, beneficiaries, and claimants in order to facilitate the placing of and claims under insurance policies) – Compliance with a legal obligation – Consent 	<ul style="list-style-type: none"> – Other insurance market participants such as intermediaries, insurers, and reinsurers
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Risk details – Previous claims – Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> – Consent – Substantial public interest 	

<p>CLAIMS PROCESSING</p> <p>Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> – Individual details – Identification details – Financial information – Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> – Performance of our contract with you – For our legitimate business interests (to assist our clients in assessing and making claims) 	<ul style="list-style-type: none"> – Other insurance market participants such as intermediaries, insurers, and reinsurers – Claims handlers – Solicitors – Loss adjustors – Experts – Third parties involved in the claim (such as health care professionals)
<p>CLAIMS PROCESSING</p> <p>Defending or prosecuting legal claims</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> – Individual details – Identification details – Financial information – Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> – Performance of our contract with you – For our legitimate business interests (to assist in assessing and making claims) 	<ul style="list-style-type: none"> – Other insurance market participants such as intermediaries, insurers, and reinsurers – Claims handlers – Solicitors – Loss adjustors – Experts – Third parties involved in the claim (such as health care professionals)
<p>CLAIMS PROCESSING</p> <p>Investigating and prosecuting fraud</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> – Individual details – Identification details – Financial information – Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> – Performance of our contract with you – For our legitimate business interests (to assist with the prevention and detection of fraud) 	<ul style="list-style-type: none"> – Solicitors – Private investigators – Police – Experts – Third parties involved in the investigation or prosecution – Other insurance market participants such as intermediaries, insurers, and reinsurers – Anti-fraud databases
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> – Credit and anti-fraud data – Risk details – Previous claims – Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> – Consent – For legal claims 	
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> – Health data – Criminal records data 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> – Consent – For legal claims 	

	<ul style="list-style-type: none"> – Other sensitive data – Credit and anti-fraud data – Risk details – Previous claims – Current claims 	<ul style="list-style-type: none"> – In the substantial public interest 	
RENEWALS Contacting you in order to renew the insurance policy	Personal Data: <ul style="list-style-type: none"> – Individual details – Policy information 	Personal Data: <ul style="list-style-type: none"> – Performance of our contract with you – For our legitimate business interests (to correspond with clients, beneficiaries, and claimants in order to facilitate the placing of and claims under insurance policies) – Consent 	<ul style="list-style-type: none"> – Other insurance market participants such as intermediaries, insurers, and reinsurers
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Risk details – Previous claims – Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> – Consent 	
THROUGHOUT THE INSURANCE LIFECYCLE Transferring books of business, company sales and reorganisations. To administer and protect our business	Personal Data: <ul style="list-style-type: none"> – Individual details – Identification details – Financial information – Policy information – Marketing and communications data 	Personal Data: <ul style="list-style-type: none"> – For our legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and to structure our business appropriately) – Compliance with a legal obligation 	<ul style="list-style-type: none"> – Group companies – Courts – Purchaser (potential and actual)
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Credit and anti-fraud data – Risk details – Previous claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> – Consent – In the substantial public interest 	

	<ul style="list-style-type: none"> – Current claims 		
THROUGHOUT THE INSURANCE LIFECYCLE General risk modelling and underwriting	Personal Data: <ul style="list-style-type: none"> – Individual details – Identification details – Financial information – Policy information 	Personal Data: <ul style="list-style-type: none"> – For our legitimate business interests (to build risk models that allow placing of risk with appropriate insurers) 	
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Credit and anti-fraud data – Risk details – Previous claims – Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> – Consent 	
THROUGHOUT THE INSURANCE LIFECYCLE Complying with our legal or regulatory obligations	Personal Data: <ul style="list-style-type: none"> – Individual details – Identification details – Financial information – Policy information – Marketing and communications data 	Personal Data: <ul style="list-style-type: none"> – Compliance with a legal obligation 	<ul style="list-style-type: none"> – DP Authority and other regulators – Police – Other insurance market participants such as intermediaries, insurers, and reinsurers (under court order) – Insurance Fraud database – Auditors
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Credit and anti-fraud data – Risk details – Previous claims – Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> – Consent – For legal claims – In the substantial public interest 	
CONSULTANCY SERVICES Setting you up as a client, including possible fraud, sanctions, credit, and anti-money laundering checks	Personal Data: <ul style="list-style-type: none"> – Individual details – Identification details – Financial information 	Personal Data: <ul style="list-style-type: none"> – Performance of our contract with you – Compliance with a legal obligation – For our legitimate business interests (to ensure that the client is within our acceptable risk profile) – To assist with the prevention of crime and fraud 	<ul style="list-style-type: none"> – Credit reference agencies – Anti-fraud and sanctions databases

	Special Categories of Personal Data: <ul style="list-style-type: none"> – Credit and anti-fraud data 	Special Categories of Personal Data: <ul style="list-style-type: none"> – In the substantial public interest – Consent 	
CONSULTANCY SERVICES Client care, including communicating with you and sending you updates	Personal Data: <ul style="list-style-type: none"> – Individual details – Financial Information – Policy information 	Personal Data: <ul style="list-style-type: none"> – Performance of our contract with you – For our legitimate business interests (to correspond with clients in order to provide consultancy services) – Compliance with a legal obligation – Consent 	
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Risk details – Previous claims – Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> – Consent 	
CONSULTANCY SERVICES Payments to and from individuals	Personal Data: <ul style="list-style-type: none"> – Individual details – Financial information 	Personal Data: <ul style="list-style-type: none"> – Performance of our contract with you – For our legitimate business interests (to recover debts due to us, and ensuring our clients are able to meet their financial obligations) 	<ul style="list-style-type: none"> – Other insurance market participants such as intermediaries, insurers, and reinsurers – Banks
CONSULTANCY SERVICES General risk modelling	Personal Data: <ul style="list-style-type: none"> – Individual details – Financial information – Policy information 	Personal Data: <ul style="list-style-type: none"> – For our legitimate business interests (to build risk models that allow placing of risk with appropriate insurers) 	
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Risk details – Previous claims – Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> – Consent 	

CONSULTANCY SERVICES Analysis as part of the specific consultancy advice	Personal Data: <ul style="list-style-type: none"> – Individual details – Financial information – Policy information 	Personal Data: <ul style="list-style-type: none"> – Performance of our contract with you – For our legitimate business interests (to provide the consultancy services) – Compliance with a legal obligation – Consent 	
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Risk details – Previous claims – Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> – Consent 	
CONSULTANCY SERVICES Transferring books of business, company sales and reorganisations	Personal Data: <ul style="list-style-type: none"> – Individual details – Financial information – Policy information – Marketing and communications data 	Personal Data: <ul style="list-style-type: none"> – For our legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and to structure our business appropriately) – Compliance with a legal obligation 	<ul style="list-style-type: none"> – Group companies – Courts – Purchaser (potential and actual)
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Risk details – Previous claims – Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> – Consent – In the substantial public interest 	
CONSULTANCY SERVICES Complying with our legal or regulatory obligations	Personal Data: <ul style="list-style-type: none"> – Individual details – Financial information – Policy information – Marketing and communications data 	Personal Data: <ul style="list-style-type: none"> – Compliance with a legal obligation 	<ul style="list-style-type: none"> – DP Authority and other regulators – Police – Other insurance market participants such as intermediaries, insurers, and reinsurers (under court order) – Auditors
	Special Categories of Personal Data: <ul style="list-style-type: none"> – Risk details – Previous claims – Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> – Consent – For legal claims 	

		– In the substantial public interest	
<p>WEBSITE MANAGEMENT</p> <p>To administer and protect this website and for internal operations, including to keep our website safe and secure, data analysis, troubleshooting, testing, system maintenance, support, reporting and hosting of data, research, statistical and survey purposes</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> – Individual Details – Technical Data – Marketing and Communications Data 	<p>Personal Data:</p> <ul style="list-style-type: none"> – For our legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of business reorganisation or group restructuring exercise) – Compliance with a legal obligation 	<ul style="list-style-type: none"> – Internal third parties – External third-party service providers who provide IT and system administration services – Purchaser – Courts – DFSA, DIFC DP Authority and other regulators – Police – Professional advisers
<p>WEBSITE MANAGEMENT</p> <p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences, including to ensure that content from our website is presented in the most effective manner for you and for your device</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> – Technical Data – Usage Data 	<p>Personal Data:</p> <ul style="list-style-type: none"> – For our legitimate business interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) 	<ul style="list-style-type: none"> – External third-party service providers who provide IT and system administration services
<p>MARKETING</p> <p>To make suggestions and recommendations to you about products, services or events that may be of interest to you and to provide industry insight</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> – Individual details – Policy information – Technical Data – Usage Data – Marketing and Communications Data 	<p>Personal Data:</p> <ul style="list-style-type: none"> – For our legitimate interests (to develop our products/ services and grow our business) – Explicit consent (optional) (where required by law) 	

<p>MARKETING</p> <p>To measure and understand the effectiveness of marketing we serve to you and others and to deliver relevant marketing to you</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> - Individual Details - Marketing and Communications Data - Technical Data - Usage Data 	<p>Personal Data:</p> <ul style="list-style-type: none"> - For our legitimate business interests (to understand how customers use our products and services, to develop them and grow our business, and to inform our marketing strategy) 	
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SECTION 5: CONSENT

In order to arrange and provide insurance cover and deal with insurance claims in certain circumstances **we** and other **insurance market participants** may need to process **your special categories of personal data**, such as medical and criminal convictions records, as set out against the relevant purpose.

Your consent to this processing may be necessary for us and the other insurance market participants to achieve this.

You may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our, and the other insurance market participants', ability to place, administer and provide insurance or pay claims.

SECTION 6: PROFILING AND AUTOMATED 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: DATA SECURITY

Unfortunately, the transmission of data over the internet or any website cannot be guaranteed to be completely secure from intrusion. However, **we** have put in place appropriate physical, electronic and procedural security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

SECTION 8: 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 or in relation to **your insurance**, or where **we** are required to keep **your personal data** due to legal, regulatory, accounting or reporting reasons.

To determine the appropriate retention period for **personal data**, we consider the amount, nature, and sensitivity of the **personal data**, the potential risk of harm from unauthorised disclosure of your **personal data**, the purposes for which we **process** your **personal data** and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your **personal data**: see **Section 10 (Your Rights and Contact Details of the DIFC DP Authority)** below.

In some circumstances we may anonymise **your** personal data (so that it can no longer be associated with **you**) for research or statistical purposes in which case we may use this information indefinitely without further notice to **you**.

SECTION 9: INTERNATIONAL TRANSFERS

We may need to transfer **your** data to **insurance market participants and/or** other companies within the Lockton group or their respective affiliates or sub-contractors which are located outside of the DIFC and the UAE (as applicable) i.e., for example, transfers to other countries in GCC, United States of America and United Kingdom. Those transfers would always be made in compliance with Data Protection Laws, for example:

- certain countries outside the DIFC or UAE (as applicable) have been approved as having a legal framework in place that provides equivalent protection for individuals' rights and freedoms for their **personal data** as provided under Data Protection Laws. This is known as an 'adequacy decision'. Where a country is covered by an adequacy decision of the DP Authority, under data protection laws **we** are able to freely transfer **personal data** to such a country providing **we** comply with the rest of the **Data Protection Laws**;
- where a country is not covered by adequacy decision, **we** must ensure that the transfer is subject to appropriate safeguards, for example standard data protection contractual clauses, individuals' consent or other legal grounds permitted by applicable legal requirements.

If **you** would like further details of how **your personal data** would be protected if transferred outside the DIFC or UAE (as applicable), please contact **our Compliance Manager**.

SECTION 10: YOUR RIGHTS AND CONTACT DETAILS OF THE DATA PROTECTION AUTHORITIES

If you have any questions about this privacy notice or in relation to **our** use of **your personal data**, **you** should first contact our **Compliance Manager**. 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 **we** maintain about **you**;
- update any inaccuracies in the **personal data we** hold;
- delete any **special category of personal 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 that **we** justify on the legitimate interests ground, unless **our** reasons for undertaking that processing outweigh any prejudice to **your** data protection rights;
- object to direct marketing;
- restrict how **we** use **your personal data** whilst a complaint is being investigated; and
- request the transfer of **your personal data** to another party.

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).

If **you** wish to exercise any of the rights set out above, please contact **our Compliance Manager**.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access **your personal data** (or to exercise any of the other rights). However, **we** may charge a reasonable fee if **your** request is clearly unfounded, repetitive, or excessive. Alternatively, **we** may refuse to comply with **your** request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from **you** to help **us** confirm **your** identity and ensure **your** right to access **your personal data** (or to exercise any of **your** other rights). This is a security measure to ensure that **personal data** is not disclosed to any person who has no right to receive it. **We** may also contact **you** to ask **you** for further information in relation to **your** request to speed up **our** response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take **us** longer than a month if **your** request is particularly complex or **you** have made a number of requests. In this case, **we** will notify **you** and keep **you** updated.

YOUR RIGHT TO COMPLAIN TO THE COMMISSIONER

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 10: Your Rights and Contact Details of the DP Authorities**, or if **you** think that **we** have breached the **Data Protection Laws**, then **you** have the right to complain to the **DP Authority** for data protection issues. Please see below for contact details of the applicable **DP Authority**.

For the UAE Data Office:

[TO BE CONFIRMED ONCE THE UAE DATA OFFICE ESTABLISHED]

For the DIFC Commissioner for Data Protection:

Dubai International Financial Centre Authority

Level 14, The Gate Building

Tel: +971 4 362 2222

Email: commissioner@dp.difc.ae

We would, however, appreciate the chance to deal with **your** concerns before **you** approach the **DP Authority** so, please contact **us** in the first instance.

SECTION 11: GLOSSARY OF KEY TERMS

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**.

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

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**, or they may approach an **insurer** directly or via a price comparison website.

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**.

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**.

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.

We, us or **our** refers to Lockton MENA Limited, a private company number CL0970 and its registered office at Suite 201, Gate Village 6, DIFC Dubai, UAE, an insurance intermediary and insurance management company authorised and regulated by Dubai Financial Services Authority (DFSA) under Firm Reference Number F001336.

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

KEY DATA PROTECTION TERMS:

Data Protection Laws means all laws and regulations relating to the Processing of Personal Data, including the DIFC Data Protection Law and UAE Data Protection Law, as the same may be in force from time to time.

DIFC Data Protection Law means DIFC Law No. 5 of 2020 including all regulations, circulars, notices, and other forms of subordinate legislation, in all cases as updated or amended from time to time.

UAE Data Protection Law means Federal Decree Law No. 45/2021 including all regulations, circulars, notices, and other forms of subordinate legislation, in all cases as updated or amended from time to time.

Data Controller is an entity which collects and holds personal data. It decides what personal data it collects about you and how that personal data is used.

DP Authority means the DIFC Commissioner for Data Protection or the UAE Data Office (as applicable).

Personal Data is any data from **you** which can be identified, and which relates to **you**. It may include data about any claims **you** make.

Processing of Personal Data includes collecting, using, storing, disclosing, or erasing your personal data.



Lockton (MENA) Limited

DIFC, PO Box 506794, Dubai, UAE.

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