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# Data Privacy Notice

This privacy notice is provided by Hamilton UK Holdings Limited and its subsidiary companies Hamilton Corporate Member Limited, Hamilton Corporate Member II Limited, Hamilton Corporate Member III Limited, Hamilton Managing Agency Limited, managing agent of Lloyd's syndicates 1947 (trading as GIC Syndicate), 2014 (trading as Acappella), and 6125 (a special purpose syndicate in partnership with Reaseguradora Patria), Hamilton Managing General Agency UK Limited, Hamilton UK Services Limited, and Hamilton Underwriting Limited, managing agent of Lloyd's syndicate 4000. These firms are collectively referred to as Hamilton, we, our and us throughout this notice. Details on each legal entity is contained within the Companies section below.

# Your Personal Information

Hamilton is committed to respecting your privacy and that of the information you provide to us in our business with you. This data privacy notice seeks to provide you with information about how and why we will use your personal data.

We keep our data privacy notice under regular review. This notice is version 1.2. Previous notices are available from our Data Protection Manager, whose contact details are contained within the Contact us section below.

When we ask you for your personal data, we will explain why we need it. Reasons we may require your personal data include:

- To perform the contract we have entered into with you.
- To meet our legal obligations.
- For our legitimate interests, where these do not compromise your interests, rights and freedoms.

If we are not being sufficiently clear in our explanation, we invite you to tell us. Where we are required to seek your specific consent to process your personal data we will explain what we are asking you to agree and why. In this situation, you have the choice as to whether to give your consent or not. If you do give consent, you may withdraw it at a later date. Where we require your consent but you choose to withhold or withdraw it, we may not be able to perform the contract we have entered into with you.

When you provide us with your personal data, we will use it only for the purpose you have provided it. We respect your privacy and will protect your data from unintended use in the same way that we protect our own confidential information. We may disclose your personal data in the following circumstances:

- Where we are required to do so by law or regulation.
- To other companies within Hamilton Insurance Group to facilitate the effective management of the group of companies.



We will keep your personal data only for so long as is necessary for the purpose it was provided and otherwise in accordance with legal and regulatory requirements. If you would like further information regarding the periods for which your personal information will be stored, please contact us using the details contained within the Contact us section below.

### **Policyholders, Insureds and Claimants**

Insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, insurers and reinsurers. The London Insurance Market Core Uses Information Notice (see **londonmarketgroup.Co.Uk/gdpr**) sets out those core necessary personal data uses and disclosures. Our core uses and disclosures are consistent with the London Market Core Uses Information Notice. We recommend you review this notice.

### **Business Partners**

We have a legitimate interest in data required to facilitate the business arrangement between us and for normal exchanges in the course of business. We may also lawfully process your information to perform the contract agreed between us.

Unless you have signed up to receive news updates, we will not send this information to you. You may withdraw your consent to receiving news by using the options in the communication sent to you or by contacting us using the details contained within the Contact us section below.

### **Prospective Employees**

We have a legitimate interest in data required to make contact with you. We may lawfully process data required for pre-employment activities and have a legal obligation to undertake certain checks.

### Website Users

When you visit our website (hamiltongroup.com), your internet browser may provide us with some of your personal information, including:

The time and date you access our website.

- Information about your software and your internet protocol address (ip address).
- Your location.
- The pages you visited.

We use this information to improve the delivery of relevant information to you.

We may also leave a cookie on your internet browser. Hamilton's cookies policy can be found at hamiltongroup.com/cookies-policy.

# Data Sharing

We may share your personal data with other companies within the Hamilton Insurance Group, some of whom are based outside of the European Union.

To fulfil the need for which you have provided us with your personal data, we may share your data with companies based outside of the European Union. Not all countries of the world have data protection standards that are the equivalent of those in the United Kingdom. Where we share your personal data with companies that are based outside of the European Union, we will make sure that your information is protected to an equivalent standard by, for example:

 Contracting with the receiving company with clauses approved by the European Union authorities as providing adequate protection or through the use of Binding Corporate Rules.



- Sharing the data with companies in countries considered by the European Commission as having suitably high standards of data protection legislation.
  A list of these countries can be found on the European Union website at ec.europa.eu/info/law/
  - law-topic/data-protection.
- Sharing the data with companies that have committed to adequate levels of protection through participation in schemes such as the Privacy Shield agreed between the data protection authorities of the European Union and United States.

### Website Users

The website **hamiltongroup.com** is hosted outside of the European Union by a third party.

### Your Rights

In relation to your personal data, you may have the right to require us to:

- Give further details of the use we make of your personal data.
- Give you a copy of your personal data that we have, including in a structured and commonly used format.
- Correct any incorrect personal data that we have.
- Delete any personal data that we have no lawful basis to hold.

Where our processing is based on consent, you may withdraw your consent at any time. You may also object to our processing of your personal data.

If you would like to exercise your rights in relation to your personal data, you should contact us using the details contained within the Contact us section below. We will not charge you for exercising your rights, though if your request for access to your personal information is clearly unfounded or excessive we are permitted to charge a reasonable fee or refuse to comply with the request. Where we require your consent to process your data but you choose to withhold or withdraw it, we may not be able to perform the contract we have entered into with you.

## Contact Us

If you have any questions in relation to this privacy notice or otherwise how Hamilton processes personal data, including requests to exercise a data subject's legal rights, please contact the Data Protection Manager using the details below.

### +44 (0) 203 595 1111

St. Helen's, 1 Undershaft London, EC3P 3DQ, United Kingdom

HULCompliance@hamiltongroup.com

# Complaint

Should you believe we have failed to process your personal information appropriately, you are invited to discuss the matter with Hamilton. Our contact details are at the Contact us section above. You may at any time lodge a complaint with the Information Commissioner's Office (ICO), using the details below.

> Wycliffe House, Water Lane, Wilmslow Cheshire, SK9 5AF, United Kingdom

0303 123 1113 or +44 (0) 162 554 5700 ico.org.uk 3



# Companies

This data privacy notice is made by the following companies.

Company name	Registered company number	Registered company address
Hamilton Corporate Member Limited	05996460	St. Helens, 1 Undershaft London, EC3P 3DQ United Kingdom
Hamilton Corporate Member II Limited	12185704	
Hamilton Corporate Member III Limited	12241329	
Hamilton UK Holdings Limited	09241836	
Hamilton UK Services Limited	11381012	
Hamilton Underwriting Limited	06694157	
Hamilton Managing Agency Limited	05832065	Level 3, 8 Fenchurch Place London, EC3P 4AJ United Kingdom
Hamilton Managing General Agency UK Limited	11969375	