

Privacy Notice



Fergus Reinsurance Limited ("**Fergus Re**") uses information about you that can identify you, and we are committed to using your personal information in a lawful and fair manner, and in compliance with the Bermuda's Personal Information Protection Act 2016 ("PIPA"). This Privacy Notice is designed to comply with our privacy notice requirements pursuant to PIPA.

What personal information we collect from you

We collect, use, and disclose personal information and sensitive personal information (as defined in PIPA) about you only for the purposes for which it was collected. We do not sell your personal information or use it for marketing purposes. Depending on your products, services you use, and your interactions with us, the information we need may include:

- Personal identification information, such as full name, date of birth, passport (and all related information therein), government issued identification, driving license or other photographic identity details;
- IP address, information related to any potential politically exposed person status or other information about you that is in the public domain;
- Company or organization details, including business or personal contact information including residence, nationality, postal address, email address and any telephone number(s);
- Professional and employment information (which may include your level of education, professional qualifications, employer's name and details of directorships or other offices you may hold);
- Demographic information such as postcode, preferences and interests, association or professional affiliations or memberships;
- Financial information, including sources of wealth, existing or previous wills or estate information, your assets, existing banking details and credit history;
- Fraud and sanctions related data – including information as a result of our investigations such as checks from publicly available sources;
- Detailed information about your claim – including policyholder information, witnesses, related parties to the claim, experts appointed and third-party service providers; and
- Information we collect automatically through cookies and similar tracking technologies through our website, mobile applications or other online services.

We may also collect, store and use the following "special categories" of more sensitive personal information including:

- Detailed information about your claim– including medical reports, disability information and past criminal convictions;
- Racial or ethnic origin;
- Political opinions, religious or philosophical beliefs;
- Trade union membership;
- Data concerning physical or mental health or disabilities;
- Genetic data or biometric data for the purpose of uniquely identifying a natural person;
- Data relating to any criminal allegations, criminal records, regulatory records, court cases and convictions;

- Marital or family status; or
- Data concerning a natural person's sex life or sexual orientation.

1. How to contact us about our handling of personal information

For any inquiries or concerns regarding our handling and use of your personal information, please contact our Privacy Officer.

Julie Stanton
Privacy Officer

Address: Continental Building, 25 Church Street, Hamilton HM12, Bermuda

Email: julie.stanton@fergus.bm

2. The purposes for which personal information is or might be used

Your personal information may be used by us for the following purposes:

- To respond to your enquiries
- Providing you with our products or services and related correspondence;
- Processing payments or refunds;
- Promoting our products or services (through the use of photographs, videos, brochures or other publications) to you;
- To maintain our list of contacts;
- Coordinating the provision of our products or services with our suppliers or service providers;
- As may be required for any legal or regulatory purposes associated with our due diligence Anti-Money Laundering and Anti-Terrorism Financing, or other "Know Your Customer" requirements or governance practices;
- As may be required as part of the services we procure for domestic or foreign data processing, to outsource our information technology infrastructure, or where-ever the use of your personal information is required for the purpose of performing such third-party services for the benefit of our company;
- To evaluate and recruit personnel;
- For undertaking data analytics, statistical analysis or related customer relationship assessment and evaluation; or
- As we believe reasonably necessary or appropriate to: comply with our legal and/or regulatory obligations; to comply with our professional and ethical duties; respond to legal process or requests for information issued by courts, regulators, government authorities or other third parties; or, protect your, our, or others' rights, including legal rights.

3. The identity and types of individuals or organisations to whom personal information might be disclosed

Fergus Re will, or may, disclose your personal information to the following individuals and organisations:

- Bermuda Monetary Authority
- Artex Insurance Management Limited
- Gnosis Limited
- Virtual Chief Information Security Officer

- Atlassian software and cloud solutions for document management
- Checchi Capital
- Pinnacle Actuarial Resources, Inc.
- Forvis Mazars
- EY Bermuda Ltd.
- Appleby
- Compass Administration Services Ltd.
- Unwind Finance Inc.

The types of individuals or organizations that we may provide your personal information are as follows:

- Other insurance and reinsurance companies
- Fergus Re employees
- Brokers, agents, appointed representatives and authorized business associates or partners
- governments, regulatory authorities, public bodies, taxation authorities
- Law enforcement, courts or tribunals as required by the laws of any jurisdiction that may apply to us and including, for the purposes of complying with our legal or regulatory obligations
- Credit reference agencies
- Third Party Administrators
- Suppliers, service providers, advisors, consultants
- Affiliates, parent, subsidiaries
- Professional advisors, such as legal, accounting, financial/ investment or business advisors
- marketing or advertising advisers, website hosts, agencies
- Third party outsourcing, cloud, SaaS, DaaS or other IT/data processing service providers

4. Means we use to allow you to control our use of your personal information in accordance with PIPA

To obtain access to, or make a request for a correction to, your personal information, please submit a written request to the Privacy Officer, which must include sufficient information to enable us, with reasonable effort, to identify the personal information that is relevant to your request. Your request must also include all necessary contact information for us to respond to your request.

You will be contacted by one of our privacy administrators promptly to confirm our receipt of your request, but no more than **two business days** after we have received your request.

Fergus Re reserves the right to update this privacy notice at any time and as may be prudent or necessary to reflect changes in our privacy practices or legal requirements.

Please note the following information associated with any request we receive from you:

- We require your accurate and complete name, contact information.
- We will confirm our receipt of your enquiry or instructions within 48 hours after we have received same.

- We will take a reasonable amount of time to process your enquiry or instructions and initially respond to your request, but usually no more than 45 days (depending upon the nature and complexity of your request).

Fergus Re reserves all of its rights and protections afforded to it under PIPA. Fergus Re reserves the right to update and revise this privacy notice at any time, as we may determine to be prudent or necessary to reflect changes in our privacy practices or legal requirements.
