

Privacy Policy

Ensuring the protection
of personal information.

MSIG at Lloyd's
Excellence in all we do

Privacy Policy

This Privacy Policy sets out how Mitsui Sumitomo Insurance (London Management) Limited and its subsidiaries will handle any personal information (which includes personal data under the Data Protection Act 1998) that we collect from you, or that you provide to us.

Where you submit personal information to us, you confirm that you have all necessary permissions and consents to do so and that you have read, and agree to, the terms of our Privacy Policy.

In this Privacy Policy:

- **'we' / 'us' / 'our'** refers to Mitsui Sumitomo Insurance (London Management) Limited and its subsidiaries; and
- **'you' / 'your'** refers to you, as the person providing personal information to us.

Personal information collection and use

We are committed to ensuring the protection of all personal information that we hold and to fulfilling our responsibilities and obligations under data protection legislation, in particular the Data Protection Act 1998. By submitting personal information to us, you agree that we may process such information in accordance with this Privacy Policy.

Information we may collect

We may collect and process the following information:

- information provided to us directly (e.g. to our claims handlers), whether by letter, email or otherwise;
- information from a third party (e.g. a broker, lawyer or medical expert) authorised to provide it to us;
- information received from a third party (e.g. a lawyer or external claims handler appointed by us in relation to a claim or a coverholder with delegated authority to underwrite on our behalf); and
- information provided in correspondence with us, or a record of it.

Where we store your personal information

The personal information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us, one of our associated companies or a third party engaged by us. By submitting personal information to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that such personal information is treated securely at all times and in accordance with this Privacy Policy.

Unfortunately, the transmission of information via email and internet is not completely secure. Although we will do our best to protect the personal information that you submit, we cannot guarantee the security of data transmitted via email or the internet; and any transmission is at your own risk. Once we have received information from you, we will use strict procedures and security features to prevent unauthorised access.

Security is very important to us. Appropriate security measures are in place to protect the confidentiality of the information that we hold. We limit access to personal information to those who we reasonably believe need to use that information in order to carry out their jobs. We have physical, electronic, and procedural safeguards that comply with our legal obligations to protect personal information.



Use of personal information

We use the personal information in the following ways:

- **Underwriting:** for the purposes of underwriting by us, our associated companies, co-insurers or coverholders.
- **Claims handling:** for the purposes of claims handling by us and by our associated companies, our co-insurers, the insured and its broker and other third parties advising us or otherwise relevant to the handling of a claim.
- **Insurance administration:**
 - by us, our reinsurer(s) and reinsurance broker(s) for any reinsurance claim made by us, for renewal purposes, for our management reporting and for internal and external audit;
 - to satisfy information requests;
 - to provide notifications about changes to our services; and
 - with appropriate consents, to provide marketing services.
- **Statistical analysis:** for the purposes of statistical analysis and review of our business and business processes, quality assurance and reporting.
- **Fraud and crime prevention:** in connection with compliance with law, regulation and any rules or codes.

Where you provide us with personal information that may be regarded as “sensitive personal data” under the Data Protection Act 1998 (e.g. including health records, reports or notes, concerning your physical or mental health) you agree that we (and third parties acting on our behalf) may use such information for the above purposes of: (i) underwriting; (ii) claims handling; (iii) insurance administration; (iv) statistical analysis; and (v) fraud and crime prevention.

“Sensitive personal data” includes information about a person’s racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings.

Information that you provide about other parties

Where you submit personal information to us (including information containing personal data), we rely on you to have first obtained appropriate consents for the transfer, and processing of, such information, to or by us and third parties acting on our behalf, in accordance with this Privacy Policy.

By submitting such information to us you confirm that you have all necessary permissions and consents to do so. **You must not submit such information to us unless you have the appropriate permissions and consents.**

Disclosure of your personal information

For the purposes set out above, we may share the information that you submit with the following third parties:

- any member of the MS&AD Group;
- our co-insurers and relevant brokers;
- third parties instructed and/or advising us for the purposes of claims handling;
- our reinsurer(s) and reinsurance brokers; and
- law enforcement or regulatory bodies in connection with compliance with any laws, regulation, rules or codes.

We may also share your information in the following circumstances:

- if we, or substantially all of our assets, are acquired by a third party, in which case personal information held by us about our customers may be one of the transferred assets; and
- to protect the rights, property, or safety of us, our customers, or others (e.g. exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

Access to information

Data subjects have the right to access information held about them. This right of access can be exercised in accordance with UK data protection laws. Any access request may be subject to a small administrative fee to meet our costs in providing details of the relevant information that we hold.

Changes to our Privacy Policy

Please be aware that we may update and modify this Privacy Policy from time to time. You will be alerted about any material changes we may make to our Privacy Policy.

Contact

Mitsui Sumitomo Insurance (London Management) Limited is registered in England (company number 3904868), with its registered office at 2nd Floor, 25 Fenchurch Avenue, London, EC3M 5AD, UK.

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Chief Information Office at the above address.



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The shortened names of MSIG at Lloyd's and MSIG UK and Ireland represents Mitsui Sumitomo Insurance Underwriting at Lloyd's Ltd (MSIUL), managing agency of Syndicate 3210. Mitsui Sumitomo Insurance Underwriting at Lloyd's Ltd – Registered in England No 5965101* Mitsui Sumitomo Insurance (London Management) Ltd – Registered in England No 3904868 Mitsui Sumitomo Insurance (London) Ltd – Registered in England no 1228765* MSI Insurance Management (Ireland) Ltd (MSIIMIL) – Registered in Ireland No 502727** MSI Corporate Capital Ltd – Registered in England No 3905004.

* Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

** Regulated by the Central Bank of Ireland.

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