

## Roanoke International Brokers Limited - Privacy Notice

This privacy notice is designed to help you, as a customer of Roanoke International Brokers Limited (RIBL), to understand how we process your personal data.

You are a customer of Roanoke International Brokers Limited and we are a broker that may place your insurance or reinsurance policy with a number of insurance or reinsurance companies.

The insurance lifecycle may involve the sharing of your personal data with other insurance market participants, some of which, you may not have direct contact with. You can find out more information about these companies by contacting the company that you purchased your policy from.

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| <b>The Data Controller for Roanoke International Brokers Limited is:</b>                                                                                                                                                                                                    |
| Roanoke International Brokers Limited<br>1 Fen Court<br>London<br>EC3M 5BN<br><br>Tel: +44 (0) 20 7886 3800<br>Email: <a href="mailto:info@roanokebrokers.com">info@roanokebrokers.com</a><br><a href="https://www.roanokebrokers.com/">https://www.roanokebrokers.com/</a> |

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| <b>The Data Protection Officer for Roanoke International Brokers Limited is:</b>                                                                                                                                                                                                                                                 |
| The Data Protection Officer<br>Roanoke International Brokers Limited<br>1 Fen Court<br>London<br>EC3M 5BN<br><br>Tel: +44 (0) 20 7886 3800<br>Email: <a href="mailto:roanokedataprotection@munichre.com">roanokedataprotection@munichre.com</a><br><a href="https://www.roanokebrokers.com/">https://www.roanokebrokers.com/</a> |

Please contact the Data Protection Officer if you have questions concerning this Privacy Notice or your Data Subject Rights. These include:

- Data Subject Access Request: To request access to your personal data and information around its processing.
- Data Portability: The transfer of your personal data to another Data Controller.
- Erasure: To have your personal data removed or deleted.
- Rectification: To have your personal data corrected if it is inaccurate.
- Restrict Processing: To restrict processing where your personal data is inaccurate or the processing is unlawful.
- To object to processing based on legitimate interest.
- To object to direct marketing (NOTE: we do not do direct marketing).

If you are unhappy with any response or have a complaint. You can raise this with:

The Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: +44 (0) 303 123 1113

## Who your data is shared with

The following are data controllers that we share your personal data with:

- Insurers;
- Reinsurers - including Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München;
- Government Agencies; and
- Legal advisers.

The following are data processors that we disclose your personal data to:

- Third Parties providing services for Banking, Claims Handling, Insurance Administration and IT Services.

Please contact the Data Protection Officer ([roanokedataprotection@munichre.com](mailto:roanokedataprotection@munichre.com)) if you require further information on who your data is shared with.

## What information do we collect about you

### Personal Data

| Categories of data     | Type of information processed                                                                                                          | Where the data may come from                              | Who we may disclose the data to                                                                                                       | Potential purpose of processing                                                                                                                                                         | Lawful basis of processing            |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Individual Information | Name, address, marital status, date and place of birth, nationality.                                                                   | Insurance brokers or other insurance market participants. | Other insurance market participants.<br><br>Group companies providing administration.<br><br>Reinsurers.<br><br>Anti-fraud databases. | Setting you up as a client including arranging insurance cover (issuing quotations, renewals, policy administration, claims administration).                                            | Performance of our contract with you. |
| Policy Information     | Information about the quotes and insurance policies that you have applied for or taken out.                                            | Insurance brokers or other insurance market participants. | Other insurance market participants.<br><br>Group companies providing administration.<br><br>Reinsurers.<br><br>Anti-fraud databases. | Setting you up as a client including arranging insurance cover (issuing quotations, renewals, policy administration, claims administration).                                            | Performance of our contract with you. |
| Financial Information  | Premiums and claims paid on your policies.<br><br>Bank account or payment card details.<br><br>Income and other financial information. | Insurance brokers or other insurance market participants. | Other insurance market participants.<br><br>Group companies providing administration.<br><br>Reinsurers.<br><br>Anti-fraud databases. | Setting you up as a client including arranging insurance cover (issuing quotations, renewals, policy administration, claims administration).<br><br>Collecting any appropriate premium. | Performance of our contract with you. |

| Categories of data                   | Type of information processed                                                                                              | Where the data may come from                                                                                                                                                        | Who we may disclose the data to                                                                                                       | Potential purpose of processing                                                                 | Lawful basis of processing            |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------|
| Statutory and anti-fraud information | Sanctions and information from anti-fraud databases concerning you.                                                        | Insurance brokers or other insurance market participants.<br><br>Anti-fraud databases, sanctions lists, court judgements and other government agencies.                             | Other insurance market participants.<br><br>Group companies providing administration.<br><br>Reinsurers.<br><br>Anti-fraud databases. | Setting you up as a client including fraud, sanctions, credit and anti-money laundering checks. | Performance of our contract with you. |
|                                      |                                                                                                                            |                                                                                                                                                                                     |                                                                                                                                       |                                                                                                 | Compliance with a legal obligation.   |
| Claim Information                    | Name, address, marital status, date and place of birth, nationality.<br><br>Information about previous and current claims. | Insurance brokers or other insurance market participants.<br><br>You and your family.<br><br>Anti-fraud databases, sanctions lists, court judgements and other government agencies. | Other insurance market participants.<br><br>Group companies providing administration.<br><br>Reinsurers.<br><br>Anti-fraud databases. | Managing insurance and reinsurance claims.                                                      | Performance of our contract with you. |
|                                      |                                                                                                                            |                                                                                                                                                                                     |                                                                                                                                       | Defending or prosecuting legal claims.                                                          | Legal defence of claims.              |

## Special Categories of Personal Data

| Categories of data                   | Type of information processed                                                                                   | Source of the data                                                                                                                                                                | Who we disclose the data to                                                                                                                                                                     | Purpose of processing                      | Lawful basis of processing                         |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|----------------------------------------------------|
| Claim Information                    | Information about previous and current claims.<br>Health information, medical reports.<br>Surveillance reports. | Insurance brokers or other insurance market participants.<br>Anti-fraud databases, claimants, defendants, witnesses, experts inc. medical experts, loss adjustors and solicitors. | Other insurance market participants.<br>Group companies providing administration.<br>Reinsurers.<br>Anti-fraud databases.<br>Medical doctors and specialists.<br>Loss adjustors and solicitors. | Managing insurance and reinsurance claims. | Processing is necessary for an insurance purposes. |
|                                      |                                                                                                                 |                                                                                                                                                                                   |                                                                                                                                                                                                 | Defending or prosecuting legal claims.     | Legal defence of claims.                           |
|                                      |                                                                                                                 |                                                                                                                                                                                   |                                                                                                                                                                                                 | Investigating or prosecuting fraud.        | Compliance with a legal obligation.                |
| Statutory and anti-fraud information | Information about previous and current claims.<br>Criminal records and convictions.<br>Surveillance reports.    | Insurance brokers or other insurance market participants.<br>Anti-fraud databases, sanctions lists, court judgements and other government agencies.                               | Group companies.<br>Other intermediaries or market participants.<br>Anti-fraud databases.<br>Loss adjustors and solicitors.                                                                     | Defending or prosecuting legal claims.     | Legal defence of claims.                           |
|                                      |                                                                                                                 |                                                                                                                                                                                   |                                                                                                                                                                                                 | Investigating or prosecuting fraud.        | Compliance with a legal obligation.                |

## Protection of your information

Your privacy is important to us and we follow strict security and organisational procedures in the processing, storage, destruction and disclosure of your information. This is to prevent unauthorised access or loss of your information.

## **Use of your Consent to process Special Categories of Personal Data**

In order to provide insurance, in certain circumstances we may need to process special categories of personal data, such as medical records or criminal convictions.

We follow the lawful basis that your insurer has used in processing and disclosing your special categories of personal data to us. This may be necessary for an insurance purpose or consent. If consent is used, you will not have given your consent directly to us but to the insurer that you purchased your policy from. You may withdraw your consent for us to process your special categories of personal data at any time by contacting the Data Protection Officer (details as above). However, if you withdraw your consent this will impact on our ability to provide or continue to provide insurance for your insurance policy or pay claims.

## **Call Monitoring and Recording**

For quality control purposes and to audit the evaluation process for the underwriting and pricing of the risks to be insured, we may review copies of telephone recording made with the intermediary that you purchased your policy from.

## Data Retention

Your personal data will only be kept for as long as it is necessary for the purpose it was collected for.

| Category of data                                                                                                                                    | How long we retain your data                                                                                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Each new risk that is underwritten                                                                                                                  | 6 years for short term business<br>40 years for long term business                                          |
| Any material aggregation of exposure to risk from a single source or of the same kind or to the same potential catastrophe or event                 | 6 years                                                                                                     |
| Each notified claim including the amounts notified and paid, precautionary notices and any re-opened claims                                         | 6 years from date of closure of claim. Unless specific jurisdictional requirements dictate a longer period. |
| Claims correspondence                                                                                                                               | At least 3 years after claims settlement                                                                    |
| Policy and contractual documents and any relevant representations made to policyholders                                                             | 6 years for short term business<br>40 years for long term business                                          |
| Other events or circumstances relevant to determining the risks and commitments that arise out of contracts of insurance or contracts for insurance | 6 years for short term business<br>40 years for long term business                                          |

Where the retention period is set by reference to the term of the business, the period commences when there is a reasonable expectation that no further claims would be notified under the relevant policy.



## **Transfer of Data**

We may transfer your personal data outside the UK or EEA where there is not an adequate level of data protection. This will only happen when it is necessary for the insurance contract that you are either requesting or have taken out.

We may transfer your personal data within our Group or to Service Providers outside the UK or EEA. However, we ensure that there is an adequate level of data protection in place and adhered to by these parties.

You can find out the details about any other party we have shared your personal data with by contacting the Data Protection Officer at the address provided at the top of this privacy notice.

## **Changes to this Roanoke International Brokers Limited - Privacy Notice**

If we make changes to this privacy notice that affects how we process your information, we will revise the notice and publish it on our website.