

NOTICE OF PRIVACY PRACTICES

GBG Insurance Limited

Effective Date: May 2018

THIS NOTICE DESCRIBES HOW PERSONAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

The confidentiality of your personal information is of paramount concern to us¹. We maintain records of the services we cover (claims), and we also maintain information about you that we have used for enrolment processing. We use these records to administer your policy benefits and coverage; we may also use these records to ensure appropriate quality of services provided to you and to enhance the overall quality of our services, and to meet our legal obligations. We consider this information, and the records we maintain, to be protected personal information. We are required by law to maintain the privacy of personal information and to provide our insureds with notice of our legal duties and privacy practices with respect to personal information. This notice describes how we may use and disclose your personal information. It also describes your rights and our legal obligations with respect to your personal information.

¹References to “we,” “us,” or “our” in this document refer to the insurance company which issued your coverage, GBG Insurance Limited, or any of its subsidiaries or affiliates (collectively, the GBG Group). A list of these companies can be found on our full privacy policy that is available at: <https://www.gbg.com/#/AboutGBG/PrivacyPolicy>. Alternatively, a hard copy is available on request.

How We May Use or Disclose Your Personal Information

We collect and processes your personal information as necessary for performance under your insurance policy or complying with our legal obligations, or otherwise in our legitimate interests in managing our business and providing our products and services. These activities may include:

1. Use of sensitive information about the health or vulnerability of you, or others involved in your assistance guarantees, in order to provide the services described in your insurance policy;
2. Disclosure of personal information about you and your insurance cover to companies within the GBG group of companies, to our service providers and agents in order to administer and service your insurance cover, for fraud prevention, to collect payments, and otherwise as required or permitted by applicable law;
3. Monitoring and/or recording of your telephone calls in relation to coverage for the purposes of record-keeping, training and quality control;
4. Technical studies to analyze claims and premiums, adapt pricing, support subscription processes and consolidate financial reporting (including regulatory); detailed analyses on claims/calls to better monitor providers and operations; analyses of customer satisfaction and construction of customer segments to better adapt products to market needs;
5. Obtaining and storing any relevant and appropriate supporting evidence for your claim, for the purpose of providing services under your insurance policy and validating your claims; and
6. Sending feedback requests or surveys relating to our services, and other customer care communications.

These activities are carried out within the UK and European Economic Area (EEA), and outside the EEA. The data protection laws and/or the agreements we have entered into with the receiving parties in relation to the processing of data outside the EEA provide a similar level of protection to the laws and/or agreements we have entered into within the EEA.

You are entitled, on request, to a copy of the personal information we hold about you, and you have other rights in relation to how we use your data (as set out in our website privacy policy). Please let us know if you think any information we hold about you is inaccurate, so that we may correct it.

If you have any questions about this Notice of Privacy Practices or our use of your personal information you may contact the Data Protection Officer. Contact details are below:

<p><u>For GBG Insurance Limited</u> The Data Protection Officer:</p> <p>Level 5, Mill Court, La Charroterie St Peter Port, Guernsey, GY1 1EJ</p> <p>Email address: dataprotectioninquiries@gbg.com</p>	<p><u>For Global Benefits Europe B.V.</u> The Data Protection Officer:</p> <p>Global Benefits Europe B.V. Penningkruid 20, 3984 BK Odijk Netherlands</p> <p>Email address: dataprotectioninquiries@gbg.com</p>
<p><u>For Global Benefits Group, Inc.</u> The Data Protection Officer:</p> <p>Global Benefits Group, Inc 27422 Portola Parkway, Suite 110 Foothill Ranch, CA 92610 USA</p> <p>Email address: dataprotectioninquiries@gbg.com</p>	<p><u>For Global Benefits Group Gesellschaft m.b.H.</u> The Data Protection Officer:</p> <p>Global Benefits Group Gesellschaft m.b.H. Fillgradergasse 7/8, 1060, Vienna, Austria</p> <p>Email address: dataprotectioninquiries@gbg.com</p>
<p><u>For Global Benefits Group (UK) Limited</u> The Data Protection Officer:</p> <p>Global Benefits Group (UK) Limited 32 Threadneedle Street, Suite 308, London EC2R 8AY, United Kingdom</p> <p>Email address: dataprotectioninquiries@gbg.com</p>	<p><u>All other GBG Group companies</u> To contact the Data Protection Officer for any of the other companies in the GBG Group, please email dataprotectioninquiries@gbg.com</p>