

Privacy Notice

1. Who we are and our approach to your privacy

In this Privacy Notice, 'we', 'us' and 'our' refers to one or more of the subsidiary companies of Sanctuary HoldCo Limited. This includes Sanctuary Insurance Brokers Limited and CRS Yachts Limited and trading names CRS Yachts, Sanctuary Corporate Risks, Sanctum, Sanctum Health, Sanctum Superyacht Insurance and Sarnia Yachts Insurance Services London. The privacy and security of your personal information is very important to us so we want to assure you that your information will be properly managed and protected when it's in our hands. Please read this notice carefully as it explains how we collect and use your personal information.

You can ask for more information about our use of your personal information or complain about its use, by contacting our Data Champion at: Sanctuary Insurance Brokers Limited, Marlow House, 1a Lloyd's Avenue, London EC3N 3AA or by emailing data.champion@sanctuaryins.com

2. What information do we collect and where do we get it from?

So we can provide our services to you and to manage these services, we'll ask you to share your personal information with us. The circumstances in which we use your information, the reasons why we ask for it and details of how we'll use it are explained in section three of this notice. The information we collect about you varies, depending on your particular circumstances and requirements and may include, for example:

- General information about you, such as your name, address, contact details and date of birth
- Information about what and/or who you want to insure, such as your home, travel details and companions
- Your claims history
- Financial details, such as your bank account details
- Sensitive personal information, such as your health and criminal convictions

We may collect personal information from the following sources:

- You or someone connected to you as part of a quotation or claim
- Publically available sources of information, such as social media and networking sites
- Third party databases made available to the insurance industry

If you've given us information about someone else, you would have confirmed that you have the consent of these individuals to share their personal information with us. You should share this privacy notice with all individuals whose personal information you've shared with us, as it may also apply to them.

3. Why will we collect this information and how will we use it?

We may collect and use your personal information in the following circumstances or for the following reasons:

a) To provide you services relating to an insurance quotation and/or insurance policy such as:

- assessing your insurance application and arranging your insurance policy
- managing your insurance policy including claims handling and issuing policy documentation to you
- providing you with the services described in your policy documents

The collection and use of information such as your name, address, date of birth, claims history, what/who you would like to insure, medical conditions for travel insurance and conviction details where necessary to provide you with a quotation and/or policy. Without this information, we'll be unable to assess your application and/or provide claims services.

b) Where we have a justifiable reason, such as:

- keeping records about you and our correspondence with you as well as your current and past insurance policies and history of insurance claims. This is so that we can appropriately and effectively manage our relationship with you as well as satisfy any legal and regulatory obligations we may have to keep such records.
- preventing and detecting fraud, financial crime and anti-money laundering. We may use your personal information to prevent fraud and in doing so may:
 - i. collect personal information about you from databases as described in this notice and from publically available sources, such as social media and networking sites
 - ii. share your personal information with fraud prevention agencies. Your personal information will be checked with and recorded by a fraud prevention agency. If false or inaccurate information is provided and fraud is identified, details will be passed to the fraud prevention agency. This information will be accessed and used by us, law enforcement agencies and other organisations to prevent fraud and money laundering, for example: checking details on proposals and claims for all types of insurance; and checking details of job applicants and employees. Other organisations may search the databases held by these fraud prevention agencies when you make an application to them for financial products. If such companies suspect fraud, we will share your personal information with them. The information we share may be used by those companies when making decisions about you. We and other organisations may access and use, from other countries, the information recorded by fraud prevention agencies.

- iii. share your personal information with operators or registers available to the insurance industry to check information you provide. These include the Claims and Underwriting Exchange Register and Theft Register.
 - iv. use any personal information obtained about you, or anyone you have provided us information about, to carry out the above profiling activity as part of our investigations into fraudulent behaviour. Should fraud be identified as a result of such profiling activity, this could result in the rejection of an application for insurance, a claim and/or voidance of your policy.
- carrying out processes, such as statistical and trend research and analysis, which may include computerised processes which profile you. This is to better understand, predict and forecast our customer's or prospective customer's preferences and to improve the products and services we offer.
 - using information collected from databases we use together with the personal information you give us, to help us to improve and develop our internal databases and systems, such as those used for assessing the risks we insure and communicating with you, in order to improve the products and services we offer. For more information about how we communicate our products and services, please refer to section 4 of this notice.

We may anonymise and combine the information you have given us to understand more about you, create new products and services as well as helping us with our marketing.

c) You have given us your permission:

- to use your sensitive personal information in order to provide you with a quotation, price and/or the services set out in your policy documents, for example handling claims or for making reasonable adjustments as a result of a disability you have told us about or your religious beliefs. Where you have provided sensitive personal information about someone connected to you, for example 2nd applicants, you would have confirmed that you have their permission to share this information with us
- to use personal or sensitive information about a child in order to provide you with a quote related to insurance or fulfil the services outlined in your policy documents, such as handling a claim.

4. How do we communicate with you about similar products and services and information

We'll contact you, in order to communicate our products and/or services to you, which we believe may be of interest to you and which relate to your general insurance needs.

There may be times when we'll need your permission to provide information about products and services to you, such as:

- where the product or service is not similar to those that we currently provide to you but we believe you may be interested in it
- when you have opted out of us sending details of or contacting you in relation to the products and services we offer

We may communicate with you by post, email and/or telephone– unless you've told us you don't want us to.

You can ask us to stop contacting you about our products and services by:

Email data.champion@sanctuaryins.com

Post Sanctuary Insurance Brokers Limited, Marlow House, 1a Lloyd's Avenue, London EC3N 3AA

5. Who might we share your information with?

We may share your personal information with:

- other insurers, business partners, agents or carefully selected third parties providing a service to us or on our behalf, such as processing our mail, communicating with customers on our behalf via social media, providing IT systems and administrative services, claims handling services and the development and improvement of our internal databases
- organisations that have a specific role laid out in law, such as statutory bodies, regulatory authorities and other authorised bodies
- other organisations where we have a duty to or are permitted to disclose your personal information by law, for example if we received a valid request from the police or other third party organisation in the interest of preventing and detecting crime
- fraud prevention agencies and operators of registers available to the insurance industry to check information and prevent fraud. This is outlined in more detail under section three of this privacy notice
- another company, if our business or part of it is bought or taken over by that company to make sure your insurance policy can continue to be serviced or as part of preliminary discussions with that company about a possible sale or take over
- other companies when we are trialing their products and services which we consider may improve our services to you or our business processes

- other third parties if you've given us your permission to do so, or there's sufficient reason to believe they're acting on your behalf

Unless required by law, we'd never share your personal data without the appropriate and necessary care and safeguards being in place.

6. How long will we keep your information?

We'll only keep your information for as long as is reasonably necessary for the purposes set out in this privacy notice and to fulfil our legal and regulatory obligations. For further information about how long we'll keep your information, please contact the Data Champion using the contact details outlined in section one of this notice.

7. Use and storage of your information overseas

The personal information we collect from you may be transferred to, stored and processed outside the European Economic Area (EEA). We or our service providers may use cloud based computer systems, for example network of remote servers hosted on the internet which process and store your information, to which foreign law enforcement agencies may have the power to require access. We won't transfer your information outside the EEA unless it was to a country our information regulator has assessed as having adequate data protection laws, or we had taken all reasonable steps to ensure the firm has the necessary privacy and security controls in place to protect your information as if it were in the EEA. Our contracts with these firms will detail the necessary requirements to ensure your information is protected. We'll assess these firm's security arrangements from time to time, ensuring they're only using your information as agreed. If you'd like more information about the safeguards we have in place, please contact the Data Champion whose contact details are outlined in section one of this notice.

8. How will we deal with others acting on your behalf?

To help manage your insurance policy, we'll deal with individuals you nominate, including third parties we reasonably believe to be acting on your behalf, provided they're able to answer our security questions. However, for your protection, if you need to change your contact address, policy coverage or to cancel your policy, we'll need to speak to you directly, your legal representative, someone you've nominated and given us permission to discuss your personal details, or power of attorney.

9. Your rights

You have a number of rights concerning the personal information we use, these include the right to:

- ask for a copy of your personal information
- ask us to correct or delete your personal information
- ask us to restrict or object to the use of your personal information at any time
- where you've previously given us your permission to use your personal information, withdraw that permission. Where your permission is withdrawn, your previous consent will remain valid in respect of our use of your information prior to the date you withdrew it, or if any marketing material has been sent prior to you advising that you don't want us to contact you again
- complain to the Information Commissioner's Office at any time if you object to the way we use your personal information. For more information please go to www.ico.org.uk

To discuss your rights or make a request, please contact the Data Champion using the details outlined in section one of this notice.

Please note, in some cases even when you make a request concerning your personal information, we may not be required, or may not be able, to honour it, as this may result in us not being able to fulfil our legal and regulatory obligations, or there's a minimum statutory period of time for which we have to keep your information. If this is the case, we'll let you know our reasons.