

## About this Policy

The purpose of this Policy is to provide a clear explanation of when, why and how we collect and use information which may relate to you ("personal data").

### 1. What does this Privacy Statement do?

This Privacy Statement ("Statement") explains 1Edge Insurance PCC Limited's ("**1Edge PCC**") information processing practices. It applies to any personal information you provide to 1Edge PCC and any personal information we collect from other sources. This Statement is a statement of our practices and of your rights regarding your personal information. This is not a contractual document, and it does not create any rights or obligations on either party, beyond those which already exist under data protection laws.

We are aware of our responsibilities to handle your personal data with care, to keep it secure and comply with applicable privacy and data protection laws.

This Statement does not apply to your use of a third party site linked to on this website.

### Summary

1Edge PCC collects personal information from its clients about their customers to provide insurance intermediary services, loyalty offerings, and IT services. We also collect some personal information directly, for example over our websites and applications.

1Edge PCC, is a "controller" of data. This means that we are responsible for deciding how we hold and use personal information about you. 1Edge PCC uses personal information to deliver services to clients. For its own purposes, it also uses personal information to analyse and improve how it delivers those services, to contact representatives of its clients or prospective clients and to market to them.

In the event that we use any of your personal information, you will have certain important rights which you can exercise. The rights you will be able to exercise will depend on how and why we use your information.

If you have any questions, would like further information about our privacy and information handling practices, would like to discuss opt-outs or withdrawing consent, or would like to make a complaint about a breach of the Act or this Statement, please contact us on [hello@stubbenedge.com](mailto:hello@stubbenedge.com). Alternatively, you have the right to contact your local Data Protection Authority.

Do read this Policy with care. It provides important information about how we use personal data and explains your statutory rights. This Policy is not intended to override the terms of any insurance policy or contract you have with us, nor rights you might have available under applicable data protection laws.

1Edge PCC Limited is a subsidiary of Stubben Edge Group Limited and Stubben Edge Group Limited is the parent company for Stubben Edge Risk Limited, Lucid Ux Limited, Stubben Edge Wealth Limited, Stubben Edge SA (Pty) Ltd, and Stubben Edge Operations Limited, who could be originally responsible for collecting information about you will be principally responsible for looking after your personal data. We are the Data Controller. If you have an insurance policy with us, this will be the company named on that policy.

### 2. What personal data do we collect

**Prospective Insureds and Insured Persons.** order to underwrite and administer insurance policies, we collect information about the prospective insured, policyholder and related parties. This may include background and contact information on the prospective insured, policyholder or their representative, and matters relevant to the assessment of risk and management of insurance policies. The prospective insured or policyholder may be an individual, company or their representative. The level and type of personal data we collect and use varies depending on the type of policy that is applied for or held and may include information on other individuals who need to be considered as part of the policy. In some

instances, it is necessary for us to collect and use Sensitive Personal Data, such as information about past criminal convictions.

We are required to establish a legal exemption to use your Sensitive Personal Data. If you are an insured person, from time to time you may need to provide us with the personal data of third parties, for example an injured third party in relation to a claim under a liability policy. Wherever possible, you should take steps to inform the third party that you need to disclose their details to us, identifying 1Edge PCC as your insurer. We will process their personal data in accordance with this Policy.

**Claimants.** If you are making a claim under a policy, we will collect your basic contact details, together with information about the nature of your claim and any previous claims. If you are an insured person we will need to check details of the policy you are insured under and your claims history. Depending on the nature of your claim, it may be necessary for us to collect and use Sensitive Personal Data, such as details of personal injury you may have suffered during an accident.

### **Business Partners and Visitors.**

If you are a business partner, we will collect your business contact details. We may also collect information about your professional expertise and experience. We may collect your contact details, if you visit our website, register for a newsletter or attend one of our events. If we collect personally identifiable information through our website, we will make it clear when we collect personal information on the basis contained in this notice.

## **3. When do we collect your personal data?**

### **Prospective Insureds and Insured Persons**

We will collect information from you directly when you apply for a policy.

Information about you may also be provided to us by an insurance broker, your employer, family member or any other third person who may be applying for a policy which names or benefits you.

We may collect information about you from other sources where we believe this is necessary to manage effective underwriting of the risk associated with a policy and/or helping fight financial crime. These other sources may include public registers and databases managed by credit reference agencies and other reputable organisations.

### **Claimants**

We will collect information from you when you notify us of a claim. You might make a claim to us directly, or through your representative or through your broker or one of our representatives who manage claims on our behalf. We may discuss claims with you on the telephone, in person or via video interviews conducted by us or our third party representatives.

We may also collect information about you if the claim is made by another person who has a close relationship with you or is otherwise linked to the claim - for example if the policyholder is your employer, or if you are the subject of a third party claim.

We may also be provided with information by your solicitors (or acting on behalf of your employer).

We may collect information from other sources where we believe this is necessary to assist in validating claims and/or fighting financial crime. This may include consulting public registers, social media and other online sources, credit reference agencies and other reputable organisations.

### **Business Partners and Visitors**

We will collect information about you if you or your company provides your contact or other information to us in the course of working with us, either directly as a business partner or as a representative of your company.

We may also collect information about you if you attend meetings, events or conferences that we organise, contact us through our website or sign up to one of our newsletters or bulletin services.

We may collect information from other public sources (e.g. your employer's website) where we believe this is necessary to help manage our relationships with our business partners.

#### **Applicable to all**

If you telephone 1Edge PCC (for example, when notifying a claim or discussing that claim with us) or if 1Edge PCC telephones you (for example, to sell an insurance policy) we may record the telephone call. We use call recordings as an evidence of your agreement to purchase an insurance policy or submit a claim, to help train our staff and to provide an accurate record of the call in case of complaints or queries. We may also analyse call recordings using automated technology in order to detect where there may be customer service failings (and then to resolve these), or to detect potential evidence of fraud.

#### **4. What do we use your personal data for**

**Prospective Insureds and Insured Persons.** If you are a prospective insured or an insured person we will use your personal data to consider an application for an insurance policy, assess and evaluate risk, and subject to applicable terms and conditions, provide you with a policy. The underwriting process may include Profiling. If we have provided you with your policy we will use your personal data to administer your policy, deal with your queries, and manage the renewal process. We will also need to use your personal data for regulatory purposes associated with our legal and regulatory obligations as a provider of insurance.

**Claimants.** If you are a claimant we will use your personal data to assess the merits of your claim, and potentially to pay out a settlement. We may also need to use your personal data to evaluate the risk of potential fraud, a process which may involve Profiling, which uses automated processes. If you are also an insured person, we will use personal data related to your claim to inform the renewal process and potentially future policy applications.

**Business Partners and Visitors.** If you are a business partner we will use your personal data to manage our relationship with you, including sending you marketing materials (where we have appropriate permissions) and to invite you to events. Where relevant, we will use your personal data to deliver or request the delivery of services, and to manage and administer our contract with you or with your employer. If you are a visitor, we will use your personal data; typically, to register for certain areas of our website, enquire for further information, distribute requested reference materials, or invite you to one of our events.

**Data analytics.** We routinely analyse information in our various systems and databases to help improve the way we run our business, to provide a better service and to enhance the accuracy of our risk and other actuarial models. We take steps to protect privacy by aggregating and where appropriate anonymising data fields before allowing information to be available for analysis.

#### **5. Protecting your privacy**

We will make sure that we only use your personal data for the purposes set out herein, provided you have provided your consent to us using the data in that way

Our use of your personal data is necessary to perform a contract or take steps to enter into a contract with you (e.g. to manage your insurance policy)

Our use of your personal data is necessary to comply with a relevant legal or regulatory obligation that we have (e.g. to comply with FCA/PRA/GFSC requirements), or

Our use of your personal data is necessary to support 'legitimate interests' that we have as a business (for example, to improve our products, or to carry out analytics across our datasets), provided it is conducted at all times in a way that is proportionate, and that respects your privacy rights.

Before collecting and/or using any Sensitive Personal Data we will establish a lawful exemption which will allow us to use that information. If your Sensitive Personal Data is collected on a form (including on a website) or over the telephone, further information about the exemption may be provided on that form. This exemption will typically be:

your explicit consent (if this is specifically requested from you on a data collection form, in language which references your consent);

the establishment, exercise or defence by us or third parties of legal claims; or

a specific exemption provided under local laws of EU Member States and other countries implementing the GDPR which is relevant to the insurance industry, such as the 'insurance purposes' exemption under the UK Data Protection Act 2018.

**PLEASE NOTE.** If you provide your explicit consent to permit us to process your Sensitive Personal Data, you may withdraw your consent to such processing at any time. However, you should be aware that if you choose to do so we may be unable to continue to provide insurance services to you (and where you withdraw consent to an insurer's or reinsurer's use it may not be possible for the insurance cover to continue). This may mean that your policy needs to be cancelled. If you choose to withdraw your consent we will tell you more about the possible consequences, including the effects of cancellation, (which may include that you have difficulties finding cover elsewhere), as well as any fees associated with cancellation.

## **6. Who do we share your personal data with?**

We work with third parties, to help manage our business and deliver services. These third parties may from time to time need to have access to your personal data.

For Prospective Insureds these third parties may include:

Brokers other Insurers and Re-Insurers and TPA's who work with us to help manage the underwriting process and administer our policies

Service Providers, who help manage our IT and back office systems

Our regulators, which may include the FCA, PRA, Guernsey regulatory authority and ICO, as well as other regulators and law enforcement agencies in the E.U. and around the world

Credit reference agencies and organisations working to prevent fraud in financial services

Solicitors and other professional services firms

For Claimants this may include:

Third Party Administrators who work with us to help manage the claims process

Loss Adjusters and Claims Experts who help us assess and manage claims

Service Providers, who help manage our IT and back office systems

Assistance Providers, who can help provide you with assistance in the event of a claim

Solicitors, who may be legal representatives for you, us or a third party claimant

Credit reference agencies and organisations working to prevent fraud in financial services

We may be under legal or regulatory obligations to share your personal data with courts, regulators, law enforcement or in certain cases other insurers. If we were to sell part of our businesses we would need to transfer your personal data to the purchaser of such businesses.

Please see below for relevant definitions:

**Brokers:** insurance brokers arrange and negotiate insurance coverage for individuals or companies and deal directly with insurers, such as 1Edge PCC, on behalf of the individuals or companies seeking coverage.

**Claims Experts:** these are experts in a particular field which is relevant to a claim, for example medicine, forensic accountancy, mediation or rehabilitation, who are engaged by 1Edge PCC to help us properly assess the merit and value of a claim, provide advice on its settlement, and advise on the proper treatment of claimants.

**Data Controller:** means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, a 1Edge PCC entity which sells you an insurance policy will be your Data Controller as it determines how it will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used.

**FCA:** the FCA is the Financial Conduct Authority, which is a financial regulatory body. The FCA focuses on the regulation of conduct by financial services firms.

**GFSC:** the Guernsey Financial Services Commission, which regulates financial services firms in Guernsey.

**ICO:** the Information Commissioners Office regulates the processing of personal data by all organisations within the UK.

**ODPA:** the Office of the Data Protection Authority regulates the processing of personal data by all organisations within Guernsey.

**Prospective Insured and Insured Person:** we use this term to refer to prospective, active or former individual policyholders, as well as any individual who benefits from insurance coverage under one of our policies (for example, where an employee benefits from coverage taken out by their employer).

**Loss Adjuster:** these are an independent claims specialist which investigates complex or contentious claims on our behalf.

**Other Insurers / Reinsurers:** some policies are insured on a joint or "syndicate" basis. This means that a group of insurers (including us) will join together to write a policy. Policies may also be reinsured, which means that the insurer will purchase its own insurance, from a reinsurer, to cover some of the risk the insurer has underwritten in your policy. 1Edge PCC purchases reinsurance, and also act as a reinsurer to other insurance firms.

**PRA:** the PRA is the Prudential Regulation Authority, which is a financial regulatory body. The PRA focuses on the prudential regulation of financial services firms. When discharging its general functions, the PRA is responsible for contributing to the securing of an appropriate degree of protection for policyholders.

**Profiling:** means using automated processes without human intervention (such as computer programmes) to analyse your personal data in order to evaluate your behaviour or to predict things about you which are relevant in an insurance context, such as your likely risk profile.

**Sensitive Personal:** means any personal data relating to your health, genetic or biometric data, criminal convictions, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership. At 1Edge PCC, (other than in the context of our employees, which is outside the scope of this Policy) we routinely only process Sensitive Personal Data relating to health or criminal convictions.

**Service Providers:** these are a range of third parties to whom we outsource certain functions of our business. For example, we have service providers who help us with the administration of setting up a new policy record. Some of these providers use 'cloud based' IT applications or systems, which means that your personal data will be hosted on their servers, but under our control and direction. We require all our service providers to respect the confidentiality and security of personal data.

**Solicitors:** we frequently use solicitors to advise on complex or contentious claims or to provide us with non-claims related legal advice. In addition, if you are a claimant you may be represented by your own solicitor(s).

**Telematics data:** allows a more personalised renewals quote through the use of data provided automatically to us by a device which monitors your behaviour. An example is data collected from a device fitted to a vehicle reflecting driving behaviour.

**Third Party Administrators (or TPA's):** these are companies outside the 1Edge PCC group which administer the underwriting of policies, the handling of claims, or both, on our behalf. We require all TPAs to ensure that your personal data is handled lawfully, and in accordance with this Policy and our instructions.

## **7. Direct Marketing**

We may use your personal data to send you direct marketing communications about our insurance products or our related services. This may be in the form of email, post, SMS, telephone or targeted online advertisements.

In most cases our processing of your personal data for marketing purposes is based on our legitimate interests to provide information you might find helpful to manage your insured risks, insurance renewals and other products, services and offers that may be of interest to you, although in some cases (such as where required by law) it may be based on your consent. You have a right to prevent direct marketing of any form at any time - this can be exercised by following the opt-out links in electronic communications, or by contacting us using the details set out in herein.

We take steps to limit direct marketing to a reasonable and proportionate level, and to send you communications which we believe may be of interest or relevance to you, based on the information we have about you.

## **8. International Transfers**

From time to time we may need to share your personal data with members of the 1Edge PCC group who may be based outside Europe (outside of the European Economic Area). We may also allow our Service Providers or Assistance Providers, who may be located outside Europe, access to your personal data. We may also make other disclosures of your personal data overseas, for example if we receive a legal or regulatory request from a foreign law enforcement body.

We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests:

We will only transfer your personal data to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights;

Transfers within the 1Edge PCC will be covered by an intra-group agreement which gives specific contractual protections designed to ensure that your personal data receives an adequate and consistent level of protection wherever it is transferred within 1Edge PCC;

Transfers to Service Providers and other third parties will always be protected by contractual commitments and where appropriate further assurances;

Any requests for information we receive from law enforcement or regulators will be carefully checked before personal data is disclosed.

You have the right to ask us for more information about the safeguards we have put in place as mentioned above. Contact us if you would like further information.

## 9. How long do we keep your personal data?

We will retain your personal data for as long as is reasonably necessary for the purposes listed in this Policy. In some circumstances we may retain your personal data for longer periods of time, for instance where we are required to do so in accordance with legal, regulator, tax or accounting requirements.

In specific circumstances we may also retain your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings.

We maintain a data retention policy which we apply to records in our care. Where your personal data is no longer required we will ensure it is either securely deleted or stored in a way which means it will no longer be used by the business.

## 10. What are your rights

You have a number of rights in relation to your personal data.

You may request access to your data, correction of any mistakes in our files, erasure of records where no longer required, restriction on the processing of your data, objection to the processing of your data, and various information in relation to any Automated Decision Making and profiling or the basis for international transfers. You may also exercise a right to complain to your supervisory authority. More information about each of these rights can be found by clicking on the relevant link or by referring to the table set out further below.

To exercise your rights you may contact us as set out HEREIN. Please note the following if you do wish to exercise these rights:

Right	What this means
Access	<p>You can ask us to:</p> <p>confirm whether we are processing your personal data;</p> <p>give you a copy of that data;</p> <p>provide you with other information about your personal data such as what data we have, what we use it for, who we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any Decision Making or Profiling, to the extent that information has not already been provided to you in this Policy.</p>
Rectification	<p>You can ask us to rectify inaccurate personal data.</p> <p>We may seek to verify the accuracy of the data before rectifying it.</p>
Erasure	<p>You can ask us to erase your personal data, but only where:</p> <p>It is no longer needed for the purposes for which it was collected; or</p> <p>You have withdrawn your consent (where the processing of data was based on consent); or</p> <p>Following a successful right to object; or</p> <p>It has been processed unlawfully; or</p>

	<p>To comply with a legal obligation to which 1Edge PCC is subject.</p> <p>We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary:</p> <p>For compliance with a legal obligation; or</p> <p>For the establishment, exercise or defence of legal claims;</p> <p>There are certain other circumstances in which we are not required to comply with your erasure request, although these two are the most likely circumstances in which we would deny that request</p>
Restriction	<p>You can ask us to restrict (i.e. keep but not use) your personal data, but only where:</p> <p>Its accuracy is contested to allow us to verify its accuracy; or</p> <p>The processing is unlawful, but you do not want it erased; or</p> <p>it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or</p> <p>You have exercised the right to object, and verification of overriding grounds is pending.</p> <p>We can continue to use your personal data following a request for restriction, where:</p> <p>we have your consent; or</p> <p>to establish, exercise or defend legal claims; or</p> <p>To protect the rights of another natural or legal person.</p>
Portability	<p>You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another Controller, but in each case only where:</p> <p>The processing is based on your consent or on the performance of a contract with you; and</p> <p>The processing is carried out by automated means.</p>
Objection	<p>You can object to any processing of your personal data which has our 'legitimate interests' as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.</p> <p>Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.</p>
Automated Decision Making	<p>You can ask not to be subject to a decision which is based solely on automated processing, but only where that decision:</p> <p>produces legal effects concerning you (such as the rejection of a claim); or</p> <p>otherwise significantly affects you.</p> <p>In such situations, you can also obtain human intervention in the decision making, and we will ensure measures are in place to allow you to express your point of view, and/or contest the automated decision.</p>

	<p>Your right not to be subject to automated decision making does not apply where the decision which is made:</p> <p>Is necessary for entering into or performing a contract with you;</p> <p>Is authorised by law and there are suitable safeguards for your rights and freedoms; or</p> <p>Is based on your explicit consent.</p> <p>However, in these situations you can still obtain human intervention in the decision making, and we will ensure measures are in place to allow you to express your point of view, and/or contest the automated decision.</p>
International Transfers	<p>You can ask to obtain a copy of, or reference to, the safeguards under which your personal data is transferred outside of the European Economic Area.</p> <p>We may redact data transfer agreements or related documents (i.e. obscure certain information contained within these documents) for reasons of commercial sensitivity.</p>
Supervisory Authority	<p>You have a right to lodge a complaint with your local supervisory authority about our processing of your personal data. In the UK, the supervisory authority for data protection is the ICO. In Guernsey, the supervisory authority for data protection is the ODPA.</p> <p>We ask that you please attempt to resolve any issues with us first although you have a right to contact your supervisory authority at any time.</p>
Identity	<p>We take the confidentiality of all records containing personal data seriously, and reserve the right to ask you for proof of your identity if you make a request in respect of such records.</p>
Fees	<p>We will not ask for a fee to exercise any of your rights in relation to your personal data, unless your request for access to information is unfounded, respective or excessive, in which case we will charge a reasonable amount in the circumstances. We will let you know of any charges before completing your request.</p>
Timescales	<p>We aim to respond to any valid requests within one month unless it is particularly complicated or you have made several requests in which case we aim to respond within three months. We will let you know if we are going to take longer than one month. We might ask you if you can tell us what exactly you want to receive or are concerned about. This will help us to action your request more quickly.</p>
Third Party Rights	<p>We do not have to comply with a request where it would adversely affect the rights and freedoms of other data subjects.</p>

## 12. Contact and complaints

The point of contact for all issues arising from this Policy, including requests to exercise data subject rights, is Willis Towers Watson Management (Guernsey) Limited as Insurance Manager.

The Insurance Manager can be contacted in the following ways:

Email: [Hello@1edgeinsurance.gg](mailto:Hello@1edgeinsurance.gg)

**Write to:**

1Edge Insurance PCC Limited

C/O Willis Towers Watson Management (Guernsey) Limited

Suite 1 North

1st Floor

Albert House

South Esplanade

St Peter Port

Guernsey

GY1 1AJ

If you have a complaint or concern about how we use your personal data, please contact the Insurance Manager in the first instance and we will attempt to resolve the issue as soon as possible. You also have a right to lodge a complaint with your national data protection supervisory authority at any time.