

CHEDID REINSURANCE BROKERS (DIFC) LIMITED PRIVACY NOTICE

INTRODUCTION

Chedid Reinsurance Brokers (DIFC) Limited and all its affiliates and subsidiaries (collectively, ("**We**", "**Us**", "**Our**", "**Chedid Re**") value your privacy and are committed to safeguarding your personal information.

This Privacy Notice outlines Our practices regarding the collection, use, retention, disclosure, and protection of the personal data of Our Customers in line with the Data Protection Law, DIFC Law No.5 of 2020 and any amendments or implementing regulation thereof (the "**DIFC DP Law**") and any other applicable data protection Law (together with the DIFC DP Law, the "**Data Protection Law**").

This Privacy Notice does not cover third-party websites, applications, or portals ("**Sites**") that link to Chedid Re's Sites or Sites that have distinct privacy notices. If you supply Us with personal data about others, you are required to share this Privacy Notice with them and obtain any necessary consents for processing their data as described in this Privacy Notice.

1. WHO WE ARE

Chedid Reinsurance Brokers (DIFC) Limited is a reinsurance broker incorporated in the Dubai International Financial Centre ("**DIFC**"), Dubai, United Arab Emirates ("**UAE**") with Commercial License number CL7712 and licensed by the Dubai Financial Services Authority ("**DFSA**") to carry out insurance intermediation and insurance management services under DFSA Trade License number F008342.

As a reinsurance broker, We may collect Personal Data from you for specific purposes in line with Our licensed activities and the services We provide (the "**Services**").

2. WHAT IS PERSONAL DATA?

Personal Data is any information about an identifiable individual. This means any information that allows a person to be identified, directly or indirectly. Such identifiers could be anything from a name, an identification number, location data, to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person

3. INDIVIDUALS IN SCOPE

This Privacy Notice provides information for those individuals whose Personal Data We process, including:

- Business-related contacts such as brokers, (re)insurers, managing agents, loss adjusters, experts involved in claims, service providers, suppliers, professional advisors, conference attendees, office visitors, and government officials.
- Customers and individuals linked to Our (re)insurance operations, such as insured parties, potential and actual beneficiaries, claimants, and others connected to claims, along with customers associated with Our diverse services like health and benefit plan sponsors, pension trustees, and individuals related to premium financing services.
- Users of Our Sites.
- Other individuals such as those who engage with Our marketing materials, make inquiries, or are featured in marketing materials or captured on Our CCTV systems.

4. WHY DO WE COLLECT YOUR PERSONAL DATA?

When We collect your personal data, We alone determine the purposes and means of such processing as a

Controller.

We collect your personal data primarily to assist and advise you on your insurance interests and needs and the terms and conditions of any Insurance Policy placed through Us.

When We request information from you, including but not limited to queries, surveys, or requests for clarification, please note that your responses are voluntary unless explicitly stated otherwise by law or contractual obligation.

We acknowledge that your decision not to provide certain information requested may limit Our ability to fulfill certain services or obligations or affect the quality and efficiency of Our interactions. However, We assure you that such decisions will not result in discriminatory treatment or prejudice against you.

We commit to informing you when certain information is mandatory to continue providing services to you. In such cases, We will clearly communicate the necessity of providing the requested information to ensure uninterrupted service delivery.

We may process Personal Data for the following purposes that are inherent to Our services:

- To provide reinsurance consultancy and advisory services.
- To provide reinsurance brokerage services and, where instructed to do so, place your business with reinsurance providers.
- To advise you on risk management and assessment.
- To process applications and determine the suitability of the products and services for your reinsurance needs.
- To handle administrative tasks such as correspondence, invoicing and record keeping.
- To administer, manage and process reinsurance claims.
- To detect and prevent fraud.
- For onboarding purposes including AML/CFT clearances.

We may also process your personal data:

- To improve Our customer service and reply to all your queries.
- For analytics purposes
- To develop proprietary tools and databases
- To comply with legal, audit, security and regulatory requirements
- Facilitate significant business changes like mergers, acquisitions, or reorganizations, ensuring that your personal data continues to be handled appropriately.
- For direct and indirect marketing and promotion purposes. If We send you newsletters, you may opt out of receiving future marketing communications. You have the right at any time to stop Us from contacting you for marketing purposes or giving your data to other members of Our Company Group for marketing purposes.

If there is a need to use your personal data for other purposes not outlined here, or which are incompatible with the original purposes for which your data was collected, We will inform you of this new purpose and, where required by law, seek your consent.

5. HOW DO WE COLLECT YOUR PERSONAL DATA?

We may collect your Personal Data either:

- i. Directly from you or your authorized representatives when you initiate communication with Us, *via* electronic mail, facsimile, telephone including from any of Our Sites, surveys, live events, market research, and other direct communications and/or solicitations.

- ii. Directly, from you when We communicate with you to answer a query, We received from you or to ask you about missing, incomplete or inaccurate information related to your (re)insurance needs or in order to complete your transactions.
- iii. From Clients and business partners like commercial clients, (re)insurers, network partners, brokers, employers, administrators of benefit plans, companies financing premiums, providers of health services, pension trustees, providers of data/marketing lists, and third-party service providers.
- iv. From public resources such as social media platforms, registers of property and assets, and records of claims and convictions.
- v. From Companies affiliated with Us.
- vi. From Government bodies including police and regulatory authorities.
- vii. Through background verification and screening tools, which include databases for detecting and preventing fraud in the insurance sector, credit reporting agencies, and tools for screening sanctions.
- viii. From other third parties.

We may seek your express consent to the collection, use or disclosure of your personal information. In compliance with the law, will seek your express consent when (a) it is highly sensitive (special categories of personal data), (b) for marketing and promotional purposes or (c) when required for a new purpose. We may obtain your consent by asking you to check a box, to consent to an agreement or to take another affirmative action. We may also rely on your implied consent to the extent permitted by applicable laws.

6. WHAT TYPE OF DATA DO WE COLLECT FROM YOU?

We may collect from you the following information:

- a. **Personal Information**, such as name, contact information (email address, phone number), date of birth, nationality, marital status, salary information, information about people related to you such as details of relationships, family members and dependents and other relevant identification details.
- b. **Unique identifiers**, such as identification numbers issued by government bodies or agencies (e.g., your national identifier number or social security number, passport number, ID number, tax identification number, driver's license number, birth, death and marriage certificates, and copies of official documents).
- c. **Employment information**, such as your job title, employer, employment status, salary information, employment benefits, pensionable service periods, employment history and professional certifications and training.
- d. **Insurance Information**, such as information about your insurance needs and preferences, including your policy number, policy start and end dates, premiums, individual terms, mid-term adjustments, reasons for cancellation, risk profile, details of policy coverage, enrolment, eligibility for insurance or benefits, benefit amounts and underwriting history.
- e. **Claim information**, such as a claimant's relationship to a policyholder/insured, claims history and claims data, and the date and particulars of a claim, including causes of death, injury or disability and claim number.
- f. **Commercial information**, such as records of your personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- g. **Events or meeting information**, such as details about your visits to Our offices (including CCTV), your interest in and attendance at events or meetings, audio recordings, photographs or videos captured during meetings, events or calls with you.
- h. **Lifestyle information**, such as your destination and timeline for any travel insurance policy you are interested in, travel history and plans and general health data.
- i. **Special category data and sensitive personal data**, such as data relating to your health (including protected health information), genetic or biometric data, sex life, sexual orientation, gender identity, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership.

- j. **Criminal records information**, such as criminal charges or convictions, including confirmation of clean criminal records.
- k. **Personal information received from background checks and sanctions screenings**, including status as a politically exposed person.
- l. **Marketing information**, such as your consent to or opt out from receiving marketing communications from Us and/or third parties, your marketing preferences, or your interactions with Our marketing campaigns and surveys, including whether you open or click links in emails from Us or complete Our surveys.
- m. **Sites and communication usage information**, such as your username, your password, other information collected by visiting Our Sites or collected through cookies and other tracking technologies as described in Our cookie policy, including your IP address, domain name, your browser version and operating system, traffic data, location data, browsing time, and social media information, such as interactions with Our social media presence.

7. LAWFUL BASIS FOR PROCESSING PERSONAL DATA

We are required, under the Law, to have a lawful basis to process your Personal Data. Below are instances that shall constitute a lawful basis when We process your Personal Data:

- a. We have sought and you have given your explicit consent, in compliance with the Law, to the Processing of your Personal Data for one of the purposes specified in this Privacy Notice. This is generally applicable when We collect a special category of Personal Data from you.
- b. Processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into such contract;
- c. We are obliged to process your Personal Data to comply with applicable laws;
- d. Processing is necessary in order to protect your vital interests or those of another natural person;
- e. Processing is necessary for the purpose of legitimate interests pursued by Us or a Third Party to whom the Personal Data has been made available, subject to the Data Protection Law and except where such interests are overridden by your interests or rights or those of another Data Subject. Processing your Personal Data for legitimate interests include but are not limited to activities such as pursuing, entering, or fulfilling contracts, managing Our business records, documenting insurance policies or other products We handle, and evaluating and enhancing Our business operations, services and systems. When utilizing your personal information for these objectives, We guarantee that Our business requirements align with the rights granted to you by applicable laws.

8. FOR HOW LONG DO WE COLLECT YOUR PERSONAL DATA?

The Personal Data We collect is strictly processed to provide you with the Services.

We will store your Personal Data in compliance with the data minimisation and storage limitation principles provided for in the DIFC Data Protection Law. We will keep your Personal data for as long as it remains necessary for the purposes mentioned in the present Privacy Notice or as required by law, which may extend beyond the termination of Our relationship with you. We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally identifiable data, account recovery, or if required by law. All retained personal information will remain subject to the terms of this Privacy Notice. If you request that certain Personal Data be removed from Our databases, it may not be possible to completely delete all your Personal Data due to technological and legal constraints.

9. SHARING OF YOUR PERSONAL DATA:

We may share your information with Our affiliates, employees, agents and representatives for internal audit, management, billing, administrative, legal, other business purposes and for marketing and promotional purposes (in line with the present Privacy Notice), and with Our service providers who assist Us in delivering Our Services, such as analytics, email communication, and IT support.

When you choose to place your insurances with a (re)insurance provider, We may share your Personal Data with that specific (re)insurance provider, who may in turn share your Personal Data with its affiliates, employees, agents, service providers, banks, payment gateway operators within its business operations to enhance the insurance products usefulness and suitability and provide you with the best customer service.

Our business partners, acting as Processors such as customers, (re)insurance companies, MGAs, brokers, other insurance intermediaries, claims handlers or other companies who act as insurance distributors, may process your Personal Data on Our behalf, adhering strictly to Our instructions. In this case they are bound to process your Personal Data in alignment with this Privacy Notice and the terms outlined in the data processing agreements We have established with them. Any third-party service provider We share your Personal Data with is contractually bound to protect your privacy. They are only authorized to use your Personal Data to provide the services to Us and for no other purpose.

Some of Our business partners, including (re)insurance providers, may process your Personal Data as Controllers. Whether they collect your Personal Data indirectly or directly, it will be subject to their respective privacy policies. We encourage you to review these privacy policies carefully to understand how each partner serving you manages your Personal Data and ensures your privacy protection.

We may also share your information with relevant authorities when required by law or in response to legal processes, all in compliance with applicable laws.

10. TRANSFERRING YOUR PERSONAL DATA

We operate as a global business and may transmit your Personal Data across borders, including within Chedid Re's group of companies and to certain third parties, including Our partners and service providers. This sharing of data allows Us to provide you services as set out in Our underlying agreement or as otherwise indicated in this Privacy Notice. When required by applicable law, We will obtain your explicit consent before transferring your data.

The laws that apply to the country where the data is transferred may not be equivalent to that in your local country (or in the country in which We provide the services). Transfers of Personal Data will comply with applicable law and be subject to suitable safeguards to ensure an adequate level of protection, including, where required, the use of standard contractual clauses approved by the local data protection regulator, that require each party to ensure that the Personal Data receives an adequate and consistent level of protection.

In all such cases, and generally for any processing operations, We take appropriate security measures to protect your Personal Data in accordance with this Privacy Notice, including:

- i. One of the appropriate safeguards is in place under Article 27(2) of the DIFC DP Law 2020.
- ii. The country to which the Personal Data is transferred ensures an adequate level of protection for your rights and freedoms.
- iii. You have given your consent.
- iv. The transfer is necessary for one of the reasons set out in the applicable laws, including the performance of a contract between you and Us, or to protect your vital interests.
- v. The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.
- vi. The transfer is authorised by the relevant data protection authority where We have adduced adequate safeguards with respect to the protection of your privacy, your fundamental rights and freedoms, and the exercise of your rights.

Please contact Us using the details provided under the Contact Us section if you would like further information regarding Our international transfers and the steps We take to protect your Personal Data when sending it

internationally.

11. YOUR RIGHTS:

You have certain rights in respect of your Personal Data under DIFC Data Protection Law.

Right to access your Personal Data

You have a right to ask Us for copies of your Personal Data and certain details of how We use it.

Right to rectification

You can have Us correct or update your Personal Data if it is incorrect or incomplete. There might be situations where technical issues prevent Us from making changes.

Right to Erasure

You can ask Us to delete your Personal Data under certain conditions, such as when you withdraw consent or the data is no longer needed for its original purpose. However, legal obligations or technical limitations might restrict Our ability to erase your data. In such cases, We will cease processing your data.

Right to Restrict Processing

You can limit how We use your Personal Data in certain situations, for instance, if you believe the data is inaccurate or no longer needed.

Right to Data Portability

You can request that We transfer your Personal Data to another organization under certain circumstances.

Right to Object

You can object to the processing of your Personal Data, particularly if it is based on Our legitimate interests. You can also stop Us from sending you direct marketing communications at any time.

Rights Related to Automated Decision-Making

You can request not to be subject to decisions made solely on automated processing, including profiling, that have legal or significant effects on you.

Right to Withdraw Consent

When We ask for your consent to use your Personal Data, you have the freedom to withdraw this consent at any time.

Right to Complain

If you have concerns about how We handle your Personal Data, you can raise them with Us, and We will strive to address them. You also have the right to lodge a complaint with the DIFC Commissioner of Data Protection if you believe We are violating data protection laws. Withdrawing your consent or complaining won't affect any other legal rights or remedies available to you.

Consequences of Exercising your Rights

Not providing Personal Data, or exercising certain rights, might prevent Us from offering you specific products or services, such as maintaining or providing insurance. For example, invoking your right to erasure could affect your ability to claim or benefit from certain services, especially if it impacts Our ability to process claims. your policy terms will detail the implications should your policy be cancelled.

12. DATA SECURITY

The security of your Personal Data is important to Us. We employ industry-standard security measures to protect your personal information from unauthorized access, disclosure, alteration, or destruction.

You are also responsible for helping to protect the security of your Personal Data. For instance, never give out your email account information or your password for the Services to third parties.



We will maintain the confidentiality of any contact information you provide to Us when you sign up for Our Services, marketing communications, or contact Us with questions or for further information and We will use it only for the purposes for which We have collected it (subject to the exclusions and disclosures We have listed in this Privacy Notice), unless you agree that We may disclose it to other third parties.

13. COOKIES

You can set your browser to refuse all or some cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of Our Website may become inaccessible or not function properly. For more information about the cookies We use, please see Our Cookie Policy.

14. CHILDREN'S PRIVACY:

Our Services are not intended for individuals who don't have the legal capacity to use the Services under the DIFC, Dubai, United Arab Emirates applicable Laws and Regulations. We do not knowingly collect, use or disclose personal information about children.

If you are a minor, please do not provide any Personal Data even if prompted to do so. If you believe that you have inadvertently provided Personal Data, please ask your parent(s) or legal guardian(s) to notify Us. In the event that We learn that We have inadvertently collected Personal Data via Our Sites from a child, We will delete that information as quickly as possible.

15. CHANGES TO THIS PRIVACY NOTICE:

We may update this Privacy Notice from time to time to ensure it reflects legislative changes and Our ongoing commitment. The most current version will be posted on the Website, and the revised date will be indicated.

16. CONTACT US:

If you have any questions, concerns, or requests related to your privacy, please contact Us at:

Email: privacy@chedidre.com

Phone number: 00971528081169

Address: Gate Precint 4, Level 6, Unit OF-14. P.O. Box 283541, Dubai, UAE

By utilising Our services, or by maintaining communication with Us, you affirm that you have thoroughly read and understood this Privacy Notice, and hereby consent to its terms.