

Privacy Notice

Howden Specialty
Asia Pacific

June 2022



Our commitment to privacy

within Howden Specialty Asia Pacific

Howden Specialty Asia Pacific (“Howden Specialty”, “we”, “us”, “our”) refers to a group of (re)insurance intermediary entities that operate in different locations throughout the region. Each of these entities need to collect, process and share information, including personal data, in order to deliver their services. We understand our responsibilities to handle your personal data with care, to keep it secure and to comply with applicable data protection laws. Please refer to the [Appendix](#) for a full list of these entities, their registration details, the locations in which they operate, and their contact details.

The purpose of this Privacy Notice is to provide you with a clear explanation surrounding how and why we collect and use your personal data, and to explain your legal rights with respect to your personal data. It is not intended to override the terms of any agreement or other contract which you have with us or any rights you might have available under applicable data protection laws.

We may amend this Privacy Notice from time to time for example, to keep it up to date or to comply with legal requirements or changes in the way we operate our business. We will notify you about material changes by prominently posting a notice on www.howdenspecialty.com. We encourage you to potentially check back and review this Privacy Notice so that you will always know what information we collect, how we use it, and with whom we share it.

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1. About Howden Specialty

Howden Specialty, part of Howden Group Holdings (“HGH”), is in the business of (re)insurance broking. Its services consist primarily of (re)insurance intermediation, which facilitate the consideration of, access to, administration of, and making of claims in respect of, (re)insurance services.

Our wholesale teams include International Property, Natural Resources, Logistics, Construction, Financial Lines, Reinsurance and other specialty products. We serve mostly corporate clients or intermediaries, though you may be a consumer client providing us with Personal data as well. Our wholesale teams provide (re)insurance placements and claims settlement services to (re)insurers, brokers and (re)insurance intermediaries.

2. Who does this Privacy Notice relate to?

This Privacy Notice relates to the **following types of Relevant Individuals** (“you”, “your”, “data subjects”), where we hold your personal data:

- Directors, authorized personnel, beneficial owners, other associates of, or persons exercising control over the corporate client or intermediary that we do business with;
- Employees, clients, policyholders or any other third party individuals of a corporate client or an intermediary providing us with personal data about other individuals;
- Individuals who are clients, including prospective clients who have received a (re)insurance quotation, former clients who have previously held an (re)insurance policy arranged or administered by us, and client representatives, for example those with power of attorney;
- Representatives and contacts associated with prospective, current and former clients;
- Visitors to our website;
- Individuals who contact us with a query, concern or complaint;
- Individuals named on (re)insurance policies, such as joint policy holders, or beneficiaries;
- Individuals who request information from us or permit us to contact them for marketing purposes.

There are types of individuals who this Privacy Notice does not relate to, for example our employees and sub-contractors (including prospective and former employees and sub-contractors). If you are one of these individuals and would like further information on how we collect, use and store your information, please contact us using the contact details set out in [Section 12](#).

3. What personal data do we collect?

Depending on your relationship with us, we may hold the following types of personal data about you:

- **Identity and contact data:** for example, your name, date of birth, postal address, telephone number and e-mail address.
- **Claims data:** for example, data relating to claims made via us, or your previous claims experience.
- **Payment and account data:** for example, your bank account details or brokerage fees.
- **Location data:** for example, your postal or IP address, the location of any insured property, and in the event of a claim, where the incident occurred.
- **Correspondence data:** for example, copies of letters and e-mails we send or sent to us, and notes or call recordings of any telephone conversations.
- **Internet data:** for example, information collected by cookies and other online technologies such as Google Analytics, as you use our website or contact us by online methods.
- **Information we obtain from other sources:** for example from credit agencies, anti-fraud and other financial crime prevention agencies and other data providers. This can include demographic data and interest-based data.
- **Complaint data:** for example, what the complaint was, how we investigated it and how we resolved it, including any contact with third party adjudicator services.

4. How do we collect personal data?

We collect personal data in various ways including:

- Through **direct interactions** with you, for example if you contact us through our website, by email, by post, by phone, or if you request a service from us
- Through **automated technologies such as cookies** when you visit or use our websites
- From **third parties**, for example if your employer or an intermediary completes a proposal form or questionnaire in which they provide us with your personal data. In such cases we ask them to provide you with a copy of our Privacy Notice
- From **publicly available sources**, for example to satisfy our due diligence processes for new and existing clients

5. Purposes

We collect personal data for the following **purposes**:

- to provide our clients with a (re)insurance quotation;
- to start, change, administer or cancel a (re)insurance policy;
- to manage any claims which arise;
- to answer any queries our clients or their third party individuals may have, action requests or perform any debt recovery;
- to fulfill your rights under data protection laws;
- to handle complaints about data privacy or our financial products and services;
- managing and responding to requests and/or queries from the applicable regulatory or judicial authority (including authorities outside of the location in which personal data is collected);
- internal and external audits being conducted on the HGH;
- to comply with other legal requirements such as preventing money laundering and other financial crimes and for statutory / regulatory reporting purposes;
- to offer a renewal;
- to detect and prevent fraud;
- to carry out due diligence or other screening activities in accordance with legal or regulatory obligations or risk management procedures that may be required by law or internal compliance policies and procedures;
- for statistical analysis in order to monitor and improve our business and our products and services;
- to demonstrate compliance with applicable laws and regulations;
- to market our services.

6. Marketing

We may collect personal data from **Relevant Individuals in their official capacities** (for example, business contact information) to send them marketing communication, including using this information to invite Relevant Individuals to seminars, events etc. that we consider to be relevant to them. Our services are meant for the exclusive use of the corporation. We generally do not use personal data to market to, or send marketing communications to, Relevant Individuals in their personal capacity. Where required by data protection law, we would obtain your prior specific consent to use your contact information to send you marketing communications.

7. Who do we share your personal data with?

We share your personal data with the following types of third parties if it is necessary for the purposes described in Section 5 and in particular for the arrangement, placement and administration of (re)insurance policies or the provision of services to our clients and their third party individuals, if it is required for us to obtain IT support, storage or back up services which are necessary to carry on our activity and/or to comply with our legal and regulatory obligations (eg. our Know-your-Customer and Anti-Money Laundering obligations), to handle complaints, errors and omissions or for statistical analysis to improve our services to you:

- Other HGH companies (including those who are in run-off but who may still carry out certain regulated activities) and our Appointed Representatives;
- (Re)insurers and intermediaries including but not limited to other Insurance Brokers and Managing General Agencies;
- Risk Management Assessors, Uninsured Loss Recovery Agencies and Third Party Administrators who work with us to help manage the process and administer our policies;
- Service Providers who help manage our IT and back office systems, or who provide platforms and portals for administering policies and member details;
- Our regulators and law enforcement agencies (including authorities outside of the location which personal data has been collected);
- Credit reference agencies, Premium Finance Providers, and organisations working to prevent fraud in financial services;
- Solicitors (who may be legal representatives for you, us or a third party claimant) and other professional services firms (including our auditors);
- Marketing fulfilment, webinar and customer satisfaction service providers, acting on our behalf in facilitating online events, providing marketing communications and capturing feedback from our customers on our service levels;
- Third Party Administrators, Loss Adjusters and Claims Experts who work with us to help manage the claims process;
- Potential purchasers of our businesses.

You may also contact us using the contact details set out in [Section 12](#) for more information about these third parties.

Use of information within HGH

As Howden Specialty is part of a global organization that operates across borders, we may make your information available to other companies which are part of HGH, including Howden Specialty offices located in Asia Pacific and listed in the [Appendix](#), other Howden Specialty offices outside of Asia Pacific, our Head Office in the UK, or other HGH companies. Further information can be found under www.howdenspecialty.com/locations and www.howdengroupholdings.com/about-us/our-businesses.

These companies may use this information to provide administrative, IT or infrastructure support to Howden Specialty, for statistical analysis, business reporting, or for business development purposes for which they may be remunerated, such as providing market insight to (re)insurers on a confidential basis. Your personal data will only be disclosed to third parties outside of HGH in accordance with data protection laws, or in an anonymised and/or aggregated format, to support the purposes set out in [Section 5](#).

8. International Transfers

For business purposes, to help prevent/detect crime or where required by Law or Regulation, we may need to transfer, or allow access to, your personal data to the aforementioned parties who may be based overseas. Before we transfer personal data outside the location in which it was collected, we will meet the applicable data protection requirements that apply to cross-border transfers of personal data, and will require recipients to protect your personal data at levels not lower than those required by the applicable data protection laws. In any case, we will adopt contractual and/or technical, organizational and physical security measures to safeguard any transfer.

9. Methods

Personal data may be collected, processed and disclosed by any **automatic or non-automatic means** (including using electronic files or hard copies).

10. How long do we keep your personal data?

We will **retain your personal data only for as long as is necessary to fulfil the purpose as set out in [Section 5](#)**, or as required by applicable laws.

11. What are your rights?

Data Protection laws give you rights relating to your personal data. This section provides an **overview of your data rights and how these vary by country**. Your exercise of these rights is subject to the extent provided for in the applicable data protection laws. If you exercise any of these rights we will check your entitlement and respond in most cases within a month.

Location	Data Rights	Description
Australia, Mainland China, Hong Kong, Singapore & Taiwan	Right to access	You have a right to inquire whether we are processing your personal data and, if we are, request copies of the personal data we hold on you, along with an explanation of personal information handling rules such as the ways in which the personal data has been or may have been used or disclosed by us. This right always applies, but there are some instances where we may not be able to provide you with all the information we hold. If this is the case, we will confirm why we are unable to provide it - unless there is a valid legal reason that means we cannot let you know why
	Right to supplement or correct	If personal data we hold is inaccurate or incomplete, and this has an impact on the way we are using your data, you have the right to have any inaccuracies corrected and for any incomplete data to be completed. If you ask us to rectify your personal data, we will either confirm to you that this has been done, or if there is a valid reason that this cannot be done, we will let you know why
	Right to object to direct marketing	You can object to receiving direct marketing from us, for example by clicking on the unsubscribe link in any email you receive from us or by writing to us using the details under Section 12 . If you do so, we will ensure that you do not receive such material going forward, unless you change your mind and specifically request it in the future

Location	Data Rights	Description
	Right to withdraw consent	You have the right to withdraw your consent where we rely on this in order to process your personal data, and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above. We will inform you of the impact of withdrawing consent prior to processing your request. While Taiwan data protection law does not provide for an explicit right to withdraw consent, you can ask us to stop the collecting, processing or use of your personal data.
Mainland China and Taiwan	Right to erasure	You have the right to request that your personal data is erased in certain circumstances. If you ask us to erase your personal data, we will either confirm to you that this has been done, or if we are unable to delete it, let you know why and also inform you how long we will hold it for.
	Right to restrict the handling, or stop the processing, of your data	You can ask us to restrict or terminate the collection, processing and use of your personal data (to the extent that such personal data is not necessary for us to conduct business). If you do so, we will either confirm to you that this has been done, or if we are unable to do so, we will inform you why
Mainland China	Right to data portability	In certain circumstances, you have the right to request that your personal data be transferred to a third party designated by you. Your personal data can be compiled into a common, machine readable format and either provided directly to you or sent by us to a third party you nominate. If you request this, we will either act upon your instruction and confirm to you that we have done so, or if there is a valid reason that this cannot be done, we will tell you why

Location	Data Rights	Description
	Right to object to automated decision-making	You have the right to ask us to explain where automatic decision-making has a significant impact on your rights and interests. You can object to decisions made about you using your personal data undertaken by purely automated means. If you do so, we will arrange for someone to assess the automated decision and confirm the outcome of this assessment to you.

For more details of your data subject rights as permitted under the applicable data protection laws, you may refer to the **following websites of the governing authorities**:

Location	Governing Law	Governing Authority & Website
Singapore	Personal Data Protection Act 2012	Personal Data Protection Commission https://www.pdpc.gov.sg
Hong Kong	Personal Data (Privacy) Ordinance	Office of the Privacy Commissioner for Personal Data, Hong Kong https://www.pcpd.org.hk
Australia	Privacy Act 1988; Australian Privacy Principles	Office of the Australian Information Commissioner https://www.oaic.gov.au
Taiwan	Personal Data Protection Act	National Development Council https://www.ndc.gov.tw
Mainland China	Personal Information Protection Law of the PRC	Cyberspace Administration of China https://www.cac.gov.cn

12. How you can contact us

The primary point of contact for all issues arising from this Privacy Notice, including any concerns, complaints or requests to exercise data subject rights, is our **APAC Data Protection Officer**, who can be contacted via an email to dpo.hsapac@howdengroup.com

Please do note the following if exercising one of your rights:

- 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;
- 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, repetitive 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;
- 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 will let you know. We might ask you if you can help by telling us what exactly you want to receive or are concerned about. This will help us to action your request more quickly;
- Local laws may provide for additional exemptions, in particular to the right of access, whereby personal data can be withheld from you in certain circumstances, for example where the material interests of any third parties may be adversely affected.

Appendix – Office Details

Legal Entity & Company Reg No.	Address	Authorised/ Regulated by
Singapore Howden Specialty Asia Pacific Pte. Ltd. (200907156H)	79 Robinson Road, #13-02, Singapore 068897	Monetary Authority of Singapore
Hong Kong Howden Specialty Limited (462011)	35/F Citicorp Centre, 18 Whitfield Road, Causeway Bay, Hong Kong	Insurance Authority
Australia Howden Reinsurance Brokers (Australia) Pty. Limited (626046393)	Level 19, 333 George Street, Sydney, NSW 2000, Australia	Australian Securities & Investments Commission
Taiwan Howden International Broking Limited, Taiwan Branch (28972672)	12F-1, No. 51, Sec. 2, Keelung Road, Xinyi District, Taipei, Taiwan	Financial Supervisory Commission, Insurance Bureau
Mainland China Howden Specialty Limited Beijing Representative Office (91110000671703591P)	Regus IFC Centre, Office 1065, 10/F, IFC East Tower, 8 Jianguomenwai Avenue, Beijing 100022	China Banking and Insurance Regulatory Commission

www.howdenspecialty.com

