

CUSTOMER PRIVACY NOTICE

This Privacy Notice is dated March 2022.

1. INTRODUCTION

Cowen Insurance Company Ltd (“**Cowen**”, “**we**”, “**us**” or “**our**”), and its affiliated and associated entities, respect your privacy and are wholly committed to protecting the confidentiality and security of your personal data.

As a brief summary, Cowen is an authorised insurance company providing primarily non-life insurance products and services on a cross-border basis. We are duly authorised in Malta under the Insurance Business Act, 1998, Chapter 403 of the laws of Malta, to carry on business of insurance from Malta to other European Union (“**EU**”) Member States and are regulated by the Malta Financial Services Authority (“**MFSA**”). We distribute our insurance products and services from Malta to the EU and European Economic Area via our appointed intermediaries. Furthermore, we also conduct business in the United Kingdom (currently through the “Temporary Permissions Regime” established by the Financial Conduct Authority) and have made available a number of our products and services on that market.

The purpose of this Privacy Notice (the “**Notice**”) is to explain how we will process your personal data when you:

- request a quotation for any of our products or services or interact with us in any manner;
- apply for, purchase or otherwise use any of our products or services; or
- make a claim under or in connection with any product or service acquired from us;

and, in each case, whether directly with us or through any of our appointed intermediaries.

Where we have entered into an agreement with a company or individual (the “**Policyholder**”) to provide insurance cover for a specified group under a group insurance policy, such as for example a group benefit plan, we will in such cases also need to process the personal data of the individuals who have been named or enrolled as a beneficiary or subscriber under that policy (each referred to as a “**Beneficiary**”).

This Notice therefore also explains how we process personal data on Beneficiaries and should be circulated accordingly. Thus, where a Policyholder provides or intends to provide us with any information about any Beneficiary, that Policyholder must circulate our Notice to that Beneficiary and procure and confirm to us that the Beneficiary is fully aware that you have shared his or her personal data with us and understands that we will collect and process his/her personal data in accordance with, and for the purposes set out, in this Notice.

In this Notice, “*you*” is used to refer to both Policyholders and Beneficiaries.

PLEASE READ this Notice carefully and share with any Beneficiaries that may be covered under your policy.

2. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

We are a controller of your personal data and, in certain respects, act as a joint controller together with the appointed intermediary who is handling your policy. This joint controller relationship is explained later on in this Notice.

We process your data in an appropriate and lawful manner, in accordance with the Maltese Data Protection Act (Chapter 586 of the Laws of Malta) (the “Act”), including its subsidiary legislation, and the General Data Protection Regulation (the “GDPR”), each as may be amended, supplemented or replaced from time to time.

This Notice aims to ensure that you are fully informed on how Cowen (as your insurance provider) will collect and process your personal data. It informs you about the items of personal data which we will collect about you and describes how we will handle it (regardless of the way you interact with us, whether by email, phone, through an intermediary or otherwise), and in turn, also tells you about (i) our obligations in regard to processing your personal data responsibly, (ii) your data protection rights as a data subject and (iii) how the law protects you.

This Notice should be read in conjunction with our terms of business.

If you have any questions relating to this Notice, including any requests to exercise your legal rights (which are described at **Section 10**), please contact us, by email or in writing, using the contact details set out below.

DATA PROTECTION OFFICER

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this Notice, and for handling any data subject requests. If you have any questions or requests, including any requests to exercise your legal rights as a data subject, please contact our DPO using the details set out below.

Contact Details

Full name of legal entity: Cowen Insurance Company Ltd
Email address: dpo@cowen-insurance.com

You have the right to lodge a complaint at any time to a competent supervisory authority on data protection matters, such as (in particular) the supervisory authority based in the place of your habitual residence or your place of work. In the case of Malta, this is the Office of the Information and Data Protection Commissioner (the “IDPC”) (<https://idpc.org.mt>). We would, however, appreciate the opportunity to deal with your concerns before you approach the supervisory authority, so please do contact us in the first instance.

Please use the words ‘**Data Protection Matter**’ in the subject line.

YOUR DUTY TO INFORM US OF CHANGES

It is imperative that the personal data that we and the intermediary handling your policy hold about you is accurate and current at all times. Otherwise, this will impair our ability to provide the products or services which you have requested (amongst other possible issues). Please keep both of us informed if your personal data changes at any time.

3. THE DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that individual can be identified. It does not include where the identity and other identifiers have been removed (**anonymous data**).

Note that personal data does not include information relating to a legal person (such as a company).

During the course of our relationship (including at proposal stage), we may need to collect, use, store and transfer different kinds of personal data about you, which we have grouped together:

- i. **Standard personal data** (for example, information which we use to identify you and enter into a relationship with you and to manage that relationship);
- ii. **Special categories of personal data.** This mainly applies where we have been engaged to provide you with accident or sickness insurance (whether directly by yourself or where you have been included in a group policy procured by another person), and for which cases we may need to process certain health information relating to you in order to be able to administer and provide you with your requested coverage or deal with your claims.

STANDARD PERSONAL INFORMATION

The data subcategories listed below pertain to ‘Standard Personal Data’:

- **Identity Data** includes your first name, maiden name (where applicable), surname, title, address, marital status, date of birth, age, gender, sex, nationality, identity card and/or passport number;
- **Coverage Data** includes, in respect of each policy which you hold with us, details about (i) the risks insured; (ii) the type of cover provided; (iii) the amount covered and payment date; (iv) the beneficiaries named under that policy; (v) our quotation; (vi) your disclosures pursuant to that policy; (vii) your application made with us; and (viii) duration of the cover, including its start date and end date.
- **Beneficiary Data** includes identity data about the beneficiaries named or included in your policy;
- **Usage Data** includes information about how you use our products and services or Website.

We may also additionally request and receive from the intermediary handling your file / policy:

- **Contact Data** includes your residential address, email address and telephone and/or mobile number;
- **Employment Data** includes your occupation and current and previous employment information, such as your employer, place and type of work, salary and, where applicable, any health and safety risks relevant to your work;
- **Financial Data** includes your bank account number and details (including IBAN), payment history with us and the invoices which have been issued to you;
- **Claims Data** includes details about any claims which you make with us, including the date of that claim, amount of compensation requested, file and interview notes, your claim declaration, related correspondence, our decision and the reasons for our decision and (where applicable) details on any payouts made by us under that claim.

SPECIAL CATEGORIES OF PERSONAL DATA

As mentioned earlier, we may also collect health data about Policyholders and Beneficiaries who have engaged us to provide them with accident or sickness insurance coverage. We may need to process this type of sensitive personal data (i.e., ‘health data’) as part of our business operations and requirements, including for underwriting, complaints and claims handling purposes and in order to be able to issue, administer and provide their requested insurance cover.

More generally, we may also need to process special categories of personal data about our applicants / customers in order to satisfy our legal obligations or for reasons of substantial public interest, such as to prevent insurance fraud.

This will primarily involve health data, as outlined below.

Health Data: this applies where you have engaged or requested us to provide you with insurance coverage for accident and/or sickness and comprises information about your current and previous physical health, including details of any physical or medical conditions which you may be currently suffering from or may have suffered in the past.

We will generally receive or extract such health-related data about you from the relevant intermediary handling your policy or file using the below sources:

- applications which you have filled in and submitted for our insurance products / services;
- any disclosures which you make in connection with an application, proposal form or a policy;
- your claims history;
- any medical reports requested or submitted in connection with a claim which you have made;
- notes and reports about your history and any treatment or care which you have received or need in connection with a claim made with under a policy which you hold with us;
- records of medical services which you have received; and/or
- referrals provided from your existing or previous insurance provider.

It may also be recorded in any (i) quotes which we may have directly or indirectly issued to you and/or (ii) communications exchanged with you (including by the intermediary) in relation to claims, complaints or incidents.

We will only collect and process your Health Data in limited circumstances, namely **where necessary for an insurance or ‘business of insurance’ activity purpose**, primarily being to determine (together with the relevant intermediary) whether we can provide you with the requested accident or sickness cover and under what terms or conditions, to advise on, arrange, provide or manage the insurance policy which you hold with us, or to verify, investigate and deal with a claim made under that policy in accordance with our applicable terms of business, or relating to rights and responsibilities arising under or in connection with that health policy or at law.

In these circumstances, our processing may be based on any or all of the following lawful bases:

- the provision of health / social care or treatment or management of health / social care systems and services;
- to protect the vital interests of the insured (e.g., emergencies);
- for the establishment, exercise, or defence of legal claims (e.g., policy claims);
- substantial public interest (accident/sickness insurance coverage);
- other derogations introduced under applicable national law in terms of Article 9(4) of the GDPR, such the provisions and conditions of the Processing of Data Concerning Health for Insurance Purposes Regulations (Subsidiary Legislation 586.10 of the laws of Malta) (the “**Insurance Regulations (Malta)**”).

Otherwise, if we cannot rely on another lawful basis, we will limit our processing of your Health Data to where we’ve obtained your **explicit consent**. For instance, we may also ask you to authorise your doctor or healthcare provider to supply necessary information to support a proposal or claim which you have made with us.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data about you by law, or pursuant to our terms of business and/or service requirements, and you fail to provide that data when requested or object to its processing, we may not be able to perform or conclude the insurance contract which we have or are trying to enter into with you and may no longer be able to provide you with our products or services. This also applies where you omit any information which we request in our application or proposal forms or fail to provide us with certain required disclosures.

In certain instances, we may even need to exercise our prerogative to terminate our contract with you and withdraw the provision of our products and services to you.

We will however notify you if this is the case at that point in time.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

The personal data that we process about you, as listed above, is collected and generated from a variety of sources, in accordance with applicable laws and regulations, as follows:

- i. **through interactions with us.** This includes personal data which you provide when you:
 - lodge, submit or forward any claims;
 - report issues;
- ii. **through the submission of forms and documents,** such as when you provide us with or include your personal data in any applications, declarations, claims, complaints, forms, questionnaires or other documents which you make or submit to us (including any customer disclosures);
- iii. **in the course of managing and administering our relationship with you.** This might include your claims or cover history, and records of any interactions or communications exchanged with you.

In view of how we operate, we also collect such information from third party sources, including notably:

- insurance intermediaries involved in the arrangement of your policy (**which will commonly be the case**);
- the main member, if you have been named or added as a beneficiary under that member’s policy;
- your employer, if you are covered by a group insurance plan sponsored or taken out by your employer;
- any family member or other individual acting on your behalf;
- other third parties whom we work with in connection with your policy and/or claims, including actuaries, auditors, legal advisors, reinsurers, tax advisors, regulators, data protection supervisory authorities, healthcare professional and other medical assistance providers.

5. HOW WE USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely upon to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data pursuant to more than one lawful ground or basis, depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p><u>Application and Contract Performance</u></p> <p>(a) to determine whether to enter into a customer relationship with you and, if yes, to enter into that relationship;</p> <p>(b) to issue, execute and implement the insurance cover, <i>i.e</i> to provide you / the named beneficiaries with the requested products or services.</p>	<p><i>Generally:</i></p> <p>(a) Identity;</p> <p>(b) Beneficiary;</p> <p>(c) Coverage;</p> <p><i>We may supplement these with one or more of the below categories:</i></p>	<p>(a) Performance of a contract with you;</p> <p>(b) Necessary to comply with a legal obligation;</p> <p>(c) Necessary for our legitimate interests:</p> <ul style="list-style-type: none"> • to determine whether we want to enter into a relationship with you, • to verify your ability to meet financial

	<p>(a) Contact</p> <p>(b) Employment;</p> <p>(c) Financial;</p> <p>(d) Claims;</p> <p>(e) Health (for accident / sickness).</p>	<p>commitments;</p> <ul style="list-style-type: none"> to assess whether the requested cover can be granted (including underwriting); <p>(d) Processing is necessary for reasons of substantial public interest (detection, prevention and suppression of fraud); and</p> <p>(e) in the case of Health Data, based on:</p> <ul style="list-style-type: none"> substantial public interest (accident/sickness insurance coverage); reliance on a condition or ground provided for under applicable national law, such as the Insurance Regulations (Malta) and reasons of substantial public interest; it being necessary to establish, exercise or defend legal claims (for example, claims made against us under a policy); in the case of an emergency, to protect your vital interest; the provision of health / social care or treatment or management of health / social care systems and services; or failing any of the above, then your explicit consent.
<p><u>Insurance Fraud and Due Diligence Processes</u></p> <p>(b) To fulfil our due diligence and KYC internal compliance policies and requirements;</p> <p>(c) To fulfil any external mandatory reporting obligations that we may have to the local and overseas public and regulatory authorities or law enforcement agencies (including to the MFSA or the FIAU).</p>	<p><i>Generally:</i></p> <p>(a) Identity;</p> <p>(b) Beneficiary;</p> <p>(c) Coverage;</p> <p><i>We may supplement these with one or more of the below categories:</i></p> <p>(a) Contact</p> <p>(b) Employment;</p> <p>(c) Financial;</p> <p>(d) Claims.</p>	<p>(a) Necessary to comply with a legal obligation (mandated reporting).</p> <p>(b) Necessary for our legitimate interests, including to verify the identity of applicants and to protect against fraud (to the extent that a legal obligation does not apply to us); and</p> <p>(c) Processing is necessary for reasons of substantial public interest (particularly for the detection, prevention, reporting and suppression of fraud, including insurance fraud).</p>

<p><u>Contract Administration</u></p> <p>Including:</p> <p>(a) quotation;</p> <p>(b) underwriting;</p> <p>(c) policy administration;</p> <p>(d) claims handling;</p> <p>(e) direct claims settlement;</p> <p>(e) renewals;</p> <p>(f) premium adjustments;</p> <p>(g) payouts;</p> <p>(h) manage premiums, payments and fees; and</p> <p>(i) claims file administration.</p>	<p>Generally:</p> <p>(a) Identity;</p> <p>(b) Beneficiary;</p> <p>(c) Coverage.</p> <p><i>We may supplement these with one or more of the below categories:</i></p> <p>(a) Contact</p> <p>(b) Employment;</p> <p>(c) Financial;</p> <p>(d) Claims;</p> <p>(e) Health (for accident / sickness).</p>	<p>(a) Performance of a contract with you;</p> <p>(b) Necessary to comply with a legal obligation;</p> <p>(c) Necessary for our legitimate interests:</p> <ul style="list-style-type: none"> • to make sure that claims are handled efficiently and to investigate complaints, • to make sure that the information used to handle your claim or complaint is accurate; • to collect insurance premiums; • identify and limit outstanding payments due; <p>(d) in the case of Health Data, based on:</p> <ul style="list-style-type: none"> • substantial public interest (accident/sickness insurance coverage); • reliance on a condition or ground provided for under applicable national law, such as the Insurance Regulations (Malta) and reasons of substantial public interest; • it being necessary to establish, exercise or defend legal claims (for example, claims made against us under a policy); • the provision of health / social care or treatment or management of health / social care systems and services; or • failing any of the above, then your explicit consent.
<p><u>Billing and Record-Keeping</u></p> <p>(a) For legal, tax and accounting purposes (e.g. reporting to tax & regulatory authorities, and accounting record requirements);</p> <p>(b) To collect and recover debts owed to us (debt recovery); and</p>	<p>Generally:</p> <p>(a) Identity;</p> <p>(b) Beneficiary;</p> <p>(c) Coverage.</p>	<p>(a) Performance of a contract with you.</p> <p>(b) Necessary to comply with a legal obligation (namely, accounting and other record-keeping requirements).</p> <p>(c) Necessary for our legitimate interests (to enforce our rights and recover debts due to us).</p>

<p>(c) For billing, invoice and internal record keeping requirements.</p>	<p><i>We may supplement these with one or more of the below categories:</i></p> <p>(a) Contact (b) Employment; (c) Financial; (d) Claims.</p>	
<p><u>Relationship management</u></p> <p>(a) To keep our records up to date, including in relation to your policy, renewals and claims;</p> <p>(b) To ensure that you have received a product or service for which you are covered in accordance with the terms of the applicable policy;</p> <p>(c) To maintain records of our products and services provided to you and our interactions with you;</p> <p>(d) To perform material control and ensure that you have been provided with the best possible treatment or service from us;</p> <p>(e) To respond to any queries or complaints we may receive from you and to seek to resolve these;</p> <p>(f) To notify you of any changes to our terms or policies.</p>	<p><i>Generally:</i></p> <p>(a) Identity; (b) Beneficiary; (c) Coverage.</p> <p><i>We may supplement these with one or more of the below categories:</i></p> <p>(a) Contact (b) Employment; (c) Financial; (d) Claims; (e) Health (for accident / sickness).</p>	<p>(a) Performance of a contract with you;</p> <p>(b) Necessary to comply with a legal obligation;</p> <p>(c) in the case of Health Data, based on:</p> <ul style="list-style-type: none"> • substantial public interest (accident/sickness insurance coverage); • reliance on a condition or ground provided for under applicable national law, such as the Insurance Regulations (Malta) and reasons of substantial public interest; • it being necessary to establish, exercise or defend legal claims (for example, claims made against us under a policy); • in the case of an emergency, to protect your vital interest; • the provision of health / social care or treatment or management of health / social care systems and services; or • failing any of the above, then your explicit consent.
<p><u>Legal Claims and Enforcement</u></p> <p>To permit COWEN to exercise its rights or pursue any remedies available to it (including under or in connection with a policy), and to limit any damages or losses which we may sustain.</p>	<p>All Data</p>	<p>Necessary to establish, exercise or defend legal claims.</p>

Please contact us at dpo@cowen-insurance.com if you need further details, or even if you simply wish to enquire about the specific lawful basis we are relying on to process your personal data where more than one lawful basis has been set out in the table below.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose, or we are obliged to process your data by applicable laws or court or regulatory orders.

6. DISCLOSURES OF YOUR PERSONAL DATA

We will ensure that your personal data is processed in a manner that is compatible with the purposes indicated above at **Section 5**. For those stated purposes, we may have to disclose or share your personal data, including your submitted forms, with the parties set out below, each of whom operate as joint or independent controllers.

- **intermediaries** whom we have appointed to act as a broker, agent or distributor for us and to sell or issue our products and services to you. Together with the relevant intermediary, we will generally process your personal data under a joint controller relationship, as will be set out and described in your insurance policy.

A joint controller relationship is one where two or more controllers (in this case, Cowen and the relevant intermediary) jointly determine the purposes and means for processing a person's personal data. **Please consult your insurance policy for further details on this arrangement and how it affects you.**

- **our reinsurers**, whom we have appointed to reinsure and mitigate our risks;
- **the policyholder** if you are a member or a beneficiary under a policy taken out by that holder;
- **your employer (or their broker)** for coverage, premium or renewal administration purposes if you are a member or beneficiary under an insurance scheme or plan taken out with us by your employer;
- **healthcare professionals, healthcare providers and clinicians** used to assess or support your application accident or sickness insurance coverage from us or any claims which you make under any such policy;
- **employers or representatives**: if you receive a discount on your premium because you are part of a collective insurance, we use your personal data to periodically check with your employer or representative to see whether you are still entitled to this discount;
- **our professional advisors**, e.g. our auditors, actuaries, insurance managers, financial advisers and legal counsel;
- **debt recovery agencies** who assist us with the recovery of debts owed to us;
- **to regulators, government bodies and tax authorities**, when required by applicable laws;
- **to any relevant party, claimant, law enforcement agency or court**, to the extent necessary for the establishment, exercise or defence of legal claims or for the purposes of prevention, investigation, detection or prosecution of criminal offences in accordance with applicable law and regulation; and
- **third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets** (successors in title). Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, the new owners may use your personal data in the same way as set out in this Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

As indicated, we may also disclose your data if we are under a duty to disclose or share your personal data to comply with any legal obligation, judgment or under an order from a court, tribunal or authority. We may also transfer your personal data when we are required to do so by any judicial body, court order or order issued by a police authority.

We may also disclose your data to enforce our contractual terms with you or your entity, or to protect our rights, property, or safety, that of our partners or other applicants or investors. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

7. INTERNATIONAL TRANSFERS

As we deal with many international organisations and use global information systems in connection with our business or to provide our products and services, we may need to from time to time transfer your personal data to outside the European Economic Area (“EEA”) (*i.e.* the EU Member States plus Norway, Liechtenstein, and Iceland). Moreover, we also conduct business in the United Kingdom, which is now considered a non-EU country.

We will only transfer your data to the extent necessary for the purposes stated in this Notice, including to: (i) provide our products or services to you; (ii) fulfil our contractual obligations to you or exercise our contractual obligations against you; (iii) comply with our legal or regulatory obligations or (iv) assert, exercise or defend a legal claim.

Where we do need to transfer your personal data outside the EEA (whether for these purposes or any other purpose listed in **Section 5**), we will ensure a similar degree of protection is afforded to that personal data by ensuring at least one of the following safeguards applies or is otherwise implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission (such as the United Kingdom); or
- In the absence of an adequacy decision, we will use standard contractual clauses that have been approved by the European Commission.

Please contact our DPO at dpo@cowen-insurance.com if you want further information on this,

8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed (**safeguard its integrity and confidentiality**). We also regularly review and, where practicable, improve upon these security measures. We limit access to your personal data to those employees who ‘need-to-know’ such information, as based on their respective work duties with us.

Additionally, we have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. DATA RETENTION

How long will you use my personal data for?

Please note that we consider our relationship with customers to be an ongoing and continuous relationship, until terminated by either party.

To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it (i.e. the issuance of the requested quotation and subsequently, if our quotation is taken up by yourself, the performance of our contract with you, including for any obligations assumed or owed to your named beneficiaries) and **thereafter**:

- to satisfy any legal, accounting, tax, regulatory or reporting obligations to which we may be subject;
- to comply with any accounting, taxation, regulatory and/or recording-keeping obligations to which we may be subject; and/or
- to be able to assert, exercise or defend possible legal claims against or otherwise relating to or otherwise involving you or your policy, i.e. prescriptive periods or statutes of limitations.

In most cases, we apply the following retention periods:

- a **five (5) year period** for quotations that are issued but not accepted or taken up (starting from the end of the relative quotation validity date); and
- a **ten (10) year period** for insurance policies which are issued and entered into (starting from the closure of all outstanding policy claims or termination / expiry of the insurance policy, whichever comes last).

This is save for cases where we may need to retain your personal data for longer period(s), such as in relation to threatened or commenced claims, disputes, or litigation, ongoing or pending investigations, requests made by competent authorities or pursuant to applicable laws, including record-keeping requirements.

Kindly contact us at dpo@cowen-insurance.com for further details about the retention periods that we apply.

10. YOUR LEGAL RIGHTS

Under certain circumstances, data protection laws grant you certain rights in relation to your personal data.

- *Request access to your personal data.*
- *Request correction (**rectification**) of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact our **DPO** at dpo@cowen-insurance.com.

KINDLY NOTE that none of these data subject rights are absolute or unreservedly guaranteed, but must generally be weighed against our own legal obligations and legitimate interests. If a decision is taken to override your request, you will be informed of this by our DPO along with the reasons for our decision.

No fee is usually charged

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may simply refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed or revealed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within a period of one month from the date of receiving your request. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

YOU HAVE THE RIGHT TO

i. REQUEST ACCESS

You have the right to **request access** to your personal data (commonly known as a “*data subject access request*”). This enables you to request information as to whether or not your personal data is being processed by us, and to also request a copy of the information that we hold about you (to check, for instance, that we are processing it lawfully).

You may send an email to dpo@cowen-insurance.com requesting information as the personal data which we process. Generally, you shall receive one copy free of charge via email of the personal data which is undergoing processing. Any further copies of the information processed will typically incur a charge of **€10.00**.

You are only entitled to request access to personal data that **relates to you**.

ii. RIGHT TO INFORMATION

You have the **right to information** when collecting and processing personal data about you from publicly accessible or third-party sources. When this takes place, we will inform you, within a reasonable and practicable timeframe, about the third party or publicly accessible source from whom we have collected your personal data.

iii. REQUEST CORRECTION (RECTIFICATION)

You have the right to **request correction or rectification** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected and/or updated, though we may need to verify the accuracy of the new data you provide to us. As mentioned, it is in your interest to keep us informed of any changes or updates to your personal data which may occur during the course of your business relationship with us.

iv. REQUEST ERASURE

You have the right to **request erasure** of your personal data.

This enables you to ask us to delete or remove personal information where:

- there is no good reason for us continuing to process it;
- you have successfully exercised your right to object to processing (see below);
- we may have processed your information unlawfully; or
- we are required to erase your personal data to comply with local law.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. These may include instances where the retention of your personal data is necessary to:

- comply with a legal or regulatory obligation to which we are subject; or
- establish, exercise or defend a legal claim (including policy claims).

v. **OBJECT TO PROCESSING**

You have the right to **object to processing** of your personal data where we are relying on a legitimate interest or those of a third party, and there is something about your particular situation that makes you want to object to that processing as you feel that it impacts on your fundamental rights and freedoms. Please refer to the table set out in **Section 5** to understand those situations where we rely on a legitimate interest in order to process your personal data.

In such cases, we will cease processing your personal data for the ‘objected purposes’, unless we can demonstrate compelling legitimate grounds for such processing which override your interests, rights and freedoms of the data subject, or for the establishment to exercise or defend legal claims.

vi. **RESTRICTION OF PROCESSING**

You have the right to **request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data’s accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold onto the data even if we no longer require it, as you need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data, but we need to verify whether we have overriding legitimate grounds to use it.

vii. **DATA PORTABILITY**

You have the right to **request the transfer (data portability)** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

viii. **WITHDRAWAL OF CONSENT**

You may **withdraw your consent at any time** where we are relying on consent to process your personal data. This will **not** however affect the lawfulness of any processing which we carried out before you withdrew your consent. Any processing activities that are not based on your consent will remain unaffected. Once we have been made aware that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

11. **CHANGES TO THIS NOTICE**

This Notice may be updated from time to time, including to reflect any business developments or any legal or regulatory developments which take place or affect our business or industry sector.

The latest version of the Notice is available at www.cowen.com/regulatory-disclosures and is also available upon request from our DPO. If you have any questions regarding this Notice, or if you would like to send us your comments, please contact us today or alternatively write to us using the Contact Details indicated in this Notice.