

DATA PRIVACY NOTICE

Your privacy is very important to us. This privacy notice (“Privacy Notice”) is provided by Berkshire Hathaway International Insurance Limited, registered office at 4th Floor The St. Botolph Building, 138 Houndsditch, London, EC3A 7AW, United Kingdom, including its registered branches within the UK, Italy¹ and Switzerland (“BHIL”) in accordance with applicable data protection laws including but not limited to the Data Protection Act 2018, the General Data Protection Regulation and the Data (Use & Access) Act 2025; in the case of our Swiss Branch, the Federal Act on Data Protection (for simplicity we will refer to these collectively as “GDPR”).

References to “we”, “our” and “us” in this Privacy Notice are references to BHIL. References to “you” or “your” refers to the individual whose personal data is being processed by BHIL (you may be the insured, beneficiary, claimant or other person involved in a claim or relevant to the insurance policy).

1. DATA CONTROLLER

A data controller is the natural or legal person, public authority, agency or other body which determines the purposes and means of the processing of personal data. BHIL is the Data Controller as defined by the data protection laws.

2. WHAT IS THE PURPOSE OF THIS PRIVACY NOTICE

In order to provide certain insurance products and services (including providing insurance quotes, insurance policies, and/or dealing with any claims or complaints), BHIL may collect information about you which constitutes personal data under the GDPR. This Privacy Notice explains how we collect, use, share and protect your personal data. Please read this Privacy Notice carefully to understand what we do with your personal data.

This Privacy Notice is available at www.bhiil.com and may be changed from time to time as required.

3. PERSONAL DATA WE MAY COLLECT ABOUT YOU

The types of personal we collect may include:

Types of Personal Data	Details
Individual details:	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, academic and professional information, family details, including their relationship to you.
Identification details:	Identification numbers issued by government bodies or agencies, including your national insurance number or, passport number, tax identification number and driving licence number.
Financial information:	Bank account or payment card details, income or other financial information.
Risk details:	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to your health, criminal convictions, or other special categories of personal data . For certain types of policy, this could also include telematics data.
Policy information:	Information about the quotes you receive and policies you take out.
Credit and Anti-Fraud Data:	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you.

¹ For privacy information relating to BHIL’s Italian Branch (BH-Italia), refer to https://bh-italia.com/Documenti_sito/GDPR/Informativa_Privacy.pdf

Types of Personal Data	Details
Previous and current claims:	Information about previous and current claims, (including other unrelated insurances) which may include data relating to you health, criminal convictions, or other special categories of personal data and in some cases, surveillance reports.
Telephone records:	Recordings of telephone calls to our representatives and call centres.
Photographs and video recordings:	Images or video recordings created in connection with our insurance or other business activities, including for claims assessment, administration, and settlement, claim disputes, or for other relevant purposes as permitted by law.
Special categories of personal data:	Certain categories of personal data which have additional protection under the GDPR. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation.

You do not have to provide us with any personal information, however, should **you** be unable to provide us with the required personal data, **we** will be unable to provide **you** with a quote, insurance or process a claim that **you** make.

4. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

We might collect your personal data from various sources, including:

- **you;**
- **your** family members, employer or representative;
- other insurance market participants;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies such as the DVLA and HMRC;
- open electoral register; or
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjusters, solicitors, and claims handlers

Which of the above sources apply will depend on **your** particular circumstances.

5. THE PURPOSES, CATEGORIES AND LEGAL GROUNDS FOR OUR PROCESSING OF YOUR PERSONAL DATA.

Data protection law says that **we** are only allowed to use personal information if **we** have a proper reason for doing so. This includes when **we** share it outside BHIL. Data protection law says **we** must have one or more of the following reasons:

- **To fulfil a contract we have with you,**
- **When it is our legal duty,**
- **When it is in our legitimate interest,**
- **When we need to establish, exercise or defend legal claims,**
- **When you consent to it.**

We set out below the purposes and legal basis for which we may process your personal data during the lifecycle of providing insurance products and services to you.

Purpose	Categories of Data	Our Reasons
Quotation /Policy Inception		
<ul style="list-style-type: none"> ▪ Setting you up as a client including possible fraud, sanctions and anti-money laundering checks ▪ Evaluating the risks to covered and matching to appropriate policy /premium ▪ Payment of premium where the insured/policyholder is an individual 	<ul style="list-style-type: none"> ▪ Individual details ▪ Identification details ▪ Financial Information ▪ Policy Information ▪ Risk details ▪ Previous claims ▪ Credit and anti-fraud data 	<ul style="list-style-type: none"> ▪ Contractual performance ▪ Legal obligation
Policy Administration		
<ul style="list-style-type: none"> ▪ Client care and including communication with you and sending updates ▪ Payments to and from individuals 	<ul style="list-style-type: none"> ▪ Individual details ▪ Policy information ▪ Risk details ▪ Previous claims ▪ Current claims 	<ul style="list-style-type: none"> ▪ Contractual performance ▪ Substantial Public Interest
Claims Processing		
<ul style="list-style-type: none"> ▪ Managing insurance and reinsurance claims ▪ Defending or prosecuting legal claims ▪ Investigating or prosecuting fraud 	<ul style="list-style-type: none"> ▪ Individual details ▪ Policy information ▪ Risk details ▪ Previous claims ▪ Current claims ▪ Health data ▪ Criminal records data ▪ Other sensitive data 	<ul style="list-style-type: none"> ▪ Contractual performance ▪ Legal obligation ▪ Legal claims ▪ Substantial public interest
Renewals		
<ul style="list-style-type: none"> ▪ Contacting the insured/policyholder to renew the insurance policy ▪ Evaluating the risks to be covered and matching to appropriate policy/premium ▪ Payment of premium where the insured /policyholder is an individual 	<ul style="list-style-type: none"> ▪ Individual details ▪ Policy information ▪ Risk details ▪ Previous claims ▪ Current claims 	<ul style="list-style-type: none"> ▪ Contractual performance ▪ Substantial Public Interest ▪ Legal obligation
Throughout the insurance lifecycle		
<ul style="list-style-type: none"> ▪ Complying with our legal and regulatory obligations ▪ Pricing and risk modelling ▪ Handling complaints ▪ Transferring books of business, company sales and reorganisations 	<ul style="list-style-type: none"> ▪ Individual details ▪ Policy information ▪ Identification details ▪ Current claims ▪ Previous claims ▪ Financial Information ▪ Risk details 	<ul style="list-style-type: none"> ▪ Contractual performance ▪ Legal Obligation ▪ Substantial Public Interest
Maintain quality of processes & security		
<ul style="list-style-type: none"> ▪ Improve quality of our products & services ▪ Provide staff training ▪ Maintain information security ▪ Manage business operations ▪ Manage IT infrastructure 	<ul style="list-style-type: none"> ▪ Individual details ▪ Policy information ▪ Identification details ▪ Previous & current claims ▪ Risk details 	<ul style="list-style-type: none"> ▪ Contractual performance ▪ Legal Obligation ▪ Legitimate interest
Business Partners		
<ul style="list-style-type: none"> ▪ Manage relationships ▪ Administer contracts ▪ Marketing ▪ Events 	<ul style="list-style-type: none"> ▪ Individual details 	<ul style="list-style-type: none"> ▪ Contractual performance ▪ Consent ▪ Legitimate interest

6. WHO WE MAY SHARE YOUR PERSONAL DATA WITH

In order to undertake the activities listed above it may be necessary to share **your** data with third parties. Who **we** share this data with may depend on the insurance products and services we provide to **you** but may include:

Type of third party	Details
Affiliate entities in the Berkshire Hathaway group	<ul style="list-style-type: none"> BHIL is part of the Berkshire Hathaway group of insurance companies. We may share your personal data with affiliated underwriting and services companies for administrative, reporting and accounting purposes including Berkshire Hathaway European Insurance DAC, Berkshire Hathaway Specialty Insurance Company, National Indemnity Company, Resolute Management Limited, Resolute Management Services Limited, The Medical Protective Company, MedPro Group Inc.
Other insurance and insurance distribution parties	<ul style="list-style-type: none"> Where permitted by applicable law, we may share personal data with other third parties, for example, other insurers, reinsurers, insurance and reinsurance brokers, other intermediaries, and agents, appointed representatives, distributors, affinity marketing partners and financial institutions, securities firms and other business partners. You can find out more information about how the insurance industry uses personal data at the following web address: https://img.london/wp-content/uploads/2019/07/LMA-Insurance-Market-Information-Uses-Notice-post-enactment-31-05-2018.pdf
Our service providers	<ul style="list-style-type: none"> External service providers, such as commercial and credit information companies, claims management, loss adjusters, accountants, actuaries, auditors, experts, lawyers and other professional advisors or experts. Support teams and IT services providers and other third-party vendors and outsourced service providers that assist us in carrying out business activities.
Government authorities and public authorities or bodies	<ul style="list-style-type: none"> We may disclose personal data to government or other public authorities (including, but not limited to, workers' compensation boards, courts, regulatory bodies, law enforcement agencies, tax authorities and criminal investigations agencies), and to bodies which we have a legal obligation to disclose information.
Other third parties	<ul style="list-style-type: none"> If necessary for purpose respecting regulatory and legal framework.

7. INTERNATIONAL TRANSFERS

We may need to transfer **your** data to insurance market participants or their affiliates or sub-contractors and BHIL group affiliates which are located outside of the UK or European Economic Area (EEA) where data privacy laws may not be the same as they are in the UK/EEA. Those transfers are undertaken with the required data protection law safeguards in place.

8. YOUR RIGHTS

As set forth by the applicable data protection legislation, **you** have the right to:

- Be informed of what personal data (if any) we hold about you;
- Be informed about how we use **your** personal data;
- Exercise the rights below under certain conditions:

Type of Right	Details
Right of access to personal data	<ul style="list-style-type: none"> You have the right to receive a copy of the personal data we hold about you and information about how we use it.
Right to rectification of personal data	<ul style="list-style-type: none"> You have the right to ask us to correct personal data we hold about you where it is incorrect or incomplete.

Type of Right	Details
Right to data portability	<ul style="list-style-type: none"> This right allows you to obtain your personal data in a format which enables you to transfer that personal data to another organisation. However, this right only applies in certain circumstances.
Right to erasure of personal data	<ul style="list-style-type: none"> Under certain circumstances, such as when you have revoked your previously given consent and there is no other legal basis available for us to process your personal data, you may request to have your personal data erased.
Right to restrict and object processing of personal data	<ul style="list-style-type: none"> You have the right to request that we suspend our use of your personal data. However, this right only applies in certain circumstances. Where we suspend our use of your personal data, we will still be permitted to store your personal data, but any other use of this information while our use is suspended will require your consent, subject to certain exemptions.
Rights relating to automated decision making and profiling	<ul style="list-style-type: none"> You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you. However, this right only applies in certain circumstances.
Right to withdraw consent to processing of personal data	<ul style="list-style-type: none"> Where we have relied upon your consent to process your personal data, you have the right to withdraw that consent.
Right to complain to the relevant data protection authority	<ul style="list-style-type: none"> You are welcome to contact us with any enquiries and complaints that you may have regarding the processing of your personal data. You also have the right to lodge complaints pertaining to the processing of your personal data to the local or European data protection authority.

In certain circumstances, we may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

If you have any questions in relation to **our** use of **your** personal data or would like further information about the safeguards we have in place for international transfers, **you** can contact the Head of Compliance at BHIL by email using the following details: DPO@bhil.com.

If you are not satisfied with **our** use of **your** personal data or **our** response to any request by **you** to exercise any of **your** rights, or if **you** think that **we** have breached the GDPR, then **you** have the right to complain to the Data Protection Authority. Please see below for contact details:

- The Information Commissioner's Office in the United Kingdom: <https://ico.org.uk/make-a-complaint/>.
- The Garante Per La Protezione dei dati Personali in Italy: <https://www.garanteprivacy.it/home/diritti/come-agire-per-tutelare-i-tuoi-dati-personali>
- The Federal Data Protection and Information Commissioner in Switzerland: <https://www.edoeb.admin.ch/en/reporting-portals>

9. PROFILING AND AUTOMATED DECISION MAKING

We provide services where we sometimes use automated decision-making. Automated decision-making is an important part of effective management. If the result of an automated decision affects **you** to a significant degree, **you** have the right in some cases not to be subjected to automated processing alone. This means that in some cases **you** have the right to demand manual treatment.

Type of automated decision-making	Description
When calculating price	<ul style="list-style-type: none"> ▪ When calculating insurance premiums, insurance market participants may compare your personal data against industry averages. Your personal data may also be used to create the industry averages going forward. This is known as profiling and is used to ensure premiums reflect risk.
In order to prevent and detect insurance fraud	<ul style="list-style-type: none"> ▪ Profiling may also be used by us to assess information you provide to protect against fraud. We use certain analytical methods for monitoring claims. Profiling may be used to identify potential fraud cases. In the profiling, personal data such as social security number, address, telephone number and network analyses may appear. It may also include data from third parties.

As a result, **we** carry out checks on certain claims. Cases are automatically selected but sent to review for manual processing by an investigator.

10. RETENTION OF YOUR PERSONAL DATA

We will keep **your** personal data only for so long as is necessary and for the purpose for which it was originally collected complying with legal requirements.

11. COOKIES

BHIL uses cookies and similar tracking technologies solely to ensure a smooth and functional user experience. Cookies are small text files consisting of letters and numbers, sent from BHIL's web servers and stored on your device for a limited time. The cookies we use are essential for the website to function properly and to improve the services we provide. These cookies do not collect any personal data and are not used for marketing purposes. They are strictly necessary to enable core website features.