

## PRIVACY NOTICE FOR POLICYHOLDERS

BUILDERS DIRECT SA (**BUILDERS**) is part of the Builders Insurance Holdings Group. BUILDERS has instituted a comprehensive data protection compliance framework, in line with the Data Protection legislation, in order to fulfil its responsibilities and ensure adequate protection of the personal data of all the individuals it enters into a relationship.

- 1.1 **PERSONAL DATA PROCESSING.** BUILDERS collects and processes personal data on you when you take out an insurance policy or a third-party takes out an insurance policy for which you are an insured party. BUILDERS acts as the controller of such processing and is committed to respecting your privacy and protecting your personal data in accordance with the law, in particular the EU General Data Protection Regulation 2016/679 (**GDPR**).
- 1.2 **PROCESSING PURPOSES.** The processing of your data is based on the following grounds:

PURPOSE OF PROCESSING	GDPR LEGAL BASIS
<p>BUILDERS processes your data:</p> <ul style="list-style-type: none"> <li>- to decide whether or not to enter into or maintain a business relationship with you,</li> </ul>	<p>The processing is necessary:</p> <ul style="list-style-type: none"> <li>- in order to take steps prior to entering into a contract with you, and for purposes of legitimate interests pursued by BUILDERS,</li> </ul>
<ul style="list-style-type: none"> <li>- to manage insurance policies, underwriting, claims and payments,</li> </ul>	<ul style="list-style-type: none"> <li>- for the performance of a contract with you, and to comply with legal obligations to which BUILDERS is subject,</li> </ul>
<ul style="list-style-type: none"> <li>- for accounting and administrative management purposes,</li> </ul>	
<ul style="list-style-type: none"> <li>- to determine, invoice and recover premiums and sums due,</li> </ul>	
<ul style="list-style-type: none"> <li>- to evaluate and manage risks, fight against fraud, manage disputes and litigation, and</li> </ul>	<ul style="list-style-type: none"> <li>- for purposes of legitimate interests pursued by BUILDERS,</li> </ul>
<ul style="list-style-type: none"> <li>- to better know you as required by law (in particular with respect to anti-money laundering rules).</li> </ul>	<ul style="list-style-type: none"> <li>- to comply with legal obligations to which BUILDERS is subject.</li> </ul>

In exceptional cases, BUILDERS may need your consent for certain processing operations. In such case, BUILDERS will ask for your consent separately.

- 1.3 **DATA CATEGORIES.** In addition to the information you have communicated to BUILDERS directly or through our insurance intermediary or your broker, BUILDERS may collect and process the following categories of personal data on you and other insurance beneficiaries:
- a. personal identification data (including passport/ID) and contact details,
  - b. insurance policies, premiums, payments and claims details,
  - c. customer due diligence data and reports,
  - d. information on insurance claims, including damage to property, liabilities, and health data (only for claims management purposes),
  - e. information on dispute and litigation management.

If you provide personal data on third-party insured persons (whether beneficiaries, other insured persons, your relatives, employees or anyone else) to BUILDERS or our insurance intermediary or your broker, you should make sure you have informed them accordingly.

**DATA RECIPIENTS.** BUILDERS may share your data with other entities of the BUILDERS group, third-party partners/providers, including: insurance and reinsurance companies,

intermediaries, brokers, actuaries, auditors, advisors, consultants, lawyers, banks, counterparties and third parties involved in claims (including witnesses and experts), competent courts, authorities and adverse parties, as necessary to perform operations and deliver services to you and, where required by law, with competent local regulators and authorities.

- 1.4 DATA TRANSFERS OUTSIDE THE EU/EEA. BUILDERS does not transfer your personal data outside the EU/EEA for its own internal purposes. However, if an insured person or property is located, or insurance claims or related dispute/litigation take place, outside the EU/EEA, BUILDERS may transfer your data to the relevant jurisdiction, including to countries which do not have a similar level of protection of personal data as the EU. In such an event, and in accordance with GDPR, data transfers will:
  - a. be limited to what is necessary to perform the contract with you, or conclude a contract with a third-party in your interest, or
  - b. be justified by the establishment, exercise or defence of legal claims, or
  - c. if appropriate, be covered by appropriate safeguards, such as entering into EC approved standard contractual clauses, or
  - d. in exceptional cases, with your consent. In such cases, BUILDERS will ask for your consent separately.
- 1.5 DATA RETENTION. BUILDERS will retain your personal data for as long as required to deliver the services you have requested, and then for the mandatory retention duration set forth by applicable law (which can vary between 10 and 40 years).
- 1.6 YOUR STATUTORY RIGHTS. You have certain rights concerning your personal data under GDPR as mentioned below, and can exercise them by contacting BUILDERS' Data Protection Officer at [[dpo@builders.lu](mailto:dpo@builders.lu)].
  - a. **Right to information.** If you are an insured party and not the policyholder, BUILDERS may not have your current details and thus cannot contact you conveniently and in confidentiality. You can find updated information on BUILDERS' processing of your data at any time on this website <http://buildersre.lu/>, or by contacting BUILDERS' Data Protection Officer at [[dpo@builders.lu](mailto:dpo@builders.lu)].
  - b. **Access right.** You have the right to get access to your personal data.
  - c. **Right to rectification.** You can ask BUILDERS to rectify, correct or update inaccurate and/or incorrect data.
  - d. **Other rights.** In certain limited cases (in which case BUILDERS will first analyse whether the conditions for the exercise of such rights are fulfilled, in line with GDPR), you may object to, or request the limitation of, the processing of your personal data, or request the erasure or portability of your personal data. Where you have given your consent to specific processing, you have the right to withdraw such consent (for future processing). You should note that the law authorizes BUILDERS to retain and continue processing certain personal data, even if you have exercised your rights to object or ask for erasure or -if applicable- withdraw your consent: this is the case in particular where BUILDERS has legitimate and compelling reasons for continuing the processing, such as compliance with applicable law. Finally, you can contact the Luxembourg data protection authority (*Commission nationale pour la protection des données* - <https://cnpd.public.lu/en.html>) to lodge a complaint.
- 1.7 DATA PROTECTION OFFICER. BUILDERS has appointed a data protection officer, who can be contacted at [[dpo@builders.lu](mailto:dpo@builders.lu)].