



# Privacy Policy



**UIB Nordic AB (referred to in this Policy as “UIBN”) is committed to protecting the privacy and security of the personal information that we process in connection with the services we provide to our clients. This privacy notice describes how we may collect and use personal information about you. Please be aware that the types of data collected by UIB Nordic AB in Sweden, may be different to the types of data collected by our UK branch, UIB Nordic UK.**

## 1) About Us

In this privacy policy, references to “we” or “us” or “UIB Nordic AB” or “UIBN” are references to UIB Nordic AB, including its UK branch, UIB Nordic UK..

UIBN is a privately owned independent international insurance and reinsurance broker. In order to arrange insurance cover and assist our clients with their insurance claims, UIBN need to use and share personal information. This makes us a “data controller” for any personal information you provide to us and this means that we must comply with data protection laws. This privacy policy describes how we may collect and use your personal information.

If you have any questions about this privacy policy please contact our respective Data Protection Representative using the details set out in section 8.

## 2) Our processing of your personal information

Our relationship with you and the type of services we provide to you will dictate the nature of personal information that we collect and use about you and the ways in which we use your personal information.

To arrange insurance cover, UIBN and other participants in the insurance industry are required to use and share personal data. The examples set out below are instances where the insurance industry is required to use and share personal data, please see the below headings.

- Obtaining information about your insurance needs;
- Carry out due diligence about your company, including possible fraud, sanctions, credit and anti-money laundering checks;
- Evaluating the risks to be covered and obtaining quotes from the appropriate (re)insurers;
- Managing insurance and reinsurance claims;
- Contacting the person in charge of your insurance at your company to renew the insurance policy;
- General client care, including communicating with you and sending you updates;
- Complying with our legal or regulatory obligations;
- Transferring books of business, company sales and reorganisations.

When we provide our services, we will sometimes ask for or receive special categories of personal information. There will be limited circumstances when UIBN will use such information, for example UIBN may collect information relating to your health to assess and process your claim under a corporate health insurance policy and in certain circumstances we will also collect details about criminal convictions, for example when you apply for motor fleet cover we will ask if the individuals who will benefit from the cover have any previous motor convictions.

Where you provide personal information to us about other individuals we will also be a data controller of their personal information. You should refer them to this privacy policy before supplying us with their information on their behalf.

In order to make this privacy policy as user friendly as possible, we have split it into different sections depending on our relationship with you. Please click on the section below that is applicable to you and that describes the relationship you have with us.

## **Read through your applicable section and then return to section 3**

### **2.1) Beneficiaries of a corporate insurance policy**

### **2.2) Prospective and existing policyholders**

### **2.3) Third Party Claimants/Witnesses**

### **2.4) Business Contacts**

### **2.5) Third Party Suppliers**

## **3) What marketing activities do we carry out**

We will use your personal information to provide you with information about, and invite you to, events that we have organised, such as corporate golf days, seminars and lectures. We may also contact you to explore new business opportunities.

If you wish to opt out of this marketing, you may do so by responding to any marketing email communication confirming that you would like to opt out. Otherwise, you can always contact us using the details set out in section 8 to update your contact preferences.

## **4) How long do we keep personal information for?**

We will keep your personal information for as long as reasonably necessary to fulfil the purposes set out in section 2 above and to comply with our legal and regulatory obligations. The exact time period will depend on your relationship with us and the type of personal information we hold about you, for example:

- If we have provided you with a quote for an insurance policy which you have not taken up, we will only keep your personal information for a maximum of 2 years from the date of the quote.
- If you are a policyholder or beneficiary under a corporate policy, we will keep your personal information for the entirety of the life of the insurance policy at a minimum and will then consider any additional factors as referred to below.

When determining how long to retain your personal information, we will also take into consideration a number of factors, including whether there are any existing contractual obligations we may owe you or you may owe us, and whether there are anticipated or actual disputes, complaints or legal proceedings.

If you would like further information regarding the periods for which your personal information will be stored, please contact us using the details set out in section 8.

## 5) What is our approach to sending your personal information overseas?

We may sometimes transfer your personal information to countries outside of the European Economic Area ("EEA") or for clients of UIB Nordic UK the United Kingdom ("UK"), for the processing purposes outlined in this Policy, such as when we transfer information to third party suppliers who are based outside the EEA, or when third parties who act on our behalf transfer your personal information to countries outside the EEA.

When such a transfer takes place we take appropriate safeguarding measures to ensure that your personal information is adequately protected. We do so in a number of ways, including:

- transferring personal data to countries outside the UK which the Information Commissioner's Office, the UK data protection regulator ("ICO") has ruled have adequate levels of protection for personal information. You can find out more about this here;
- entering into data transfer contracts and using specific contractual provisions that have been approved by the ICO, otherwise known as standard contractual clauses.

If you would like further information regarding our data transfers and the steps we take to safeguard your personal information, please contact us using the details set out in section 8.

## 6) How do we protect your information?

We require our external service providers and other UIB group companies to take appropriate security measures to protect any of your personal information we transfer to them. We do not permit our external service providers to use your personal data for their own purposes. We only let them process your personal data for specified purposes, and as we tell them. Any personal information we gather about you will not be passed on to any third party or organisation except in the instances outlined above in section 2.

If you receive something suspicious, please report it to our data protection representative using the details set out in section 8.

## 7) Your rights

Under data protection laws you have a number of rights in relation to the personal information that we hold about you, which we describe below. These rights might not apply in every circumstance. You can exercise your rights by contacting us at any time using the details in section 8. We will not usually charge you to respond to such a request.

Please note that although we take your rights seriously, there may be some circumstances where we cannot comply with your request, such as where complying with it would mean that we could not comply with our own legal or regulatory requirements. In these instances we will let you know why we cannot comply with your request.

### The right to access your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it.

We will usually provide your personal information to you in writing unless you request otherwise. Where your request has been made electronically (e.g. by email), a copy of your personal information will be provided to you by electronic means where possible.

Where you would like to do so, you can submit requests by email to [uibndpr@uibn.co.uk](mailto:uibndpr@uibn.co.uk). or by contacting us using the details in section 8.

## The right to rectification

We always take care to make sure that the information we hold about you is accurate and, where necessary, up to date. If you believe that there are any inaccuracies, discrepancies or gaps in the information we hold about you, you can contact us and ask us to update or amend it.

## The right to restrict processing

In certain circumstances you may ask us to stop using your personal information, for example where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to use your personal information.

## The right to withdraw your consent

Where we rely on your consent in order to process your personal information, you have the right to withdraw your consent to further use of your personal information.

## The right to erasure

This is sometimes known as the right to be forgotten. It entitles you, in certain circumstances, to request us to delete your personal information. For example, where we no longer need your personal information for the original purpose we collected it, or where you have exercised your right to withdraw consent.

Whilst we will assess every request, there are other factors that we need to take into account. For example, we may be unable to erase your information as you have requested because we have a regulatory obligation to keep it.

## The right to object to direct marketing

You have control over the extent to which we market to you and you have the right to request that we stop sending you marketing messages at any time. You can do this by contacting us using the details set out in section 8.

Please note that even if you exercise this right because you do not want to receive marketing messages, we may still send you service related communications where necessary.

## The right to object to processing

In certain cases you have the right to object to our processing. This arises in relation to where we process your personal information based on our legitimate business interests. Where we do so, you can object to the processing, unless our purpose outweighs any prejudice to your privacy rights.

## The right to data portability

In certain circumstances you can request that we transfer personal information that you have provided to us to a third party.

## Rights relating to automated decision-making

We do not carry out any automated decision making. If this changes in the future, we will provide you with an updated notice setting out our decision making process.

## The right to make a complaint to the Regulator

For client of UIB Nordic AB

You have a right to complain to Datainspektionen, the Swedish Authority for Privacy Protection or any superseding local Data Protection Regulator if you believe that we have breached data protection laws when using your personal information.

You can visit the Datainspektionen's website at [www.imy.se](http://www.imy.se) for more information. Lodging a complaint will not affect any other legal rights or remedies that you have.

For clients of UIB Nordic UK

You have a right to complain to the Information Commissioner's Office (ICO) or any other local Data Protection Regulator if you believe that we have breached data protection laws when using your personal information.

You can visit the ICO's website at <https://ico.org.uk/> for more information. Lodging a complaint will not affect any other legal rights or remedies that you have.

## 8) Contacting us

If you would like further information about any of the matters in this notice, or if you have any other questions about how we collect, store or use your personal information, please contact our Data Protection Representative by emailing [uibndpr@uibn.co.uk](mailto:uibndpr@uibn.co.uk), or telephoning us on +44 (0)20 7488 0551.

## 9) Updates to this notice

From time to time we may need to make changes to this notice, for example, as the result of changes to law, technologies, or other developments. We will provide you with the most up-to-date notice and you can check our website here periodically to view it.

This notice was last updated on 09 September 2021

## 2.1) Beneficiaries of a corporate insurance policy

This section will detail what personal information we collect about you and use if you are a named beneficiary under a corporate insurance policy.

### What personal information will we collect?

- Your name, date of birth, title and gender.
- Contact information, including telephone number, postal address and email address.
- Financial information such as your bank details and salary information.
- ID documents such as your passport.
- Any information about you contained in a death certificate, legal report or police report which have been provided to us for claim purposes.
- Information about your job, such as your job title, salary, CV and employment contract.

### What special categories of personal information will we collect?

Information about your physical and mental health, and in particular any information contained in a medical report, if relevant to an insurance policy (of which you are a beneficiary) or to a claim you are making. Depending on the type of insurance policy you are a beneficiary of and if relevant to the cover and/or any claim made, we will also process any details about criminal convictions you have, for example any previous motor convictions you have if you are a beneficiary of a corporate motor fleet policy.

### How will we collect your personal information?

We will collect information directly from you when:

- you provide information to us when making a claim;
- you contact us to make a complaint; and
- you contact us by email or telephone, and when making any other written or verbal communication.

As well as obtaining information directly from you, we will also collect information from:

- medical experts and other experts if there is a claim;
- publically available information e.g. electoral register, sanctions lists;
- the policyholder (corporate entity); and
- other insurance market participants, such as local retail broker that engages with UIBN to place your policy in the European market.

## What will we use your personal information for?

We may use your personal information for a number of different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we process your personal information:

- Where we have a legal or regulatory obligation to use your personal information. For example, our regulator requires us to maintain records of all dealings with you.
- Where we need to use your personal information for a legitimate business need (e.g. to keep business records, to administer a claim and to keep records of the corporate policy taken out and all beneficiaries). When using your personal information for these purposes, we will always assess our need to use your personal information for these purposes against your right to privacy to ensure that we are protecting your rights.

When we use your special categories of personal information, we need to have an additional legal ground. We will rely on the following legal grounds when we process special categories of your personal information:

- As a beneficiary of a corporate policy, we have an insurance purpose (to arrange cover and/or handle and administer claims) and a substantial public interest to use your special categories of personal information.
- We need to use such special categories of personal information to establish, exercise or defend legal rights, such as when we are facing legal proceedings or want to bring legal proceedings ourselves or when we need to respond to regulatory investigations.

Purpose for processing	Legal ground for using your personal information	Legal ground for using your special categories of personal information
To assess the risk and arrange an insurance policy with appropriate cover, from which you are to benefit	<ul style="list-style-type: none"> <li>• We have a legitimate business need (to use your personal information to make a full assessment of the insurance risk and to arrange an insurance policy with appropriate cover).</li> </ul>	It is necessary for the insurance purpose of administering an insurance policy.
<p>To provide claim processing services. For UIB Nordic AB this involves assisting the client file for a claim and representing the client in discussions with the relevant parties.</p> <p>For UIB Nordic UK this involves assessing and handling any claims made and arranging for settlement of a claim.</p>	<ul style="list-style-type: none"> <li>• We have a legitimate business need (to use your information to investigate claims, respond and handle any claims).</li> </ul>	It is necessary for the insurance purpose of administering and handling claims under an insurance policy.
To comply with our legal or regulatory obligations and to respond to regulatory requirements.	<ul style="list-style-type: none"> <li>• We have a legal obligation.</li> </ul>	We need to use your information in order to establish, exercise or defend legal rights.



To apply for and claim on our own insurance.	<ul style="list-style-type: none"> <li>We have a legitimate business purpose need (to have our own insurance cover in place).</li> </ul>	None
Communicating with you and responding to any enquiries you have	<ul style="list-style-type: none"> <li>We have a legitimate business need (to manage customer relationships and respond to any enquiries)</li> </ul>	It is necessary for the insurance purpose of administering and handling claims under an insurance policy.
Managing business operations such as maintaining and keeping records, complying with internal audit requirements and receiving professional advice (such as accountants, tax advisers and legal advisers)	<ul style="list-style-type: none"> <li>We have a legitimate business need (to manage our own everyday business operations)</li> </ul>	<ul style="list-style-type: none"> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> <li>It is necessary for the insurance purpose of administering and handling claims under an insurance policy.</li> </ul>

### Whom do we share your personal information with?

We will keep your personal information confidential and will only share it where necessary for the purposes set out above with the following parties:

- Other third parties involved in an insurance process such as insurers, brokers and reinsurers.
- Other third parties involved in the administration of handling claims such as lawyers, claims handlers, third party claimants, witnesses, loss adjusters and experts.
- Regulatory bodies including the Finansinspektionen and the Financial Conduct Authority.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Our insurers.
- Third parties including self-employed contractors with whom we have entered into contractual arrangements to provide services we need in order to carry out our everyday business activities such as business administration, document management providers, IT suppliers, auditors, lawyers, outsourced business process management providers, our subcontractors and tax advisers.

### [Return to section 3](#)

## 2.2) Prospective and existing policyholders

This section will detail what personal information we collect about you and use if you have taken out or requested a quote for a UIBN insurance policy in your own name, for example where you are a sole trader or director requiring D&O insurance.

### What personal information will we collect?

- Your name, date of birth, title and gender.
- Contact information, including telephone number, postal address and email address.
- Financial information such as your bank details and salary information.
- ID documents such as your passport.
- Any information about you contained in a death certificate, legal report or police report which have been provided to us for claim purposes.
- Information about your job, such as your job title, salary, CV and employment contract.
- Any information relevant to the insurance policy we are placing/have placed and/or any claims made under the policy.
- Information obtained from requests for mid-term adjustments which may provide additional information about changes in your personal circumstances.

## What special categories of personal information will we collect?

Information about your physical and mental health, and in particular any information contained in a medical report, if relevant to your insurance policy or to a claim you are making. Depending on the type of your insurance policy and if relevant to the cover and/or any claim made, we will also process any details about any criminal convictions you have.

## How will we collect your personal information?

We will collect information directly from you when:

- you provide information to us when requesting a quote/making a claim/arranging renewal of your policy submitted via application forms, proposal forms or requests for mid-term adjustments;
- you contact us to make a complaint; and
- you contact us by email or telephone, and when making any other written or verbal communication.

As well as obtaining information directly from you, we will also collect information from:

- medical experts and other experts if there is a claim;
- publically available information e.g. electoral register, sanctions lists; and
- other insurance market participants, such as local retail broker that engages with UIBN to place your policy in the European market.

## What will we use your personal information for?

We may use your personal information for a number of different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we process your personal information:

- Where we have a legal or regulatory obligation to use your personal information. For example, our regulator requires us to maintain records of all dealings with you.
- We need to use your personal information to enter into or perform our contract with you. For example, we need to use your personal information to arrange and place appropriate insurance cover.
- Where we need to use your personal information for a legitimate business need (e.g. to keep business records, to administer a claim and to keep records of the policy taken out and all beneficiaries). When using your personal information for these purposes, we will always assess our need to use your personal information for these purposes against your right to privacy to ensure that we are protecting your rights.

When we use your special categories of personal information we need to have an additional legal ground. We will rely on the following legal ground when we process special categories of your personal information:

- As a prospective or existing policyholder, we have an insurance purpose (to arrange cover and/or handle and administer claims) and a substantial public interest to use your special categories of personal information.
- We need to use such special categories of personal information to establish, exercise or defend legal rights, such as when we are facing legal proceedings or want to bring legal proceedings ourselves or when we need to respond to regulatory investigations.

Purpose for processing	Legal ground for using your personal information	Legal ground for using your special categories of personal information
To evaluate your insurance needs and assess the risk, obtain quotes for you and, where the quote is accepted, to arrange an insurance policy with appropriate cover	<ul style="list-style-type: none"> <li>We have a legitimate business need (to use your personal information to allow insurers to make a full assessment of the insurance risk and to arrange an insurance policy with appropriate cover).</li> <li>It is necessary to enter into/perform our contract with you.</li> </ul>	It is necessary for the insurance purpose of entering into an insurance contract.
<p>To provide claim processing services. For UIB Nordic AB this involves assisting the client file for a claim and representing the client in discussions with the relevant parties</p> <p>For UIB Nordic UK this involves assessing and handling any claims made and arranging for settlement of a claim.</p>	<ul style="list-style-type: none"> <li>We have a legitimate business need (to use your information to investigate claims, respond and handle any claims).</li> <li>It is necessary to enter into/perform our contract with you.</li> </ul>	It is necessary for the insurance purpose of administering and handling claims under an insurance policy.
To assist with any renewals, mid-term adjustments and cancellation of your insurance policy	<ul style="list-style-type: none"> <li>We have a legitimate business need (to make any required amendments to your insurance policies to ensure they are appropriate to your needs and circumstances).</li> <li>It is necessary to enter into/perform our contract with you.</li> </ul>	It is necessary for the insurance purpose of administering an insurance policy.
To comply with our legal or regulatory obligations or to respond to regulatory requirements.	<ul style="list-style-type: none"> <li>We have a legal obligation.</li> </ul>	<ul style="list-style-type: none"> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>
To apply for and claim on our own insurance.	<ul style="list-style-type: none"> <li>We have a legitimate business need (to have our own insurance cover in place).</li> </ul>	None
Communicating with you and responding to any enquiries you have	<ul style="list-style-type: none"> <li>It is necessary to enter into/perform our contract with you.</li> <li>We have a legitimate business need (to manage customer relationships and respond to any enquiries)</li> </ul>	It is necessary for the insurance purpose of administering, and handling claims under, an insurance policy.
Managing business operations such as maintaining and keeping records, complying with internal audit requirements and receiving professional advice (such as accountants, tax advisers and legal advisers)	<ul style="list-style-type: none"> <li>It is necessary to enter into/perform our contract with you.</li> <li>We have a legitimate business need (to manage our own everyday business operations)</li> </ul>	<ul style="list-style-type: none"> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> <li>It is necessary for the insurance purpose of administering, and handling claims under, an insurance policy.</li> </ul>

## Whom do we share your personal information with?

We will keep your personal information confidential and will only share it where necessary for the purposes set out above with the following parties:

- Other third parties involved in an insurance process such as insurers, brokers and reinsurers.
- Other third parties involved in the administration of handling claims such as lawyers, claims handlers, third party claimants, witnesses, loss adjusters and experts.
- Regulatory bodies including the Finansinspektionen and the Financial Conduct Authority.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Our insurers.
- Third parties including self-employed contractors with whom we have entered into contractual arrangements to provide services we need in order to carry out our everyday business activities such as business administration, document management providers, IT suppliers, auditors, lawyers, outsourced business process management providers, our subcontractors and tax advisers.

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### 2.3) Third Party Claimants/Witnesses

This section details what personal information we collect about you and use if you make a claim against a third party who has an insurance policy with a client of ours, or if you are a witness to an incident which has now become the subject of a claim.

#### What personal information will we collect?

- Your name, date of birth, title and gender.
- Contact information, including telephone number, postal address and email address.
- Financial information such as your bank details, salary information, and hospital invoices you have incurred.
- ID documents such as your passport.
- Any information about you arising out of a claim (if you are a claimant) including information contained in an insured company check, which could include information about individual shareholdings.

#### What special categories of personal information will we collect?

If you are a claimant, information about your physical and mental health if relevant to the claim you are making and in particular any information contained in a medical report.

#### How will we collect your personal information?

We will collect information directly from you when:

- you provide information to us when making a claim;
- you contact us to make a complaint; and
- you contact us by email or telephone, and when making any other written or verbal communication.

As well as obtaining information directly from you, we will also collect information from:

- medical experts and other experts (where you are a claimant); and
- the policyholder (corporate entity); and
- other insurance market participants, such as local retail broker that engages with UIBN to place your policy in the European market.

## What will we use your personal information for?

We may use your personal information for a number of different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we process your “personal information”:

- When we have a legal or regulatory obligation to use your personal information. For example, our regulator requires us to maintain records of all dealings with you.
- When we need to use your personal information for a legitimate business need (e.g. to keep business records and to administer a claim). When using your personal information for these purposes we will always assess our need to use your personal information for these purposes against your right to privacy to ensure that we are protecting your rights.

When we use special categories of your personal information we need to have an additional legal ground. We will rely on the following legal grounds when we process your special categories of personal information:

- We have an insurance purpose (to handle and administer claims) and substantial public interest to use your special categories of personal information.
- We need to use such special categories of personal information to establish, exercise or defend legal rights, such as when we are facing legal proceedings or want to bring legal proceedings ourselves, or when we need to respond to regulatory investigations.
- We have your explicit consent.

Purpose for processing	Legal ground for using your personal information	Legal ground for using your special categories of personal information
To provide claim processing services.. For UIB Nordic AB this involves assisting the client file for a claim and representing the client in discussions with the relevant parties. For UIB Nordic UK this	<ul style="list-style-type: none"> <li>• We have a legitimate business need (to use your information to investigate claims, respond and handle any claims).</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the insurance purpose of handling claims under an insurance policy.</li> <li>• We have your explicit consent</li> </ul>
To comply with our legal or regulatory obligations or to respond to regulatory requirements.	<ul style="list-style-type: none"> <li>• We have a legal obligation.</li> </ul>	We need to use your information in order to establish, exercise or defend legal rights.
To apply for and claim on our own insurance.	<ul style="list-style-type: none"> <li>• We have a legitimate business need (to have our own insurance cover in place).</li> </ul>	None
Communicating with you and responding to any enquiries you have	<ul style="list-style-type: none"> <li>• We have a legitimate business need (to respond to any enquiries)</li> </ul>	It is necessary for the insurance purpose of handling claims under an insurance policy.
Managing business operations such as maintaining and keeping records, complying with internal audit requirements and receiving professional advice (such as accountants, tax advisers and legal advisers)	<ul style="list-style-type: none"> <li>• We have a legitimate business need (to manage our own everyday business operations)</li> </ul>	<ul style="list-style-type: none"> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> <li>• It is necessary for the insurance purpose of handling claims under an insurance policy.</li> </ul>

## Whom do we share your personal information with?

We will keep your personal information confidential and will only share it where necessary for the purposes set out above with the following parties:

- Other third parties involved in an insurance process such as insurers, brokers and reinsurers.
- Other third parties involved in the administration of handling claims such as solicitors, claims handlers, third party claimants, witnesses, loss adjusters and experts.
- Regulatory bodies including the Finansinspektionen and the Financial Conduct Authority.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Our insurers.
- Third parties including self-employed contractors with whom we have entered into contractual arrangements to provide services we need to carry out our everyday business activities such as business administration, document management providers, IT suppliers, auditors, lawyers, outsourced business process management providers, our subcontractors and tax advisers.

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### 2.4) Business Contacts

This section will detail what personal information we collect about you if you are a business contact of ours as a prospective, existing or new client, an insurance market participant or introducer.

### What personal information will we collect?

The extent and nature of personal data that we will collect from you will depend on our relationship with you and what personal information we need to engage/contract with you but can include:

- Your name, address, date of birth, title and country of residence.
- Contact information, including telephone number, postal address and email address.
- Any information obtained about you as part of know your client (KYC) anti-money laundering and other regulatory checks, including details of any legal action, regulatory fine, politically exposed person, specially designated nationals for sanctions purposes or bankruptcy.
- Information about your job title.
- Copy ID documents such as passports and utility bills.
- Bank account details.
- Any information about you contained in an agreement covering our business relationship.
- Any information required to arrange and sponsor your visa for a business visit with us, for example to discuss a new insurance programme or to attend training sessions or seminars we have invited you to.

### What special categories of personal information will we collect?

Whilst we do not actively request any special categories of personal information from you, we do seek answers to due diligence questionnaires and carry out know-your-client (KYC) screening checks on third parties we engage or contract with. This may therefore mean that you may provide (as part of your due diligence responses), or we may receive, special categories of personal information about you, such as information relating to ethnicity (particularly if we are arranging your visa) or details of your criminal convictions.

## How will we collect your personal information?

We will collect your personal information directly from you when:

- you visit our offices;
- you use our website;
- you request information about our services; and
- you contact us by email or telephone, and when making any other written or verbal communication.

We will also collect your personal information from:

- work colleagues of yours;
- third parties we engage to provide KYC screening checks;
- publicly available sources such as Google, your website, LinkedIn and third parties who introduce business to us; and
- other insurance market participants, such as local retail broker that engages with UIBN to place your policy in the European market.

## What will we use your personal information for?

We may use your personal information for a number of different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we process your personal information:

- We need to use your personal information for a legitimate business need (e.g. to keep business records, to maintain business working relationships and to create new business opportunities). When using your personal information for these purposes, we will always assess our need to use your personal information for these purposes against your right to privacy to ensure that we are protecting your rights.
- We have a legal or regulatory obligation to use your personal information. For example, our regulators and governing bodies require us to keep and hold certain records of our dealings with you.
- We need to use your personal information to arrange, enter into or perform a contract with you or a company you work for or on behalf of, for example an introducer agreement or a client agreement.

When we use special categories of your personal information we need to have an additional legal ground. We will rely on the following legal grounds when we process your special categories of personal information:

- We have your explicit consent.
- We need to use such special categories of personal information to establish, exercise or defend legal rights, such as when we are facing legal proceedings, a regulatory investigation, or we want to bring legal proceedings ourselves.

Purpose for processing	Legal ground for using your personal information	Legal ground for using your special categories of personal information
In order to carry out know your client (KYC) and screening checks	<ul style="list-style-type: none"> <li>• We have a relevant legal or regulatory obligation.</li> <li>• It is necessary to enter into or perform our contract with you.</li> <li>• We have a legitimate business need (to develop new business and maintain business relationships and comply with required checks).</li> </ul>	We have your explicit consent

For correspondence and contact purposes, to make commission payments and to maintain business relationships	<ul style="list-style-type: none"> <li>• We have a relevant legal or regulatory obligation.</li> <li>• It is necessary to enter into or perform our contract with you.</li> <li>• We have a legitimate business need (to develop new business and maintain business relationships).</li> </ul>	None
To sponsor and arrange a visa for you to visit our offices in the UK in order to discuss the placement of a new/renewal insurance programme or attend a training session or seminar.	<ul style="list-style-type: none"> <li>• We have a legitimate business need (to develop new business and maintain business relationships).</li> <li>• It is necessary to enter into or perform our contract with you.</li> <li>• We have your consent.</li> </ul>	We have your explicit consent.
Communicating with you and responding to any enquiries you have	<ul style="list-style-type: none"> <li>• We have a legitimate business need (to respond to any enquiries)</li> <li>• It is necessary to enter into or perform our contract with you.</li> </ul>	None
Managing business operations such as maintaining and keeping records, complying with internal audit requirements and receiving professional advice (such as from accountants, tax advisers and legal advisers)	<ul style="list-style-type: none"> <li>• We have a legitimate business need (to manage our own everyday business operations).</li> <li>• It is necessary to enter into or perform our contract with you.</li> </ul>	We need to use your information in order to establish, exercise or defend legal rights.

### Whom do we share your personal information with?

We will keep your personal information confidential and will only share it where necessary for the purposes set out above with the following parties:

- Other insurance market participants, such as local retail broker that engages with UIBN to place your policy in the European market..
- Regulatory bodies including the Finansinspektionen and the Financial Conduct Authority.
- Third party service providers, such as when facilitating your visit to our offices.
- Third parties undertaking KYC/screening checks.
- Third parties we engage to assist with the visa application process.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Our insurers.
- Third parties including self-employed contractors with whom we have entered into contractual arrangements to provide services we need in order to carry out our everyday business activities, such as business administration, document management providers, IT suppliers, auditors, lawyers, outsourced business process management providers, our subcontractors and tax advisers.

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## 2.5) Third Party Suppliers

If you are a sole trader third party supplier, or a contact at one of our corporate third party suppliers, this section details what personal information we collect about you and use.

### What personal information will we collect?

- Your name and contact information, including telephone number and email address.
- Bank account details (so we may make payment to you if you are a sole trader third party supplier).

### What special categories of personal information will we collect?

Whilst we do not actively request any special categories of personal information from you, we do seek answers to due diligence questionnaires and carry out know-your-client (KYC) screening checks on third parties we engage or contract with. This may therefore mean that you may provide (as part of your due diligence responses), or we may receive, special categories of personal information about you, such as details of your criminal convictions.

### How will we collect your personal information?

We will collect information directly from you when:

- you complete documentation such as agreeing to our terms of business with you;
- you visit our offices; or
- you contact us by email or telephone, and when making any other written or verbal communication.

We will also collect your personal information from third parties we engage to provide KYC screening checks.

### What will we use your personal information for?

We use your personal information for a number of different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we process your personal information:

- When we need to use your personal information to enter into or perform the contract that we have with you or your company. For example, as a sole trader third party supplier we need to use your personal information to engage your services.
- When we need to use your personal information for a legitimate business need (e.g. to keep business records and to maintain business working relationships). When using your personal information for these purposes, we will always assess our need to use your personal information for these purposes against your right to privacy to ensure that we are protecting your rights.

When we use special categories of your personal information we need to have an additional legal ground. We will rely on the following legal grounds when we process your special categories of personal information:

- We have your explicit consent.
- We need to use such special categories of personal information to establish, exercise or defend legal rights, such as when we are facing legal proceedings, a regulatory investigation, or we want to bring legal proceedings ourselves.

Purpose for processing	Legal grounds for using your personal information	Legal ground for using your special categories of personal information
To pay you for your services.	<ul style="list-style-type: none"> <li>It is necessary to perform our contract with you.</li> </ul>	None
In order to carry out know your client (KYC) and screening checks	<ul style="list-style-type: none"> <li>It is necessary to enter into or perform our contract with you.</li> <li>We have a legitimate business need (to develop and maintain business relationships and comply with required checks).</li> </ul>	We have your explicit consent.
Managing our business operations, such as maintaining accounting records, communicating with you and maintaining our supplier relationships and complying with internal audit requirements and receiving professional advice (such as from accountants, tax advisers and legal advisers)	<ul style="list-style-type: none"> <li>It is necessary to enter into or perform our contract with you.</li> <li>We have a legitimate business reason (to effectively manage our business operations).</li> </ul>	We need to use your information in order to establish, exercise or defend legal rights.
Communicating with you and responding to any enquiries you have.	<ul style="list-style-type: none"> <li>We have a legitimate business need (to respond to any enquiries).</li> <li>It is necessary to enter into or perform our contract with you.</li> </ul>	None

## Whom will we share your personal information with?

We will keep your personal information confidential and will only share it where necessary for the purposes set out above with the following parties:

- Regulatory bodies including the Finansinspektionen and the Financial Conduct Authority.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Third parties including self-employed contractors with whom we have entered into contractual arrangements to provide services we need to carry out our everyday business activities such as business administration, document management providers, IT suppliers, auditors, lawyers, outsourced business process management providers, our subcontractors and tax advisers.

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