

PRIVACY POLICY

This policy ("Policy") explains how Talbot Risk Services Pte Ltd ("Talbot" or "we") manage, collect, use and protect an individual's personal data in accordance with Singapore's Personal Data Protection Act 2012 ("PDPA").

In this Policy, the term "personal data" follows the definition of the term in the PDPA:

personal data:

data, whether true or not, about an individual who can be identified:

(a) from that data; or

(b) from that data and other information to which Talbot has or is likely to have access.

Why do we collect, hold, use and disclose personal data?

We collect, hold, use and disclose personal data so that we can provide you with products and services including:

- arranging and administering insurance;
- risk analysis and underwriting;
- management of claims including investigation and claims;
- accounting and auditing;
- complaints and disputes management; and
- legal, regulatory and compliance purposes.

What types of personal data do we collect and hold?

We collect and hold personal data from and about individuals insured under or related to insured parties under insurance policies underwritten by Talbot. Depending on the products or services we are providing to you, we may collect and hold the following information from you:

- general identification and contact information, including your name, address, e-mail address, telephone number(s), gender, ethnic background, marital status, family status, date of birth and place of birth; and
- employment status, financial information and account details to enable us to process payments to or from you or your agent.

How do we collect and hold personal data?

Where it is reasonable and practicable to do so, we collect personal data directly from you or from your insurance broker. This data may be collected using various means including in writing, in person, by telephone, by email or through other electronic messages.

We hold your personal data electronically in various internal systems and databases including shared drives, email, document management systems and in hard copy. Systems are in place to ensure personal data is secured within the system, as well as not disclosed to unauthorised third parties. Where personal data has been collected through a third party, they may also hold copies of that information.

We take all reasonable steps in the circumstances to protect the security of personal data from misuse, interference or loss and unauthorised access, modification or disclosure and to destroy or permanently de-identify any personal data after it can no longer be used or is no longer required for legal or regulatory or our business purposes.

Consequences of withdrawing consent to the collection, use and disclosure of personal data

You may refuse or withdraw your consent from us to collect, use or disclose your personal data by giving us reasonable notice. This can be done at any time and as long as there are no legal or operational restrictions preventing you from doing so.

It is important to note that in the event you do withdraw consent, we will be unable to collect, use, or disclose your personal data and therefore we will also not be able to continue to provide you with our product or services.

To what other organisations do we disclose personal data?

We may disclose your personal data to others we believe are necessary to assist us in providing the relevant services, such as other Talbot entities, contractors or third parties including loss adjusters and reinsurers. We may also disclose your personal data to others where we are required or authorised by law to do so or where we are otherwise permitted to disclose the information under the PDPA.

We limit the use and disclosure of any personal data provided by us to them to the specific purpose for which we supplied it.

International disclosure of personal data

In some circumstances and for the purposes set out above, we may disclose personal data to parties located in other countries, including countries that have a different data protection regime than is found in Singapore. These countries include the United Kingdom and Australia.

How do you access and correct your personal data?

We take reasonable steps to ensure that your personal data is accurate, complete and up-to-date.

You can request access to the personal data we may hold about you at any time, as well as request to know how it has been or may have been used and disclosed for the last 12 months to the extent your right is allowed by law.

You also have the right to request correction of the personal data by contacting our Singapore Data Protection Officer (please see the contact details below).

In order to process any request for access or correction of personal data, we may need to obtain a minimum level of information from an individual including full name, date of birth and details of the request, including supporting information, evidencing the individual's right to access the data as well as the reason for the data request.

If you are seeking access to or correction of personal data on another person's behalf, we will also require written authorisation from that individual.

We reserve the right to refuse access or correction to personal data under the grounds permitted by the PDPA. We may levy an administrative fee to facilitate your request for access or correction.

How do you make a complaint or enquiry about how we handle your personal data?

If you believe that we have not complied with the PDPA in relation to your personal data, you can contact our Singapore Data Protection Officer by sending an email to privacysingapore@talbotuw.com. Please ensure you state your:

- Full Name
- Contact Number
- Preferred Email Address
- Details of the nature of your complaint and/or query

You will then be contacted within 30 days by our Singapore Data Protection Officer. Please note that you may be charged an administrative fee depending upon the nature of your request or enquiry.

Updates to the Policy

Our Privacy Policy may change from time to time and where this occurs, the updated Privacy Policy will be posted to our home webpage (<http://www.validusholdings.com/insurance/asia-pacific>).