

PRIVACY NOTICES OUTSOURCERS (INCLUDING INTERMEDIARIES), CONSULTANTS

BUILDERS INSURANCE HOLDINGS (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.

This document provides information about the way all the entities of the BUILDERS group treats personal data of its outsourcer, insurance intermediary and consultants.

- 1.1 **PERSONAL DATA PROCESSING.** The BUILDERS entity to which you provide services or are in business with (**BUILDERS**) collects and processes personal data on you. 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
BUILDERS processes your data: <ul style="list-style-type: none"> - for purposes of usual supplier/business partner management (including orders, deliveries, transactions, payments, remuneration or commissions), - for risk management, compliance and due diligence purposes, for on-boarding ongoing monitoring, (including fit & proper or background checks where relevant), - in the context of the service evaluation (notably on the quality of service, SLA monitoring, global efficiency or profitability), - for accounting tasks and legal documentation. 	The processing is necessary: <ul style="list-style-type: none"> - for the performance of a contract with you, to comply with legal obligations to which BUILDERS is subject and for purposes of legitimate interests pursued by BUILDERS.

- 1.3 **DATA CATEGORIES.** BUILDERS may collect from you and process the following categories of personal data for legal representative and/or directors of the outsourcer, insurance intermediary or consultant: personal identification data (name, birth date), public identification data (passport data, ID card), professional information (job title) and legal data (criminal record, where applicable, declaration of honour).
- 1.4 **DATA RECIPIENTS.** BUILDERS may share your data with other entities of the BUILDERS group, third-party partners/providers (including insurance companies, auditors, advisors, consultants, lawyers, banks) and, where required by law, with competent local regulators and authorities.
- 1.5 **DATA TRANSFERS OUTSIDE THE EU/EEA.** BUILDERS does not transfer your personal data outside the EU/EEA for its own internal purposes. However, should this happen in the future and in accordance with GDPR, such 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.
- 1.6 DATA RETENTION. BUILDERS will retain your personal data for as long as required by applicable law (typically, 2 months for criminal records and 10 years for other documentation).
- 1.7 YOUR STATUTORY RIGHTS. You have certain rights concerning your personal data under GDPR as mentioned below, and can exercise them by contacting BUILDERS's Data Protection Officer at [dpo@builders.lu].
- a. **Right to information.** You can find updated information on BUILDERS's processing of your data at any time on the website of the BUILDERS, or by contacting BUILDERS's Data Protection Officer at [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. You should note that the law authorizes BUILDERS to retain and continue processing certain personal data, even where 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.
- 1.8 DATA PROTECTION OFFICER. BUILDERS has appointed a data protection officer, who can be contacted at [dpo@builders.lu].