

CLIENT PRIVACY NOTICE

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Client Privacy Notice

This Privacy Notice covers the information practices of Antes Insurance Brokers Limited ("Antes", "us" "we", "our", and "ours") which is a wholly owned subsidiary of Argus Group Holdings (Europe) Limited ("AGHEL"), and ultimately owned by its parent company, Allshores Limited (together with all related subsidiaries and affiliates, referred to as the "Group"). Antes (registered number: C 10536) is a data controller whose registered office is at Trident Park, No. BA Level 5, Notabile Gardens, Mdina Road, Central Business District Zone 2, Birkirkara, Malta, CBD 2010. In certain cases, and for the purposes of performing some services, Antes and its client ("you", "your") may have agreed that Antes is a processor. When Antes acts as a processor, we comply with the obligations set out in the agreement concluded with you.

Antes is an insurance broker, enrolled and regulated by the Malta Financial Services Authority, in terms of the Insurance Distribution Act (Chapter 487 of the Laws of Malta). More information about Antes can be found at: antes.mt.

This Privacy Notice sets out how we collect and process your Personal Data. This Privacy Notice also provides certain information that is legally required and lists your rights in relation to your Personal Data.

This Privacy Notice relates to personal information that identifies you as a natural person (whether you are an actual or potential customer, an individual who browses our website or an individual outside our organization with whom we interact). We refer to this information throughout this Privacy Notice as "Personal Data" and further details of what this includes are set out in this Privacy Notice below.

OUR SERVICES

The privacy and security of your Personal Data is very important to us so we want to assure you that your information will be properly managed and protected by us at all times. This Privacy Notice is to be read carefully as it explains how we may collect and use your Personal Data.

Our services consist primarily of risk consulting and insurance broking, including administration of claims. To arrange insurance cover and handle insurance claims, we, along with other participants in the insurance industry, are required to use and share Personal Data. During the insurance lifecycle we will receive Personal Data relating to you as a potential or actual policyholder; your family members; beneficiaries under a policy; claimants, and other parties involved in a claim. Therefore, references to "individuals" in this Privacy Notice include any natural living person from the preceding list, whose Personal Data we may receive in connection with the services we provide under our engagements with you.

This Privacy Notice sets out our use of this Personal Data and the disclosures it makes to other insurance market participants and other third parties.

DATA PROTECTION LEGISLATION

The most relevant data protection legislation in Malta is the General Data Protection Regulation ((EU) 2016/679) ("GDPR"), the Data Protection Act (Chapter 586 of the Laws of Malta), and any and all national laws and subsidiary legislation applicable in Malta relating to the processing of Personal Data, as introduced, amended, or updated from time to time (hereinafter referred to as the "Data Protection Legislation").

Data Protection Legislation states that we are allowed to use your Personal Data only if we have a proper reason to do so. Accordingly, we must have one or more of the following reasons:

- **to fulfil a contract that we have with you:** its use is necessary in relation to a service or a contract that you have entered into or because you have asked for something to be done so you can enter into a contract with us;
- **when it is in our legitimate interest:** we may process your information when we have a business or commercial reason to use your information. However, even where it is in our legitimate interest to do so, it must not unfairly prejudice your interests or fundamental rights and freedoms;
- **when it is our legal duty:** when you apply for a product or service (and throughout your relationship with us) we are required by law to collect and process certain personal information about you;
- when you have **consented** to the use of your data (including sensitive data) in a specific way;
- where we need to protect your **vital interests** or those of another person; and
- where it is required in the **public interest** or for **official purposes**.

PERSONAL DATA THAT WE PROCESS

We collect and process various categories of Personal Data at the start of and for the duration of your relationship with us. We may collect and process one or more of the following Personal Data:

Individual details - including your name, address (and proof of address), other contact details (e.g., email and telephone details), gender, marital status, family details (such as dependents), date and place of birth, employment details, relationship to the policyholder, insured, beneficiary or claimant.

Identification details - identification numbers issued by government bodies or agencies (depending on the country you are in, e.g., social security or national insurance number, passport number, ID number, tax identification number, driver's license number).

Financial information - including payment card number, bank account number, and account details, income, and other financial information such as source of wealth and source of funds.

Insured risk - information about the insured risk, which contains Personal Data and may include, only to the extent relevant to the risk being insured:

- **Health data** - current or former physical or mental medical conditions, health status, injury or disability information, medical procedures performed, relevant personal habits (e.g., smoking or consumption of

alcohol), prescription information, medical history;

- **Criminal records data** - relating to criminal convictions, including driving offences; and
- **Other Special Categories of Personal Data** - including racial or ethnic origin, genetic data, biometric data.

Policy information - information about the quotes you receive and the policies you obtain.

Credit and anti-fraud data - credit history and credit score, information about fraud convictions, allegations of crimes and sanctions details received from various anti-fraud and sanctions databases, or regulators or law enforcement agencies.

Previous and current claims - information about previous and current claims, which may include health data, criminal records data, and other Special Categories of Personal Data (as described in the Insured Risk definition above).

Marketing - whether or not you have consented to receive marketing data from us.

Website and communication usage - details of your visits to our websites and information collected through cookies and other tracking technologies, including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

Personal Data does not include data where the identity has been removed (anonymous data).

We also collect, use, and share aggregated data, such as statistical or demographic data, for any purpose in line with our regulatory and legal obligations. Aggregated data may be derived from the individual's Personal Data but is not considered as personal data at law since this data does not directly or indirectly reveal the individual's identity. However, if we combine or connect aggregated data with the individual's Personal Data so that it would be able to directly or indirectly identify the individual, we would treat the combined data as Personal Data which will be processed in accordance with this Privacy Notice.

Where we collect such information directly from individuals, we will inform them of whether the information is required and the consequences of not providing it on the relevant form.

SOURCES OF PERSONAL DATA

We collect and receive Personal Data from various sources, including from (depending on the service provided and country you are in):

- Individuals and their family members, online or by telephone, from emails and/or other written correspondence;
- Individuals' employers or trade or professional associations of which they are a member;
- In the event of a claim, third parties including the other party to the claim (claimant/defendant), witnesses, experts (including medical experts), loss adjusters, lawyers and claims handlers;
- Other insurance market participants, such as insurers, reinsurers, and other intermediaries;

- Credit reference agencies (to the extent we are taking any credit risk);
- Anti-fraud databases and other third party databases, including sanctions lists;
- Government agencies, such as vehicle registration authorities and tax authorities;
- Proposal forms and fact-finding questionnaires;
- Insurance claim forms;
- Open electoral registers and other publicly available information;
- Business information and research tools;
- Third parties who introduce business to us and;
- Customer surveys, forms completed through our website and your interactions with our website (please also see our Cookie Notice).

HOW WE USE AND DISCLOSE YOUR PERSONAL DATA

In this section, we set out the purposes for which we use Personal Data, explain how we share the Personal Data, and identify the 'legal grounds' on which we rely to process the Personal Data. Personal Data is only allowed to be processed when such processing is done lawfully as per the Data Protection Legislation.

The legal grounds set out in the Data Protection Legislation are the following:

Personal Data will be:

- processed lawfully, fairly and in a transparent way;
- collected only for specified and legitimate purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- adequate, relevant, and limited to what is necessary in relation to the purposes we have told you about;
- accurate and kept up to date;
- not kept in a form which permits your identification for longer than necessary and kept only as long as necessary for the purposes we have told you about;
- kept secure.

Please note that in addition to the disclosures identified in the Schedule, we will share the individual's Personal Data in accordance with the purposes stipulated in this Privacy Notice, and in line with our regulatory and legal obligations, to service providers, contractors, advisers, agents, and Group companies that perform activities on our behalf.

We set out in the Schedule the purposes for which we might use your Personal Data and explain how we share the information and identify the legal grounds on which we rely to process the information in the Schedule to this Notice.

CONSENT

In order to facilitate the provision of insurance cover and administer insurance claims, unless another legal ground applies, we rely on your explicit consent for the processing of Special Categories of Personal Data as set out in the Schedule. This consent allows us to be able to provide the services you request and share the

information with other insurers, intermediaries, and reinsurers that need to process the information in order to undertake their role in the insurance market (which in turn allows for the pooling and pricing of risk in a sustainable manner).

Where you are providing us with information about a person other than yourself, you agree to notify them of our use of their Personal Data and to obtain such consent for us.

SAFEGUARDS

We implement physical, electronic, and procedural safeguards appropriate to the sensitivity and confidentiality of the information we maintain. These safeguards will vary depending on the sensitivity, format, location, amount, distribution, and storage of the Personal Data, and include measures designed to keep Personal Data protected from unauthorised access or unlawful processing, together with accidental alteration, destruction, loss and to also ensure compliance with the obligations imposed by the Data Protection Legislation. If appropriate, the safeguards include the encryption of communications via Secure Sockets Layer, encryption of information during storage, firewalls, access controls, separation of duties, and similar security protocols. We restrict access to Personal Data to personnel and third parties that require access to such information for legitimate, relevant business purposes.

Limiting Collection and Retention of Personal Data

We collect, use, disclose, and otherwise process Personal Data that is necessary for the purposes identified in this Privacy Notice or as permitted by law. If we require Personal Data for a purpose inconsistent with the purposes we identified in this Privacy Notice, we will notify you of the new purpose and, where required, seek individuals' consent (or ask other parties to do so on our behalf) to process Personal Data for the new purpose.

In line with our regulatory and legal obligations, including *inter alia* the Anti-Money Laundering and Funding of Terrorism legislation, and the Maltese Tax legislation, we will generally keep the individual's Personal Data for a period of ten (10) years from date of termination of the client relationship, after which time it will be securely destroyed or anonymised if it is no longer required for the lawful purpose(s) for which it was obtained.

We may on exception retain the individual's Personal Data for longer periods, for instance, in view of any outstanding claims or until such time limit for claims arising from the transaction has expired, or where we need to withhold destruction or disposal based on an order from the courts or an investigation by law enforcement agencies or our regulators.

SHARING PERSONAL DATA

In line with our regulatory and legal obligations, and to be able to provide you with our services, there will be instances where we are required to disclose, share, or exchange some or all of the individual's personal data, whether sensitive or otherwise, either within the Group or with other third parties, as set out in the Schedule.

CROSS-BORDER TRANSFER OF PERSONAL DATA

We may transfer or allow the transfer of the individual's Personal Data and your policies placed with us to, or permit access to Personal Data from, organisations within countries outside the European Economic Area (hereinafter referred to as the "EEA"). These countries' data protection laws do not always offer the same level of protection for Personal Data as offered in the EEA. We will, in all circumstances, safeguard Personal Data as set out in this Privacy Notice and ensure that the recipient of the Personal Data provides the individual's Personal Data with the same level of protection required of us.

Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections as EEA data protection laws. EU data protection laws allow us to freely transfer Personal Data to such countries.

We are members of the Group, therefore, we and other companies that are members of the said Group, may hold and process such information: i) in order to provide our services to you; ii) to facilitate the effective management, development, or operation of the Group; and iii) to comply with applicable laws, prevent and detect fraud, and cooperate with regulators, where appropriate.

In circumstances where the recipient entity is outside of the EEA, we ensure that the recipient has adequate and appropriate safeguards in order to protect that Personal Data. Individuals can request additional information about the specific safeguards applied to the export of their Personal Data.

ACCURACY, ACCOUNTABILITY AND OPENNESS

We strive to maintain Personal Data that is accurate, complete, and current. Please keep us informed if your Personal Data changes during your working relationship with us.

You may contact your account handler to have your information updated.

YOUR RIGHTS

To ensure the privacy and protection of your Personal Data, the GDPR has granted you with specific rights. Upon one or more of the below requests, we shall take the necessary action without undue delay, and shall provide you with information on action taken, free of charge, within 30 days of receipt of the request, subject that requests are not manifestly unfounded, repetitive, or excessive. Where we cannot comply within 30 days, we will inform you immediately.

Under certain conditions, you have the following rights:

The right to be informed - We need to inform you about what data is being collected, how it is being used, how long it will be kept, and whether it will be shared with any third parties.

The right to access - You may request us to provide you with a copy of any Personal Data concerning you. We may need to request specific information from you to help us confirm your identity and ensure your right to

access your Personal Data or to exercise any of your other rights. This is a security measure to ensure that Personal Data is only disclosed to those who have a right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

The right to rectification - Should you discover that the information we hold about you is inaccurate or incomplete, you may request that it be updated, or rectified.

The right to erasure - (also known as 'the right to be forgotten') You may request that we erase your Personal Data in certain circumstances, such as when the data is no longer necessary, the data was unlawfully processed, or it no longer meets the lawful ground for which it was collected. This includes instances where you withdraw consent. This is not an absolute right, we may be justified in keeping certain Personal Data in order to perform a contract with you, comply with legal obligations, or in relation to the exercise or defence of legal claims.

The right to restrict processing - Instead of requesting the erasure of data you might opt for a restriction of the processing of data, i.e., a limitation in the way we use your Personal Data. This right can apply when you are contesting the accuracy of your Personal Data or when we no longer need the Personal Data, but you request us to keep it in order to establish, exercise or defend a legal claim.

The right to data portability - You are permitted to obtain your Personal Data from us and reuse such data for your purposes across different services. This right only applies to Personal Data that you have provided to us by way of a contract or consent.

The right to object - You shall have the right to object to the processing of Personal Data that is collected on the grounds of legitimate interests pursued by us or by a third party, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us. In this regard, we shall halt the processing of the Personal Data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms or if the processing is for the establishment, or exercise of defence of legal claims.

We do not currently engage in direct marketing, however if this policy changes at a future date, you will be given the opportunity to withhold or give your permission to receive such materials through an opt out or in message. You have the right to object to the use of your Personal Data for direct marketing purposes (including any profiling for such purposes) at any time.

Rights related to automated decision-making including profiling - The GDPR includes provisions for decisions made with no human involvement, such as profiling, which uses Personal Data to make calculated assumptions about you. You shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning/affecting you. There are strict rules about this kind of processing, and you are permitted to challenge and request a review of the processing if you believe the rules are not being followed.

The right to withdraw your consent - You may withdraw your consent to such processing at any time by contacting our Data Protection Officer. However, doing so may prevent us from continuing to provide you with our services.

These rights are subject to certain exemptions to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege).

DATA PROTECTION OFFICER

If you have any questions concerning this Privacy Notice and our privacy practices, wish to review your Personal Data that Antes may have stored, or submit any requests to exercise any of your legal rights, including lodging a complaint, please contact the Data Protection Officer (DPO) at dpo@antes.mt copying in privacy@allshores.com

If we are unable to resolve an enquiry or a complaint, you have the right to contact the Office of the Information and Data Protection Commissioner:

Office of the Information and Data Protection Commissioner 2nd
floor
Airways House
High Street Sliema
SLM 1549 Malta

Tel: +356 2328 7100

Email: idpc.info@idpc.org.mt

LINKS TO THIRD PARTY WEBSITES

Our websites may contain links directing you to other third-party websites. Please note that third party websites have their own privacy policies and we do not accept any responsibility or liability for their policies or processing of your Personal Data. Please check these policies before submitting any Personal Data to such third-party websites.

CHANGES TO THIS PRIVACY NOTICE

Please note that this Policy may be reviewed, and may change, from time to time. The revised Policy will be posted on our website so that you are aware of the information we collect, how it is used and under what circumstances we disclose it.

[Schedule on following page]

Schedule

We set out in the table below the purposes for which we might use your Personal Data:

Purpose	Categories of Data	Legal Grounds	Disclosures
QUOTATION/ INCEPTION Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks	Personal Data: <ul style="list-style-type: none"> Individual details Identification details Financial information Credit and antifraud data 	Personal Data: <ul style="list-style-type: none"> Performance of our contract with you Compliance with a legal obligation For our legitimate business interests (to ensure that the client is within our acceptable risk profile) To assist with the prevention of crime and fraud In the substantial public interest Consent 	<ul style="list-style-type: none"> Credit reference agencies Antifraud and sanctions databases
QUOTATION / INCEPTION Evaluating the risks to be covered and matching to appropriate policy/premium	Personal Data: <ul style="list-style-type: none"> Individual details Identification details Policy information Credit and antifraud checks 	Personal Data: <ul style="list-style-type: none"> Performance of our contract with you For our legitimate business interests (to determine the likely risk profile and appropriate insurer and insurance product) 	
	Special Categories of Personal Data: <ul style="list-style-type: none"> Risk details Previous claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> Consent In the substantial public interest 	

<p>QUOTATION / INCEPTION and POLICY ADMINISTRATION</p> <p>Collection or refunding of premium</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Financial information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Performance of our contract with you • For our legitimate business interests (to recover debts due to us) 	<ul style="list-style-type: none"> • Other insurance market participants such as intermediaries, insurers, and reinsurers • Banks
<p>POLICY ADMINISTRATION</p> <p>General client care, including communication with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy. Notifying you about changes to our terms or privacy notice</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Performance of our contract with you • For our legitimate business interests (to correspond with clients, beneficiaries, and claimants in order to facilitate the placing of and claims under insurance policies) • Compliance with a legal obligation • Consent 	
	<p>Special Categories of Personal Data</p> <ul style="list-style-type: none"> • Risk details • Previous claims • Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent • In the substantial public interest 	

CLAIMS PROCESSING Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks	Personal Data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information Credit and antifraud data 	Personal Data: <ul style="list-style-type: none"> Performance of our contract with you For our legitimate business interests (to assist our clients assessing and making claims) 	<ul style="list-style-type: none"> Claims handlers Lawyers Loss adjusters/surveyors Experts Third parties involved in the claim (including without limitation other insurance market participants such as intermediaries, insurers, and reinsurers)
	Special Categories of Personal Data: <ul style="list-style-type: none"> Risk details Previous claims Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> Consent For legal claims In the substantial public interest 	<ul style="list-style-type: none">
CLAIMS PROCESSING Defending or prosecuting legal claims	Personal Data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information Credit and antifraud data 	Personal Data: <ul style="list-style-type: none"> Performance of our contract with you For our legitimate business interests (to assist in assessing and making claims) 	<ul style="list-style-type: none"> Claims handlers Lawyers Loss adjusters Experts Courts/adjudicating bodies Third parties involved in the claim (including without limitation other insurance market participants such as intermediaries, insurers, and reinsurers)
	Special Categories of Personal Data: <ul style="list-style-type: none"> Risk details Previous claims Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> Consent For legal claims In the substantial public interest 	

CLAIMS PROCESSING Investigating and prosecuting fraud	Personal Data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information Credit and antifraud data 	Personal Data: <ul style="list-style-type: none"> Performance of our contract with you For our legitimate business interests (to assist with the prevention and detection of fraud) 	<ul style="list-style-type: none"> Lawyers Private investigators Police Experts Third parties involved in the investigation or prosecution Other insurance market participants such as intermediaries, insurers, and reinsurers Antifraud databases
	Special Categories of Personal Data: <ul style="list-style-type: none"> Health data Other sensitive data Risk details Previous claims Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> Consent For legal claims In the substantial public interest 	
	Personal Data relating to criminal records: <ul style="list-style-type: none"> Criminal convictions and offences 	Personal Data relating to criminal records: <ul style="list-style-type: none"> Performance of our contract with you, when authorised by Maltese legislation 	
RENEWALS Contacting you in order to renew the insurance policy	Personal Data: <ul style="list-style-type: none"> Individual details Policy information 	Personal Data: <ul style="list-style-type: none"> Performance of our contract with you For our legitimate business interests (to correspond with clients, beneficiaries, and claimants in order to facilitate the placing of and claims under insurance policies) Consent 	
	Special Categories of Personal Data: <ul style="list-style-type: none"> Risk details Previous claims Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> Consent 	

<p>THROUGHOUT THE INSURANCE LIFECYCLE</p> <p>Transferring books of business, company sales and re-organisations. To administer and protect our business</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information • Marketing and communications data • Credit and antifraud data 	<p>Personal Data:</p> <ul style="list-style-type: none"> • For our legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and to structure our business appropriately) • Compliance with a legal obligation 	<ul style="list-style-type: none"> • Group Companies • Courts • Purchaser (potential and actual)
<p>THROUGHOUT THE INSURANCE LIFECYCLE</p> <p>General risk modelling and underwriting</p>	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Risk details • Previous claims • Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent • In the substantial public interest 	
<p>THROUGHOUT THE INSURANCE LIFECYCLE</p> <p>General risk modelling and underwriting</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information • Credit and antifraud data 	<p>Personal Data:</p> <ul style="list-style-type: none"> • For our legitimate business interests (to build risk models that allow placing of risk with appropriate insurers) 	
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Risk details • Previous claims • Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent • In the substantial public interest 	

<p>THROUGHOUT THE INSURANCE LIFECYCLE</p> <p>Complying with our legal or regulatory obligations</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information • Marketing and communications data • Credit and antifraud data 	<p>Personal Data:</p> <ul style="list-style-type: none"> • Compliance with a legal obligation 	<ul style="list-style-type: none"> • MFSA, FIAU, IDPC and other regulators • Police • Other insurance market participants such as intermediaries, insurers, and reinsurers (under court order) • Insurance Fraud database
	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Risk details • Previous claims • Current claims 	<p>Special Categories of Personal Data:</p> <ul style="list-style-type: none"> • Consent • In the substantial public interest 	
<p>MARKETING</p> <p>To make suggestions and recommendations to you about products or services or events that may be of interest to you and to provide industry insight</p>	<p>Personal Data:</p> <ul style="list-style-type: none"> • Individual details • Policy information 	<p>Personal Data:</p> <ul style="list-style-type: none"> • For our legitimate interests (to develop our products/services and grow our business) 	