

CONVEX CCPA PRIVACY POLICY

This privacy policy (“Policy”) explains how Convex Insurance UK Limited (“we” or “us”) collects, uses, and discloses Personal Information subject to the California Consumer Privacy Act (“CCPA”). “Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident (“Consumer”) or household. This Policy also describes the privacy rights of Consumers and how they can exercise those rights.

The CCPA does not apply to certain types of information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”) or the Fair Credit Reporting Act (“FCRA”). This means that this Policy may not apply to Personal Information that we collect about individuals who seek, apply for, or obtain insurance products or services for personal, family, or household purposes. The CCPA also has limited application to Personal Information we collect in connection with providing a product or service to a business.

PERSONAL INFORMATION WE COLLECT

We collect the categories of Personal Information described below from the sources described below. Some of this Personal Information may be subject to GLBA or FCRA.

Directly From You

We may collect the following categories of Personal Information about you in the preceding 12 months that you include in your application or other forms that you submit, or that you otherwise provide to us, we will only collect information relevant to your business requirements with us:

- Identifiers, including information such as your name, address, contact phone numbers and email addresses, and date of birth.
- Protected personal information, such as your bank and payment details and other government ID to verify your identity such as passport details, driving license, and social security number.
- Characteristics of protected classifications, such as your family relations, lifestyle, gender, and age. This may also include information about your relationship to the policyholder where you are the beneficiary.
- Commercial information, including personal financial information and financial records.
- Internet or other electronic network activity information related to your interactions with our online systems.
- Professional or employment related information, including previous occupation and employment history, job title and professional accreditations.
- Inferences drawn from other personal information, including any information which is relevant to your insurance application such as previous insurance policies you have held and claims you have made. This will also include any information specific to the type of policy you are applying for, for example, if you are applying for a fine art policy we may collect and use information which relates to your art collection.
- Any other information passed on from you.

From Our Affiliates and Third Parties

We may collect the following categories of Personal Information about you in the preceding 12 months from our affiliates and other third parties to meet our regulatory, legal and business requirements. These can include, claims handlers, loss adjusters, agents, brokers, consumer reporting agencies, private investigators, accountants, auditors, banks, lawyers and other experts including medical experts:

- Identifiers, to identify you in our systems.
- Commercial information, including any financial information about you which we have obtained as a result of conducting credit checks such as bankruptcy orders, individual voluntary arrangements or county court judgments.
- Medical information and health insurance information.
- Other publicly available information, which may include:

1. Information which we obtain as part of checking sanctions lists, such as those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (“OFAC”) and the U.S. Department of Commerce, Bureau of Industry and Security.
 2. Information which we have gathered from sources such as the electoral roll, newspapers, referrals from current or past colleagues and social media sites.
 3. Information relating to criminal and/or civil offences.
- Any other information passed on from your insurance broker or someone else applying on your behalf.

We may also draw inferences from the Personal Information we collect directly from you or from our affiliates and third parties.

HOW WE USE PERSONAL INFORMATION

The purposes for which we use Personal Information depend on our relationship or interaction with a specific Consumer. We may use Personal Information to underwrite your insurance policy and evaluate claims under your policy; to operate and manage our business; to provide and maintain our insurance products and services; to verify your identity; to detect and prevent fraud; for vendor management purposes; to operate, manage, and maintain our business, such as developing and marketing our products and services; to conduct research and data analysis; to comply with applicable laws; to respond to civil, criminal, or regulatory lawsuits or investigations; to exercise our rights or defend against legal claims; to resolve complaints and disputes; to perform compliance activities; and to perform institutional risk control.

PERSONAL INFORMATION WE DISCLOSE

We disclose the categories of Personal Information described in “Personal Information We Collect” for the purposes described in “How We Use Personal Information” to the following categories of third parties:

Category of Personal Information	Examples	Categories of Third Parties to which the Category of Personal Information is Disclosed
<u>Identifiers</u> : A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	Information such as your name, address, contact phone numbers and email addresses, date of birth, social security number, passport details, and driver’s license number.	Third party service providers that support our business operations and IT infrastructure; government entities; brokers and other insurance intermediaries; other insurers and reinsurers; insurance industry bodies; other third parties for claims handling or policy expert services; and our affiliates.

Category of Personal Information	Examples	Categories of Third Parties to which the Category of Personal Information is Disclosed
<p><u>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)):</u> A name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	<p>Government ID, insurance policy numbers, employment, lifestyle, health and financial information. This may also include information about your relationship to the policyholder where you are the beneficiary.</p>	<p>Third party service providers that support our business operations and IT infrastructure; government entities; brokers and other insurance intermediaries; other insurers and reinsurers; insurance industry bodies; other third parties for claims handling or policy expert services; and our affiliates.</p>
<p><u>Characteristics of protected classifications under California or federal law:</u> Race, color, age (40 years and older), ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>Family relationships, lifestyle, health, and age. This may also include information about your relationship to the policyholder where you are the beneficiary.</p>	<p>Third party service providers that support our business operations and IT infrastructure; government entities; brokers and other insurance intermediaries; other insurers and reinsurers; insurance industry bodies; other third parties for claims handling or policy expert services; and our affiliates.</p>
<p><u>Commercial information:</u> Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Financial information about you which we have obtained as a result of conducting credit checks such as bankruptcy orders, individual voluntary arrangements or county court judgments.</p>	<p>Third party service providers that support our business operations and IT infrastructure; government entities; brokers and other insurance intermediaries; other insurers and reinsurers; insurance industry bodies; other third parties for claims handling or policy expert services; and our affiliates.</p>

Category of Personal Information	Examples	Categories of Third Parties to which the Category of Personal Information is Disclosed
<p><u>Biometric information</u>: Physiological, biological or behavioral characteristics, including an individual’s deoxyribonucleic acid (DNA), imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise.</p>	<p>We do not collect this category of personal information.</p>	<p>None.</p>
<p><u>Internet or other electronic network activity information</u>: Browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.</p>	<p>Information collected through your interactions with our web services, applications, and platforms.</p>	<p>Third party service providers that support our business operations and IT infrastructure; government entities; brokers and other insurance intermediaries; other insurers and reinsurers; insurance industry bodies; other third parties for claims handling or policy expert services; and our affiliates.</p>
<p><u>Geolocation data</u>: Physical location and/or movements.</p>	<p>We do not collect this category of personal information.</p>	<p>None.</p>
<p><u>Sensory data</u>: Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<p>We do not collect this category of personal information.</p>	<p>None.</p>
<p><u>Professional or employment-related information</u>: Current and/or past employment history including performance evaluations.</p>	<p>Previous occupation and employment history, job title and professional accreditations.</p>	<p>Third party service providers that support our business operations and IT infrastructure; government entities; brokers and other insurance intermediaries; other insurers and reinsurers; insurance industry bodies; other third parties for claims handling or policy expert services; and our affiliates.</p>

Category of Personal Information	Examples	Categories of Third Parties to which the Category of Personal Information is Disclosed
<p><u>Non-public education information (as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)):</u> Education records, files, documents, and other materials directly related to a student maintained by an educational agency or institution or by a person acting for such an agency or institution, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p>	<p>We do not collect this category of personal information.</p>	<p>None.</p>
<p><u>Inferences drawn from other personal information:</u> Information used to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>Any information which is relevant to your insurance application such as previous insurance policies you have held and claims you have made. This will also include any information specific to the type of policy you are applying for, for example, if you are applying for a fine art policy we may collect and use information which relates to your art collection.</p>	<p>Third party service providers that support our business operations and IT infrastructure; government entities; brokers and other insurance intermediaries; other insurers and reinsurers; insurance industry bodies; other third parties for claims handling or policy expert services; and our affiliates.</p>

In the past 12 months, we did not sell Personal Information, as the term “sell” is defined under the CCPA. We do not sell Personal Information, including the Personal Information of consumers under 16 years of age.

We may disclose Personal Information in connection with the sale of all or part of our business.

YOUR RIGHTS

You may have certain rights under the CCPA. These rights are subject to certain conditions and exceptions. Your rights under the CCPA may include:

- Right to Request to Know.** You have the right to request to know the following information about our practices during the past 12 months: (i) the categories of Personal Information we collected about you; (ii) the categories of sources from which we collected the Personal Information about you; (iii) the categories of third parties to which we disclosed Personal Information for a business purpose; (iv) the categories of Personal Information we disclosed about you for a business purpose; (v) our business or commercial purpose for collecting your Personal Information; and (vi) the specific pieces of Personal Information we collected about you.

You may exercise your right to request to know twice in a 12-month period, free of charge. If we are unable to fulfil your request to know, we will let you know the reason why. Please note, in response to a request to know, we are prohibited from disclosing your social security number; driver’s license number or other government-issued identification number; financial account number; any health insurance or medical identification number; an account password, security questions, or answers; and unique biometric data generated from measurements or technical

analysis of human characteristics.

- **Right to Request to Delete.** You have the right to request that we delete the Personal Information that we have collected from you. We may deny your request under certain circumstances, such as if we need to retain your Personal Information to comply with our legal obligations or if retaining the information is necessary to complete a transaction for which your Personal Information was collected. If we deny your request to delete, we will let you know the reason why.
- **Right to Non-Discrimination.** If you choose to exercise any of these rights, we will not discriminate against you in any way.

If you, or your authorized agent, would like to make a request to know or request to delete, contact us at [broker / agent toll-free number] or [by emailing your agent or broker who handled this insurance at the email address under "Contacting Us" below]. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

We will take steps to verify your identity before processing your request to know or request to delete. We will not fulfil your request unless you have provided sufficient information for us to reasonably verify that you are the individual about whom we collected Personal Information. We may request additional information about you so that we can verify your identity. We will only use additional Personal Information you provide to verify your identity and to process your request.

You may use an authorized agent to submit a request to know or a request to delete. When we verify your agent's request, we may verify both your and your agent's identity and request a signed document from you that authorizes your agent to make the request on your behalf. To protect your Personal Information, we reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf. You may also make a consumer request on behalf of your minor child.

UPDATES TO PRIVACY NOTICE

We may change or update this Policy from time to time. If we make material changes to this Policy, we will provide you with an updated copy of the Policy.

CONTACTING US

If you have any questions or concerns about this Policy or would like to learn more about how we protect your privacy, please contact the agent or broker through whom you purchased this insurance policy at [insert email / phone details].

Effective Date: 25 March 2021