**Wakam UK: Privacy Notice**

We are Wakam UK Limited. We take data privacy very seriously and this privacy notice is designed to help you understand how and why we use your personal information.

We encourage you to read the whole notice. Alternatively, if you wish to read about specific privacy practices that interest you, please click on the relevant links below.

# **The purpose of this privacy notice**

## **Identity**

Wakam UK Limited (**Wakam UK**) is a company registered in England and Wales with company number 14778827. Our registered office is at 18th & 19th Floors 100 Bishopsgate, London, United Kingdom, EC2N 4AG. We are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under Firm Reference Number 995565.

Wakam UK is an insurance company that creates white-label, tailor-made and embedded insurance solutions for its distributor partners and clients.

## **Our use of personal information**

We will collect, use and share information, including personal information, in connection with providing our services and operating our business.

## **This privacy notice**

This is our main general privacy notice that applies across our business, although we may publish additional privacy statements that apply to specific services that we offer from time to time.

If an additional privacy statement is relevant to you because of the way in which you engage with us and there is a conflict between the information set out in this privacy notice and the additional privacy statement, then the additional privacy statement will take precedence over the information set out in this privacy notice.

We have a separate privacy notice that sets out how we process the personal information of our staff, which prospective, current and former members of staff should refer to.

## **Updating this privacy notice**

## We may update this privacy notice at any time. We will take reasonable measures to communicate any substantial changes that we make to this privacy notice to you – for example, by posting an updated version of this privacy notice on our website, or by sending you an updated version of this privacy notice by email. We also encourage you to check this page from time to time for any changes.

## This privacy notice is dated January 2025.

## **What is personal information?**

## Personal information is any data relating to an identified or identifiable natural person who can be directly or indirectly identified from that data. This includes obvious things like your name, address and telephone number but can also include less obvious things like analysis of your use of our website. There are different types of personal information. The most important types for you to know about are:

## ***Special categories of personal information*** – these categories of personal information are afforded additional protection under the data protection laws that apply to us. These categories include information about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership, your genetic data and biometric data, and information concerning your sex life or sexual orientation; and

## ***Criminal convictions information*** – this is information relating to your criminal convictions and offences. Data protection laws that apply to us restrict the way in which we can use this information when compared to, for example, your name and address.

## **Our responsibility to you**

## We process your personal information in our capacity as a *controller*. This means that we are responsible for deciding how we hold and use your personal information and ensuring that we comply with relevant data protection laws when processing your personal information.

## **Data protection officer**

## We have a data protection officer whose job is to oversee our data protection compliance. You can contact our data protection officer by sending:

## an email to: uk\_dataprotection@wakam.com]; or

## a letter to: The Data Protection Team, Wakam UK Limited, 18th & 19th Floors 100 Bishopsgate, London, United Kingdom, EC2N 4AG.

# **Your personal information**

## **Why are we collecting personal information about you?**

## We collect personal information about you in connection with our provision of services and the running of our business more generally. This includes providing insurance quotes, underwriting insurance policies and dealing with any resultant insurance claims or complaints. We may hold information about you if:

## you are (or you represent, work for, or own) a prospective, current, or former customer of Wakam UK;

* you are (or you represent, work for, or own)
* you are covered by an insurance policy underwritten by Wakam UK;
* you are involved in a claim made by an insurance policy underwritten by us, for example you are a witness to or involved in an accident that has led to the claim or you are appointed as an expert or investigator in relation to the claim;
* you are (or you represent, work for, or own) a supplier of products or services to Wakam UK;
* you represent a regulator, certification body or government body which has dealings with Wakam UK; or

## you visit our website (including where you contact us through our website) or subscribe to our marketing.

## **What personal information do we collect about you?**

The types of information we process about you may include:

|  |  |
| --- | --- |
| **Types of personal information** | **Details** |
| **Individual details** | Your name, address, other contact details (for example, email address and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and job category. |
| **Identification details** | Identification numbers issued by government bodies or agencies, such as your passport number, national insurance number, tax identification number and driving licence number. |
| **Financial information** | Bank account or payment card details, income or other financial information. |
| **Risk details** | Information which we need to collect in order to assess the risk to be insured and provide a quote. Depending on the type of policy, this may include special categories of personal information, criminal convictions information and/or telematics data. |
| **Policy information** | Information about the quotes received and the policies taken out. |
| **Credit, anti-fraud and sanctions data** | Credit history, credit score and information received from various anti-fraud and sanctions databases relating to you. |
| **Claims information** | Information about you which is relevant to a claim under an insurance policy underwritten by us as well as, where relevant, information about you relating to claims under other insurance policies which we do not underwrite. This information may include special categories of personal information and criminal convictions information. |
| **Special categories of personal information** | Information about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership; your genetic and biometric data; and information about your sex life or sexual orientation. |
| **Criminal convictions information** | Information relating to your criminal convictions and offences. |
| **Identifiers** | Information which can be traced back to you, such as an IP address, a website tracking code or electronic images of you. |

## **Where do we collect your personal information from?**

## We may collect your personal information from various sources, including:

# directly from you;

# your employer or the organisation that you represent, work for or own;

# other relevant insurance market participants such as intermediaries, insurers and reinsurers;

# our customers and service providers;

# credit reference agencies;

# anti-fraud databases, sanctions lists, court judgements and other databases;

# government agencies and publicly accessible registers or sources of information;

# in relation to a claim, third parties involved in the claim, including witnesses and experts; and

# by actively obtaining your personal information ourselves, for example through the use of website tracking devices.

## The sources that apply to you will depend on why we are collecting your personal information. Where we obtain your information from a third party – in particular, your employer or the organisation that you represent or work for – we may ask them to provide you with a copy of this privacy notice (or, if applicable, a shortened version of it) to ensure you know we are processing your information and the reasons why.

# **Our use of your personal information**

## **How do we use your personal information and what are our legal grounds for doing so?**

## We may process your personal information in many different ways – including by collecting, recording, organising, storing, analysing, modifying, extracting, sharing, deleting and/or destroying it.

## In this section we set out in more detail:

## the main purposes for which we process your personal information; and

## the legal bases upon which we are processing your personal information.

|  |  |
| --- | --- |
| **Purpose** | **Legal basis** |
| **Evaluating risks to be covered and underwriting**  We may use personal information when evaluating the risks to be covered in the context of underwriting an insurance policy.  In some cases, this information will include special categories of personal data and criminal convictions data. | For all information – **legitimate interests.**  We have a legitimate interest in using your information where this is necessary or appropriate to determine the risk profile of the insurance risk we take on.  For special category and criminal convictions data – necessary for an **insurance purpose**. |
| **Know your client, supplier and counterparty and other legal obligations, in addition to fraud investigation and recovery**  We obtain information about our clients, suppliers and counterparties and their representatives and beneficial owners and others to help us comply with legislation on money laundering, terrorist financing, and sanctions. We may also use your personal information in the context of fraud investigation and recovery.  We also collect and disclose personal information under applicable legislation and under orders from courts and regulators. Our disclosures will be to those bodies and persons who are entitled to receive the required information.  In some cases, this information will include special categories of personal data and criminal convictions data. | For all information – **compliance with a legal obligation.**  Where applicable, we will also rely on the '**performance of a contract**' legal basis for processing.  For special category and criminal convictions data –**preventing or detecting unlawful acts**, and **suspicion of terrorist financing or money laundering**. |
| **Performing contracts of insurance, including communicating with you and with third parties in the course of operating our business**  We use personal information when performing our obligations under insurance policies we have underwritten, including when communicating with you in the course of operating our business and when managing insurance claims.  In some cases, this information will include special categories of personal data and criminal convictions data. | For all information – **legitimate interests.**  We have a legitimate interest in using your information where this is necessary or appropriate to perform a contract of insurance or to communicate with you and with third parties in the course of operating our business.  Where applicable, we will also rely on the '**performance of a contract**' legal basis for processing.  For special category and criminal convictions data – necessary for an **insurance purpose**. |
| **Claims handling, claims management and claims administration**  We use personal information where this is necessary or appropriate in order to administer and handle our insurance claims.  In some cases, this information will include special categories of personal data and criminal convictions data. | For all information – **legitimate interests.**  We have a legitimate interest in using your information where this is necessary or appropriate to assess and manage claims.  For special category and criminal convictions data – necessary for an **insurance purpose**. |
| **Renewals**  We may use your personal information to evaluating the risks to be covered on renewal and, where relevant, to contact you about renewing your insurance policy and handling payments in relation to premiums. | For all information – **legitimate interests.**  We have a legitimate interest in using your information where this is necessary or appropriate to determine the risk profile of the insurance risk we take on at the renewal stage.  For special category and criminal convictions data – necessary for an **insurance purpose**. |
| **Marketing and improving and tailoring our services and website**  We may use your personal information to carry out analysis and market research and to carry out marketing activities, including online advertising.  We may also use your personal information to provide tailored services to clients and to improve our website and services more generally.  Please see our Cookies notice here for further information on the cookies used on our website. https://www.wakam.com/en/cookies/  We do not generally look to collect special categories of personal data and criminal convictions data for this purpose. | **Legitimate interests.**  We have a legitimate interest in carrying out marketing activities to promote our business and in improving and tailoring our services and website.  **Consent.**  Where we cannot rely on our legitimate interests to process your personal information for any of these purposes, we will do so only with your consent. |
| **Administrative and management purposes**  We may use your personal information for our own administrative and management purposes.  We do not generally look to collect special categories of personal data and criminal convictions data for this purpose. | **Legitimate interests.**  We have a legitimate interest in carrying out our own administrative and management functions. |
| **Service providers**  We collect information about you in connection with your provision of services to us or your position as a representative or worker of a provider of services to us.  We do not generally look to collect special categories of personal data and criminal convictions data for this purpose, other than where we are required to do so to meet our legal obligations (see 'Know your client, supplier and counterparty and other legal obligations' above). | **Legitimate interests.**  We have a legitimate interest in contacting and dealing with individuals involved in providing services to us. |
| **Visitors to our offices**  We have security measures in place at our offices, which include building access controls and may include CCTV. Images captured by CCTV are securely stored and only accessed on a need to know basis – for example, to look into an incident. CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft).  We require visitors to our offices to sign in at reception and we keep a record of visitors for a short period of time.  Our visitor records are securely stored and only accessible on a need to know basis – for example, to look into an incident.  We do not generally look to collect special categories of personal data and criminal convictions data for this purpose. | **Legitimate interests.**  We have a legitimate interest in making sure our offices, and the people that visit and work at our offices, are safe and secure. |
| **Establishing our legal position**  We may use your personal information, including sharing it with our legal advisers, when looking to establish our legal position. This includes exercising our legal rights and defending legal claims.  In some cases, this information will include special categories of personal data and criminal convictions data. | For all information – l**egitimate interests.**  We have a legitimate interest in understanding and establishing our legal rights and obligations.  For special category and criminal convictions data – **the establishment, exercise or defence of legal claims.** |

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## **Failure to provide your personal information to us**

## We cannot force you to provide your personal information to us and you can choose not to provide us with your personal information. Where we need to collect your personal information by law or in order to process your instructions, provide you with our services or perform a contract we have with you and you decide not to provide that information when requested, we may not be able to carry out your instructions, provide our services or perform the contract we have or are trying to enter into with you. In other circumstances where you choose not to provide us with your personal information we request, your decision not to provide us with your personal information may affect our ability to provide certain of our products and services.

## **Consent**

## We do not generally process your personal information based on your consent (as we can usually rely on another legal basis). Where we do process your personal information based on your consent, you have the right to withdraw your consent at any time. To withdraw your consent please email us at [uk\_dataprotection@wakam.com](mailto:uk_dataprotection@wakam.com) or, to stop receiving our marketing emails or updates, please click on the unsubscribe link in the relevant email you receive from us. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose(s) to which you originally consented unless there is another legal ground for the processing. Please note that where we rely on your consent to process your personal information and you choose to withdraw your consent, your decision may affect our ability to provide certain of our products and services.

## **Do we share your information with anyone else?**

# We do not sell your information. However, we may share your information in the following circumstances:

# where it is necessary or appropriate for the purposes for which we hold your information and we have a lawful basis for doing so, we share your relevant information with other members of the Wakam group;

# in order to operate our business efficiently, we require the assistance of various external providers of professional services (such as legal advisers, accountants and auditors) and support services (such as IT service providers). The use of these services may involve the service provider receiving your relevant information from us;

# insurance involves the use and disclosure of your personal information by various insurance market participants such as intermediaries, insurers and reinsurers. Where necessary or appropriate in relation to our insurance business, we will disclose your personal information to relevant insurance market participants. For further information on how the insurance market uses and discloses personal information please see The London Insurance Market Core Uses Information Notice, which we adhere to, and which can be found by clicking on the following link: <https://lmg.london/wp-content/uploads/2024/05/Lloyds-Core-Uses-Notice-Document-28-05-24.pdf>;

# in connection with a sale or business transaction. If we sell our business or undergo another business transaction (such as a reorganisation, merger, joint venture, assignment, transfer, or other disposition of any or all portion of our business, assets, or stock, including in connection with any bankruptcy or similar proceedings), then your information may be shared with, or transferred to, a third party;

# to protect the rights, property and safety of Wakam UK and others. Such information will be disclosed in accordance with applicable laws and regulations. This includes where we share information with other parties in the context of litigation discovery and in response to subpoenas and court orders; and

# we share your personal information with other third parties, such as relevant public and government authorities, including regulators and law enforcement bodies, where we are required or requested to do so to comply with legal or regulatory requirements.

# **Other important things you should know**

## **Keeping your personal information safe**

# We take security issues seriously. We implement appropriate steps to help maintain the security of our information systems and processes and prevent the accidental destruction, loss, or unauthorised disclosure of the personal information we process.

## **Profiling and automated decision making**

## We do not use profiling (where an electronic system uses personal information to try and predict something about you) or automated decision making (where an electronic system uses personal information to make a decision about you without human intervention).

## **How long do we keep your personal information?**

## We keep your personal information for no longer than is necessary for the purposes described in this privacy notice and, in any event, no longer than we are permitted to under applicable law.

## Our retention periods are based on the requirements of relevant data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and our business purposes.

## If you would like further details regarding applicable retention periods, please email us at uk\_dataprotection@wakam.com.

## **Cross border transfers of your personal information**

## The nature of our business means that your personal information may well be transferred across national boundaries, including, potentially, to countries that do not require organisations by law to look after your personal information in the way in which you have come to expect in your own country. Where we transfer your personal information across national boundaries, we will protect your personal information by ensuring that those transfers are made in compliance with all relevant data protection laws. For example, where we transfer your personal information from the UK to a third party that is located in a country that is not recognised by the UK Government as providing an adequate level of data protection, we normally do so subject to safeguards that assure the protection of your personal information, such as standard contractual clauses approved by the UK Government.

## If you would like further details of how your personal information is protected when transferred from one country to another then please email us at uk\_dataprotection@wakam.com.

## **Your rights**

## **Contacting us and your rights**

## If you have any questions or complaints in relation to our use of your personal information, please email us at uk\_dataprotection@wakam.com.

## Under certain conditions you may have the right to require us to:

## provide you with further details on the use we make of your personal information;

## confirm whether we process personal information about you and (where this is the case) provide you with access to the personal information we hold about you;

## update any inaccuracies in the personal information we hold about you;

## delete any of your personal information that we no longer have a lawful ground to use;

## where processing is based on consent, stop that processing by withdrawing your consent (which you may do at any time);

## object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights;

## restrict how we use your personal information whilst a complaint is being investigated; and/or

## transfer your personal information to you or to a third party in a standardised machine-readable format.

## In certain circumstances, we may need to restrict your rights to safeguard the public interest (for example, the prevention or detection of crime) and our interests (for example, the maintenance of legal privilege).

## To exercise any of your rights, please email us at uk\_dataprotection@wakam.com. We will assess any request to exercise your rights on a case-by-case basis and we may ask you for proof of identity or other information before doing so.

## We also are obliged to keep your personal information accurate and up to date. Please help us to do this by advising us of any changes to your personal information.

## Please note that if you ask us to delete your personal information, it may take us more time to delete your information from our back-up systems than it does from our active servers.

## Please also note that if you ask us not to process your personal information, we may need to keep some information in order to fulfil your request, for example, we will retain enough information about you to ensure that your preference not to receive direct marketing is respected in the future.

## **Your right to complain**

## If you are not satisfied with our use of your personal information or our response to any request by you to exercise your rights, or if you think that we have breached any relevant data protection laws, then you have the right to complain to the authority that supervises our processing of your personal information.

Details for the UK data protection regulator, the Information Commissioner's Office, can be found at <https://ico.org.uk>.