

# Privacy Policy 2

Updated on June 30th, 2023

## Introduction

Thank you for choosing MyGlobalShield. We are dedicated to safeguarding your personal data and upholding the highest standards of privacy. This privacy notice outlines how we collect and utilize your personal data, as well as your rights regarding your information. If you have any questions or concerns, please don't hesitate to contact us. We are here to assist you.

## Data Controller

MyGlobalShield acts as the data controller for any personal data we collect and hold. As a data controller, we have the responsibility of determining the purpose and manner in which your personal data is used. Our processing activities include the collection, storage, analysis, sharing, retention, and disposal of personal data. We are registered with the relevant Supervisory Authority or Privacy Regulator, ensuring compliance with data protection regulations.

## Purpose of Collecting Personal Data

To provide you with exceptional service, address your inquiries, assess the suitability of our products or services, and establish a relationship with you, we require certain personal data. In certain cases, if we already possess some of your personal data, such as if you are an existing member, we may not need to collect it again. Rest assured, we will communicate this clearly to you.

Please note that we only collect and use your personal data when necessary and always with your consent. We prioritize the security and confidentiality of your information, adhering to strict data protection protocols.

## What personal data do we collect?

At our company, we collect a variety of personal data to ensure the smooth operation of our business and to manage our relationship with you. We use this data to provide you with our products and services, fulfill legal requirements, enhance your experience, and keep you informed about relevant marketing updates. In this section, we will outline the different types of personal data we collect and explain why we ask for it.

Please refer to the table below for a breakdown of the data types and their purposes:

**Data type: Name, Title, Sex, Address**

**How we use it:**

- To identify you accurately
- To open and manage your accounts and relationship with us
- To provide products and services from our partners
- To enhance your experience with our products and services

- To share relevant marketing information about our products and services
- To meet our legal and regulatory obligations
- To process your job applications with us

**Data type: Date of Birth/Age**

**How we use it:**

- To identify you accurately
- To open and manage your accounts and relationship with us
- To confirm your age
- To meet our legal and regulatory obligations
- To process your job applications with us

**Data type: Nationality**

**How we use it:**

- To meet our legal and regulatory obligations
- To open and manage your accounts and relationship with us

**Data type: Occupation**

**How we use it:**

- We ask for your profession or occupation to determine eligibility for certain products and services
- To provide you with the relevant information when you contact us

**Data type: National Identifier Numbers, passport, and driving license**

**How we use it:**

- To verify your identity when you apply for a product or job with us
- To comply with tax reporting regulations

**Data type: Email address and phone number**

**How we use it:**

- To enable you to register for an online account or any app we may offer
- To contact you about your account(s)
- To send you marketing information, if you have given your consent
- To provide updates about our products, services, and community activities
- To process any job applications you have with us
- To run and administer competitions or prize draws you have entered

**Data type: Call recordings**

**How we use it:**

- We log and record calls you make to us to provide optimal service and resolve discrepancies or issues
- We may record calls for training and monitoring purposes, as required by law

**Data type: Smartphone applications**

**How we use it:**

- To ensure the best experience with our digital or mobile app, we may ask for details about your phone's operating system

**Data type: Geo location data****How we use it:**

- When using our MyGlobalShield app through a mobile device, we may collect and store location data, such as GPS coordinates (latitude and longitude), to improve your browsing experience
- Location data does not reveal personally identifiable information and may be used in conjunction with other data to provide relevant services
- Some features may not function properly without access to location data

**Data type: How you interact with us****How we use it:**

- We record your interactions with us to deliver the best service and prevent fraud
- This includes transactions carried out over the phone, internet, or any online services we offer

**Data type: Direct marketing preferences****How we use it:**

- We ask for your explicit consent to send you notifications about our products and services
- We will only contact you through the methods that you have chosen (e.g., phone, text, or email)

**Data type: Employment status****How we use it:**

- We ask for your employment status to determine eligibility for certain products and services
- This information ensures that you receive accurate and relevant information when contacting us

**Data type: Family details (e.g., marital status, next of kin, dependents)****How we use it:**

- We use this information to understand your circumstances and needs
- It helps us assess the suitability of products and services you apply for with us or our partners

By collecting and using this personal data, we aim to provide you with high-quality service, comply with legal obligations, and tailor our offerings to best suit your needs. The privacy and security of your personal data are of utmost importance to us, and we handle it responsibly and in accordance with applicable laws and regulations. For more specific information on how we use your personal data, please refer to the 'how do we use your personal data' section of our privacy policy.

**Why do we need your personal data?**

Our commitment to protecting your personal data and privacy is of the utmost importance to us. We acknowledge that some of the information we collect may seem sensitive, for example, information about your health or other ailments that

could impact your insurance cover. In such cases, we strive to collect only the minimum necessary information. We do not generally collect special category data about you, but sometimes the personal data we collect may reveal it. As an insurer, we may collect health-related information to monitor and report on equality and diversity.

**Where do we obtain your data from?**

We obtain your personal data from a variety of sources, such as when you apply for our products or services online or over the phone, update your information online or over the phone, or when you use our websites, online web chat services, or mobile apps. We may also obtain personal data relating to you from third parties as part of the application process for one of our products or services, such as individuals who are joint applicants on an account you hold or are applying for or a nominated representative.

**How do we collect special category data?**

We understand the sensitivity of special category data, and in most cases, we will ask for your explicit consent before collecting it, unless we are required by law, there is an overriding public interest, or where we believe you or someone else may be at risk. If you contact us containing this type of information, we will assume that you are happy for us to record it, unless you tell us not to. We respect your right to withdraw your consent to us recording and using special category data at any time. This will not affect any use we have made of the information before you withdrew your consent.

**Personal data regarding children**

Finally, we take the protection of children's personal data seriously, and though we don't offer products directly to children, we may incidentally collect their data when you apply for family policy. We will only ask for the minimal amount of data to enable an accurate quotation of coverage. All personal data we collect, including children's personal data, will be safeguarded and kept secure, with access only to those who need it within our business.

**What personal data do we collect?**

At MyGlobalShield, we take the protection of your personal data seriously. We collect and process your personal data for various purposes, and we always ensure that we have a valid lawful basis for doing so. We believe in being transparent about the reasons behind collecting and processing your personal data, which is why we've outlined the different lawful bases we rely on in the table below:

Lawful Basis	Description
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Consent	You have given free and clear consent for us to process your personal data for a specific purpose.
Contract	The processing is necessary for a contract we have with you, or because we have asked you to take specific steps before entering into a contract (e.g., providing a quote).
Explicit Consent	You have given explicit consent for us to process your sensitive personal data (special category) for a specific purpose.
Legal Obligation	The processing is necessary for us to comply with the law or a legal requirement.
Legitimate Interest	The processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests.

We understand that your personal data deserves the utmost care and protection. That's why we are committed to using your personal data only for the purposes for which we collected it, unless we have a valid reason to use it for another purpose that is compatible with the original purpose. If we ever need to use your personal data for an unrelated purpose, we will notify you and provide an explanation of the legal basis for doing so.

For more detailed information on how we use your personal data, please refer to the dedicated section in our privacy policy. We strive to maintain transparency and ensure that you have a clear understanding of how your personal data is collected, used, shared, and protected.

### **What personal data do we collect?**

At MyGlobalShield, we understand the importance of protecting your personal data, especially when it comes to handling sensitive information known as special category data. Special category data requires an additional supporting condition due to its sensitive nature, as it could potentially have a more detrimental impact on a data subject if it were to be lost, stolen, or accidentally shared.

When it comes to processing sensitive data, we follow a set of typical bases to ensure that we handle it appropriately. These bases include:

- Explicit consent
- Vital interests

- Information made public by the data subject
- Legal claims or judicial acts
- Reasons of substantial public interest (with a basis in law)
- Health or social care (with a basis in law)

We want to assure you that we will only process your special category personal data if we have an additional lawful basis to do so. This includes situations such as carrying out our legal obligations or exercising rights related to your application for cover with us.

In certain limited circumstances, we may approach you for your explicit written consent to process certain particularly sensitive data. If this occurs, we will provide you with full details of the information we require and the reason why we need it. This gives you the opportunity to carefully consider whether you wish to provide your consent.

Additionally, we may process your special category data without your consent if it is necessary for legal claims, protecting your interests or the interests of others, or if you have already made the information public.

We want to emphasize that we will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we ever need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

At MyGlobalShield, we are committed to maintaining transparency and ensuring the utmost protection of your personal data. If you have any concerns or questions about how we handle your personal data, please refer to our comprehensive privacy policy or contact our dedicated support team.

## **How do we use your personal data?**

At MyGlobalShield, we take the collection and processing of your personal data very seriously. We want to be clear with you about how we use your personal data and what lawful basis we rely on to process it. When processing your personal data, we must always have a valid reason to do so, known as a 'lawful basis.' We've detailed the different purposes for processing and the lawful basis we rely upon in the section below:

We process your personal data for the following purposes:

### **1. Communicating with you via our various channels**

We will use your personal data to communicate with you through various channels such as telephone, email, live chat, and social media. We rely on the lawful basis of contract and legitimate interests to process your personal data for this purpose.

### **2. Enhancing your experience and our products and services**

We collect and use your personal data to improve our business, products, services, and customer experience. We rely on the lawful basis of legitimate interests to process your personal data for this purpose. We also use carefully selected specialist service providers to carry out market research on our behalf to

ensure we deliver the best possible service to you.

### **3. Managing your enquiry, application, and ongoing account management**

We will use your personal data to manage your account, process your application, and respond to your enquiries. We rely on the lawful basis of contract and legitimate interests to process your personal data for this purpose.

### **4. Marketing our products and services**

If you have given your consent, we may use your contact details to send you marketing information about our products and services. You have the right to withdraw your consent at any time. We rely on the lawful basis of consent to process your personal data for this purpose.

### **5. Meeting our legal and regulatory obligations**

We are required to collect and use your personal data in certain circumstances to meet our legal and regulatory obligations. This includes complying with requirements set out by our regulators and relevant legislation such as Data Protection Legislation and Anti-Money Laundering Regulations. We rely on the lawful basis of legal obligation to process your personal data for this purpose.

### **6. Preventing and detecting fraud and financial crime**

We use your personal data to prevent and detect fraud and financial crime. We rely on the lawful basis of legitimate interests and legal obligation to process your personal data for this purpose. We may share your personal data with fraud prevention agencies and law enforcement agencies under certain circumstances.

### **7. Social media**

We use social media to communicate with you, keep you updated on our products and services, and better understand our customers. We rely on the lawful basis of legitimate interests to process your personal data for this purpose.

### **8. Testing our systems and processes**

We use your personal data to test our systems and processes to improve their performance and security. We rely on the lawful basis of legitimate interests to process your personal data for this purpose. We take the utmost care when processing your data and use only the minimum amount necessary for testing purposes.

## **How do we use special category data?**

At MyGlobalShield, we understand the sensitivity of special category data and only request it when absolutely necessary. We utilize this data in limited circumstances to better understand and meet your additional needs or requirements. For instance, we may use it to address any concerns related to your general wellness or to gather specific health details required for insurance policies or other relevant products.

## **Change in purpose**

We are committed to using your personal data solely for the purposes for which it was collected, unless we reasonably deem it necessary to use it for another compatible reason. In the event of using your personal data for an unrelated

purpose, we will notify you and provide an explanation of the legal basis that allows us to do so.

### **International data transfers**

As we offer insurance services to nomads, there are instances where we need to transfer your data internationally. While our main offices are located in Dover, Delaware, USA we have a global presence to effectively serve you.

Transferring your data internationally occurs under the following circumstances:

- When required or permitted by law or regulatory requirements.
- When sharing data with a third party to support the management of your cover.

To ensure the appropriate protection and control of your data, and compliance with data protection legislation, we take the necessary measures when working with suppliers and transferring personal data across borders. These measures may include:

- Transferring personal data to countries with comparable data protection legislation.
- Including suitable clauses in our contracts to ensure organizations take appropriate steps to comply with data protection laws or equivalent requirements.

### **Keeping your personal data secure**

At MyGlobalShield, we prioritize the security of your personal data and have implemented appropriate measures to prevent unlawful use, access, or accidental loss of your data. Access to your personal information is restricted to only those who have a genuine business need, and all data processing procedures are authorized and subject to a duty of confidentiality. Additionally, we have established protocols to promptly address and manage any suspected data security breaches, whereby we will notify you and the relevant regulator as required by law.

### **Sale or purchase of all or part of our business**

In the event of a sale or transfer of our business, we may share or transfer customer records and data. Before such an action, we will impose contractual obligations on the buyer/seller to ensure the security and confidentiality of your data.

### **How long does MyGlobalShield keep your data?**

Our goal is to retain your personal data only for the duration of our relationship and to fulfill legal and regulatory requirements. In determining retention periods, we consider multiple criteria such as:

- Maximum or minimum retention periods as per legal or regulatory guidelines.



- Our contractual rights and obligations.
- Customer expectations, the nature of your relationship with MyGlobalShield, your membership status, and the products and services you use.
- Current or future operational requirements.
- Forensic requirements necessitating access to data no longer actively used to address complaints and disputes.
- The risks involved in retention, deletion, and removal.
- The cost of maintaining, storing, archiving, and retrieving data.
- The capability or constraints of our systems and technology.

The below table delineates details of how long we will retain your data:

<b>Data type</b>	<b>How long we retain it for</b>
Name, title, sex, address	7 years after our relationship ends
Date of birth/age	7 years after our relationship ends
Nationality	7 years after our relationship ends
Occupation	7 years after our relationship ends
National Identifier Numbers, passport and driving license	7 years after our relationship ends
Email address and phone number	7 years after our relationship ends
Call recordings	3 years after our relationship ends
Family details, e.g., marital status, next of kin, dependents	7 years after our relationship ends
Geo location data	1 year after our relationship ends
How you interact with us	1 year after our relationship ends
Direct marketing preferences	Until you withdraw consent
Enquiries only	3 months

### **What rights do you have in relation to your personal data?**

At MyGlobalShield, we respect your rights when it comes to your personal data. Below is a list of your rights and how we protect them:

1. **Right to be informed** - You have the right to be informed about the collection and use of your personal data. This privacy policy is intended to provide you with this information.
2. **Right to access** - You have the right to access the personal data we hold about you. You can make a request for access by emailing us at [info@MyGlobalShield.com](mailto:info@MyGlobalShield.com). We will provide you with a copy of your personal data that we are processing and ensure that we are lawfully processing your data.
3. **Right to rectification** - You have the right to have any incomplete or

inaccurate personal data that we hold about you corrected.

4. **Right to erasure** - You have the right to request that we delete or remove personal data where we have no good reason for continuing to process it, or where you have exercised your right to object. To make such a request, please email us at [info@MyGlobalShield.com](mailto:info@MyGlobalShield.com).
5. **Right to object** - You have the right to object to the processing of your personal data where we rely on legitimate interests as the legal basis for processing. You can also object to direct marketing purposes. To make such a request, please email us at [info@MyGlobalShield.com](mailto:info@MyGlobalShield.com).
6. **Right to restrict processing** - You have the right to ask us to suspend the processing of your personal data where you want us to establish its accuracy or the reason for processing it. To make such a request, please email us at [info@MyGlobalShield.com](mailto:info@MyGlobalShield.com).
7. **Right to data portability** - You have the right to request a copy of some of your personal data from us in a structured, commonly used and machine-readable format. To make such a request, please email us at [info@MyGlobalShield.com](mailto:info@MyGlobalShield.com).
8. **Right to withdraw consent** - Where we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. To do so, please email us at [info@MyGlobalShield.com](mailto:info@MyGlobalShield.com). Please note that withdrawing consent will not affect any processing we have already done.
9. **Right to object to automated decision making/profiling** - You have the right to ask for an automated decision (such as a lending decision made by a machine) to be reviewed by a human. To make such a request, please email us at [info@MyGlobalShield.com](mailto:info@MyGlobalShield.com).
10. **Right to complain to the regulator** - You have the right to make a complaint to the Supervisory Authority if you feel that we have breached your data protection rights. You can get in touch with our Data Protection Officer (DPO) at [info@MyGlobalShield.com](mailto:info@MyGlobalShield.com) or refer to the regulatory authority responsible for investigating such complaints.

We request that you keep us informed of any changes in your personal details and kindly report any inaccuracies or discrepancies at the earliest opportunity. If you were referred to us by a broker or another intermediary who is also a data controller, please contact them separately. If you have any further questions on how we collect, use, share, or keep your personal data, please contact our DPO Emily Harper at [info@MyGlobalShield.com](mailto:info@MyGlobalShield.com).