

Introduction

HWI France (HWIF), a wholly owned subsidiary of Steadfast Group Holdings (UK) Limited strives to protect the privacy and the confidentiality of Personal Data that the company processes in connection with the services it provides to its clients. HWIF's services consist primarily of risk management and insurance broking, which enable the consideration of, access to, administration of, and making of claims on, insurance.

To arrange insurance cover and handle insurance claims, HWIF and other participants in the insurance industry are required to use and share Personal Data.

During the insurance lifecycle, HWIF will receive Personal Data relating to potential or actual policyholders, beneficiaries under a policy, their family members, claimants and other parties involved in a claim. Therefore references to "individuals" in this notice include any living person from the preceding list, whose Personal Data HWIF receives in connection with the services it provides under its engagements with its clients. This notice sets out HWIF's uses of this Personal Data and the disclosures it makes to other insurance market participants and other third parties.

Identity of the Data Controller and Contact Details

HWI France of 73 Boulevard Haussmann, 75008 Paris (**HWIF** or **We**) is the controller in respect of the Personal Data it receives in connection with the services provided under the relevant engagement with its client.

Personal Information that We Process

Individual Details – name, address (and proof of address), other contact details (eg email and telephone details), gender, marital status, family details, date and place of birth, employer, job title and employment history, relationship to the policyholder, insured, beneficiary or claimant);

Identification Details – identification numbers issued by government bodies or agencies (eg depending on the country you are in, social security or national insurance number, passport number, ID number, tax identification number, driver's licence number);

Financial Information – payment card number, bank account number and account details, income and other financial information;

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 formal physical or mental medical conditions, health status, injury or disability information, medical procedures performed, relevant personal habits (eg smoking or consumption of alcohol), prescription information, medical history;
- Criminal Records Data: criminal convictions, including driving offences; and
- Other Special Categories of Personal Data: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning an individual's sex life or orientation.

Policy Information – information about the quotes individuals receive and the policies they 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 Claims – information about previous claims, which may include health data, criminal records data and other special categories of Personal Data (as described in the Insured Risk definition above);

Current Claims – information about 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 Data – whether or not the individual has consented to receive marketing from us and/or from third parties; and

Website and Communication Usage – details of your visits to our website and information collected through cookie 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.

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 (depending on the service provided and country you are in):

- Individuals and their family members by telephone or in written correspondence, including email;
- Individuals' employers or trade or professional associations of which they are a member;
- In the event of 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 HWIF is 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;
- Claim forms;
- Open electoral registers and other publicly available information;
- Business information and research tools; and
- Third parties who introduce business to us

How We Use and Disclose Your Personal Data

In Appendix 1, we set out the purposes for which we use Personal Data, explain how we share the information and identify the “legal grounds” on which we rely to process the information.

These “legal grounds” are set out in the General Data Protection Regulation (GDPR) which allows companies to process Personal Data only when the processing is permitted by the specific “legal grounds” set out in the GDPR. The full description of each of the grounds are as follows:

For processing personal data and special categories of personal data	
Legal Ground	Details
Performance of our contract with you	Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject.
For our legitimate business interests	Processing is necessary for the purposes of legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. These legitimate interests are set out next to each purpose.
For processing personal data and special categories of personal data	
Your explicit consent	You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent, by contacting our Data Protection Officer, However, withdrawal of this consent may impact our ability to provide the services. For more detail see the Consent section below.
For legal claims	Processing is necessary for the establishment, exercise or defence of

	legal claims or whenever courts are acting in their judicial capacity.
Substantial public interest	Processing is necessary for reasons of substantial public interest, on the basis of EU or French law.

Please note that in addition to the disclosures, we have identified in the table at Appendix 1, we will disclose Personal Data for the purposes we explain in this notice to service providers, contractors, advisers, agents and HWI group companies that perform activities on our behalf.

Consent

In order to facilitate the provision of insurance cover and administer insurance claims, unless another legal ground applies, we rely on the data subject's consent to process special categories of Personal Data and criminal records data, such as medical and criminal convictions records, as set out in the table above. This consent allows us to 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 turns allows for the pooling and pricing of risk in a sustainable manner).

The affected individual's consent to this processing of special categories of Personal Data and criminal records data may be necessary for HWIF to be able to provide the services the client requests.

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.

Individuals may withdraw their consent to such processing at any time by contacting the Gerante using the contact details at the Accuracy, Accountability, Openness and Your Rights section below. However, doing so may prevent HWIF from continuing to provide the services to the relevant client. In addition, if an individual withdraws consent to an insurer's or reinsurer's processing of their special categories of Personal Data and criminal records data, it may not be possible for in the insurance cover to continue.

Safeguards

We have in place physical, electronic and procedural safeguards appropriate to the sensitivity 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. If appropriate, the safeguards include the encryption of communications, encryption of information during storage, firewalls, access controls, separation of duties and similar security protocols. We must restrict access to Personal Data to personnel and third parties that require access to such information for legitimate and relevant business purposes.

Limiting Collection and Retention of Personal Information

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 consent (or ask other parties to do so on HW IF's behalf) to process Personal Data for the new purposes.

Our retention periods for Personal Data are based on business needs and legal requirements. We retain Personal Data for as long as it is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When Personal Data is no longer needed, we either irreversibly anonymise the data (in which case we may further retain and use the anonymised information) or securely destroy the data.

Cross-Border Transfer of Personal Information

HWIF transfers Personal Data to, or permits access to Personal Data from, countries outside the European Economic Area (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.

Certain countries (insert link to EU website) have been approved by the European Commission as providing essentially equivalent protections as EEA data protection laws. EU data protection laws allow HWIF to freely transfer Personal Data to such countries.

If we transfer Personal Data to other countries outside the EEA, we will establish legal grounds justifying such transfer, model contractual clauses, individuals' consent or other legal grounds permitted by applicable legal requirements.

Individuals can request additional information about the specific safeguards applied to the export of their Personal Data.

Accuracy, Accountability, Openness and Your Rights

We strive to maintain Personal Data that is accurate, complete and current. Individuals should write to HWIF's Gerante as follows to update their information. Questions regarding HWIFs privacy practices should also be directed to the Gerante:

Mme Amanda HINDMAN
HWI France
73 Boulevard Haussmann
75008 Paris

Under certain conditions, individuals have the right to request that HWIF:

- Provide further details on how we use and process their Personal Data;
- Provide a copy of the Personal Data we maintain about the individual;
- Update any inaccuracies in the Personal Data we hold;
- Delete Personal Data that we no longer have a legal ground to process; and
- Restrict how we process the Personal Data while we consider the individual's enquiry.

In addition, under certain conditions, individuals have the right to:

- Where processing is based on consent, withdraw the consent;
- Object to any processing of Personal Data that HWIF justifies on the "legitimate interests" legal grounds unless our reasons for undertaking that processing outweigh any prejudice to the individual's privacy rights; and
- Object to direct marketing at any time.

These rights are subject to certain exemptions to safeguard the public interest (eg the prevention or detection of crime) and our interests, (eg the maintenance of legal privilege). We will respond to most requests within 30 days.

If we are unable to resolve an enquiry or a complaint, individuals have the right to refer to the financial ombudsman. More information on the financial ombudsman can be found at: www.mediation-assurance.org

Links to Third Party Websites

Our website may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. Please check these policies before you submit any personal information to such third party websites.

Changes to this Privacy Notice

This Privacy Notice is subject to change at any time. It was last changed on 28 February 2025. If we make changes to this Privacy Notice, we will update the date on which it was last changed. Where we have an engagement with you, we will notify you of any changes we make to this Privacy Notice in accordance with the notice provisions in the terms of our engagement. In other circumstances, we will publish the revised Privacy Notice on our website.

Purposes for which HWI France use Personal Data

Purpose of Processing	Legal Grounds	Disclosures
Quotation / Inception		
Establishing a client relationship, including fraud, anti-money laundering and sanctions checks	• Performance of our contract with the individual (if he/she is the client) • Compliance with a legal obligation • Legitimate interests of HWIF (to ensure that the client is within our acceptable risk profile and to assist with the prevention of crime and fraud) For processing special categories of Personal Data (eg health information) and criminal records data: • Consent • Substantial public interest	• Anti-fraud databases
Checking credit where we are taking any credit risk	• Legitimate interests of HWIF (to ensure that the client is within our acceptable risk profile and to assist with the prevention of crime and fraud)	• Credit reference agencies
Evaluating the risks to be covered and matching to appropriate insurer, policy and premium	• Performance of our contract with the individual (if he/she is the client) • Legitimate interests of HWIF (to determine the likely risk profile and appropriate insurer and insurance product) For processing special categories of Personal Data (eg health information) and criminal records data: • Consent • Substantial public interest	• Insurers • Insurance intermediaries such as brokers
Policy Administration		
General client care, including communicating with clients	• Performance of our contract with the individual (if he/she is the client) • Legitimate interests of HWIF (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) For processing special categories of Personal Data (eg health information) and criminal records data: • Consent • Substantial public interest	• Insurers
Collection of refunding of premiums, paying on claims, processing and facilitating other payments	• Performance of our contract with the individual (if he/she is the client) • Legitimate interests of HWIF (to recover debts due to us)	• Insurers • Banks • Debt recovery providers
Facilitating premium finance arrangements	• Performance of our contract with the individual (if he/she is the client) • Legitimate interests of HWIF (ensuring our clients are able to meet their financial obligations)	• Premium finance providers • Banks

Claims Processing		
Managing insurance claims	• Performance of our contract with the individual (if he/she is the client) • Legitimate interests of HWIF (to assist our clients in assessing and making claims) For processing special categories of Personal Data (eg health information) and criminal records data: • Consent • Substantial public interest	• Insurers • Claims handlers • Lawyers • Loss Adjusters • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals
Defending or prosecuting legal claims	• Performance of our contract with the individual (if he/she is the client) • Legitimate interests of HWIF (to assist our client in assessing and making claims) For processing special categories of Personal Data (eg health information) and criminal records data: • To establish, defend or prosecute legal claims	• Insurers • Claims handlers • Lawyers • Loss adjusters • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals
Investigating and prosecuting fraud	• Performance of our contract with the individual (if he/she is the client) • Legitimate interests of HWIF (to assist with the prevention and detection of fraud) For processing special categories of Personal Data (eg health information) and criminal records data: • To establish, defend or prosecute legal claims • Consent • Substantial public interest	• Insurers • Lawyers • Police • Experts • Other insurers • Anti-fraud databases • Third parties involved in the investigation or prosecution, such as private investigators
Renewals		
Contacting you in order to arrange the renewal of the insurance policy	• Performance of our contract with the individual (if he/she is the client) • Legitimate interests of HWIF (to correspond with clients to facilitate the continuation of insurance cover)	• Insurers • Insurance intermediaries such as brokers
Throughout the Insurance Lifecycle		
Marketing analytics and direct marketing including data anonymisation	• Legitimate interests of HWIF (to give clients relevant offers) • Where we do not have an existing relationship with the individual, consent	• Insurers • Group companies
Transferring books of business, company sales and reorganisations	• Legitimate interests of HWIF (to structure our business appropriately) For processing special categories of Personal Data (eg health information) and criminal records data: • Consent	• Group companies • Courts • Purchaser (potential and actual)
General risk modelling	• Legitimate interests of HWIF (to build risk models that allow placing of risk with appropriate insurers) For processing special categories of Personal Data (eg health information)	

	and criminal records data: • Consent	
Complying with our legal or regulatory obligations	• Compliance with a legal obligation • Legitimate interests of HWIF (to take pre-emptive steps to ensure legal and regulatory compliance) For processing special categories of Personal Data (eg health information) and criminal records data: • To establish, defend or prosecute legal claims • Consent	• Insurance, data protection and other regulators • Police • Insurers • Auditors
Consultancy Activities		
General client care, including communications with clients	• Performance of our contract with the individual (if he/she is the client) • Legitimate interests of HWIF (to correspond with the clients in order to provide consultancy services) For processing special categories of Personal Data (eg health information) and criminal records data: • Consent	
General risk modeling in the context of our consultancy services in order to evaluate risk and provide advice	• Legitimate interest of HWIF (to build risk models and assess the risks and necessary cover) For processing special categories of Personal Data (eg health information) and criminal records data: • Consent	
Analysis as part of the specific consultancy advice	• Legitimate interests of HWIF (to provide the agreed consultancy services to its clients) For processing special categories of Personal Data (eg health information) and criminal records data: • Consent	
Complying with our legal or regulatory obligations in the consent of our consultancy business	• Compliance with a legal obligation • Legitimate interests of HWIF (to take pre-emptive steps to ensure legal and regulatory compliance) For processing special categories of Personal Data (eg health information) and criminal records data: • To establish, defend or prosecute legal claims • Consent	• Insurance, data protection and other regulators • Police • Insurers • Auditors
Website Activities		
To monitor your interaction with the website to ensure service quality, compliance with procedures and to combat fraud	• Compliance with a legal obligation • Legitimate interests of HWIF (to ensure the quality and legality of our online services) For processing special categories of Personal Data and criminal records data: • Substantial public interests	• Third parties undertaking online monitoring • Anti-fraud databases
To ensure the website content is relevant and presented in the most effective manner for you and your device	• Legitimate interests of HWIF (to provide clients, beneficiaries and claimants with content and services on the website)	

