

## Data Privacy Notice

This notice describes how CLSRS, as a data controller, collects, uses, shares and retains the personal information You provide and informs You about Your choices regarding use, access and correction of Your personal information. CLSRS is committed to ensuring that any personal data it receives is protected and handled in accordance with applicable data protection laws. In this Privacy Notice, “We”, “Us” and “Our” refers to CLSRS. "CLSRS" means the following companies: CLS Risk Solutions Limited registered in Malta with company number C77678, authorised and regulated by the Malta Financial Services Authority (“MFSA”).

This Privacy Policy is separate from and not intended to override the terms of any contract We have with You or Your rights under data protection laws.

When We say, “You” and “Your” in this notice, We mean anyone whose personal information We may collect, including:

- Anyone seeking a quote from Us or whose details are provided during the quotation process
- Anyone placing an order for a product with Us
- Policyholders and anyone named on or covered by the policy
- Anyone who may benefit from or be directly involved in the policy or a claim, including claimants and witnesses.

### Collection of data

- CLSRS may collect a range of personal and business information supplied by You or third parties on Your behalf. Wherever We collect or use personal information, We will make sure We do this for a valid legal reason. This information may include the following: basic personal details such as Your name, address, telephone number, gender, marital status, financial details, identification checks and background information, credit history, credit score, sanctions check results, information received from various anti-fraud databases and additional information about Your order or account requirements, such as details of Your Business.
- CLSRS may also collect data about You, Your business or the property for which the order is placed from a number of different sources, including but not limited to the electoral roll, third party databases available, other insurance or property search firms, loss adjusters and/or other parties involved in the process of administering a claim, as well as publicly available sources.

We will always attempt to explain clearly when and why We need this information and the purposes for which We will use it and where necessary, We will obtain Your explicit consent to use personal data.

We may record or monitor telephone calls in order to ensure accuracy in the recording of instructions communicated to Us, to facilitate staff training, for the prevention of fraud, for management of complaints and to improve customer satisfaction.

You can visit our site without providing Us with any information about yourself. You do not have to provide Us with any personal information, but if You do not provide the information that We need, We may not be able to proceed with Your account registration, order or any claim that You may make.

We do log Your IP address (the Internet address of Your computer) to provide Us with an idea of which part of the site You visit and how long You spend there.

We do not use IP addresses for identification purposes. We also log the computer, operating system and browser type that You are using. This information is automatically provided by Your browser.

Our website does not enable our visitors to communicate with other visitors or to post information to be accessed by others.

The website operated by CLS may provide links to other sites. When You click on one of these links Your browser will download pages from the other site. You should satisfy yourself that You are comfortable with the privacy policy adopted by any site You visit. CLS supports and advocates ethical policies with regards to privacy and data protection but cannot be held responsible for the actions of any other site.

Although We take reasonable steps to validate links, such links are for information only and do not represent any undertakings as to the availability, merits or behaviour of any site or organisation.

## **“Cookies”**

Sometimes it is useful for the CLS web site to remember You when You come back to the site. The way We do this is by storing a small file on Your computer, known as a "cookie" which can only be seen by the CLS website and will not expose You to any security risk. A cookie is perfectly safe and doesn't affect the performance of Your computer in any way but it does mean that if You are using the same computer We can recognise You when You come back to our site.

We do not use cookies to store personal data nor do We link non-personal information stored in cookies with personal data about specific individuals.

## **Personal data about others**

We may collect data about other individuals, such as employees, clients, family, or members of Your household. If We do, We will obtain their explicit consent to use this data. If You give Us information about another person, it is Your responsibility to ensure and confirm that You have told that person why and how CLS uses personal data and that You have that person's permission to provide that data to us and for us to process it.

## **Our uses of data**

CLS uses the data We collect to operate Our business and provide the products we offer. The information We collect may be used for (amongst other purposes) the following: to assess Your application for an account, quote or product; to evaluate the risk You present; to verify Your identity; to administer Your order and deliver our products; to conduct statistical analysis for pricing purposes; to administer claims; and to investigate and resolve complaints.

Should the need arise, CLS may also use data for the following purposes: to collate Your Policy or claims history; to undertake credit referencing or credit scoring and to assist with financial crime and fraud detection.

## **Sharing Your data**

If You request a quote, or purchase a product, Your personal information may be shared with and processed by a number of third parties which include but are not limited to regulatory, dispute resolution or law enforcement bodies; other insurance organisations including reinsurers; fraud prevention and credit reference agencies (who may keep a record of the search); or other relevant third parties within Our administrative structure or with prospective buyers or purchasers in the event CLS wishes to sell all or part of its business.

Your data may be disclosed when We believe in good faith that the disclosure is required by law; necessary to protect the safety of Our employees or the public; required to comply with a judicial proceeding, court order or legal process; or for the prevention or detection of crime (including fraud).

We will only share Your information in compliance with data protection laws.

## **Transfer and Storage of Your Data Overseas**

Personal details may be transferred to countries outside the EEA. They will at all times be held securely and handled with the utmost care in accordance with all applicable principles of Maltese law. Personal details will not be transferred outside the EEA unless the transfer is to a country which is considered to have equivalent standards with regard to data protection, or We have taken reasonable steps to ensure that suitable data protection standards are in place.

## **Data Retention**

CLS will only keep data for as long as it is necessary to continue providing our products and services to You and/or to fulfil our legal and regulatory obligations in line with Our data retention policy.

## **Data Subject Rights**

You have a number of rights in relation to the information We hold about You. These include: the right to object to the use of Your personal information to the right to ask for a copy of the personal information We hold about You, subject to certain exemptions; the right to ask Us to update or correct Your personal information to keep it accurate; the right to withdraw any permission You have previously provided; the right to ask Us to delete Your personal information from our records if it is no longer needed for the original purpose; the right to ask Us to restrict the use of Your personal information in certain circumstances; and the right to complain about how We handle Your data (see 'Who to contact' below).

Please note that there are times when We will not be able to delete Your information. This may be as a result of a requirement to fulfil Our legal and regulatory obligations, or where there is a minimum statutory period of time for which We have to keep Your information. If We are unable to fulfil a request We will always let You know our reasons.

We will always attempt to explain clearly when and why We need this information and the purposes for which We will use it and where necessary, We will obtain Your explicit consent to use personal data.

### Who to contact

If You wish to exercise any of Your rights, or have any queries about how We use Your personal information, please contact our Compliance Officer at: CLS Risk Solutions Limited, Development House, St. Anne Street, Floriana FRN 9010, Malta or by email: [compliance@clsrs.eu](mailto:compliance@clsrs.eu) or by telephone: +356 279 22200

We will consider Your request and either comply with it or explain why We are not able to. Please note, We may request evidence of Your identity to process Your request.

If You are not happy with any aspect of how We handle Your data, We encourage You to come to Us in the first instance but You are entitled to complain to the Office of the Information and Data Protection Commissioner (IDPC). Find out on the IDPC website how to [send a complaint.:](https://idpc.org.mt/en/Pages/contact/complaints.aspx) <https://idpc.org.mt/en/Pages/contact/complaints.aspx>

[Details of the IDPC are as follows:](#)

### Address

Information and Data Protection Commissioner

Level 2, Airways House

High Street

Sliema SLM 1549

Malta

### Telephone

(+356) 2328 7100

### Email

[idpc.info@idpc.org.mt](mailto:idpc.info@idpc.org.mt)

### Changes to this Data Privacy Notice

We may amend this Data Privacy Notice from time to time for example, to keep it up to date or to comply with legal requirements. Should any significant changes be made to the ways in which CLSRS processes data from those described at the time of collection, We will post a notice on Our website.