

# DATA PROTECTION AND PRIVACY NOTICE – UTMOST WORLDWIDE (DIFC) LIMITED

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The purpose of this Data Protection and Privacy Notice is to inform you of your statutory rights and the protections available to you in relation to your Personal Data when it is provided to Utmost Worldwide (DIFC) Limited ("Utmost Worldwide DIFC") and to provide further information on how we use your Personal Data.

Personal Data is any information relating to you as an identifiable individual, and if your Personal Data has been provided to Utmost Worldwide DIFC, you are entitled to the statutory rights and protections afforded by DIFC Law Number 5 of 2020 (the DIFC Data Protection Law).

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The Utmost Worldwide Limited is incorporated in Guernsey under Company Registration No. 27151 and regulated in Guernsey as a Licensed Insurer by the Guernsey Financial Services Commission under the Insurance Business (Bailiwick of Guernsey) Law, 2002 (as amended).

Registered Head Office: Utmost House, Hirzel Street, St Peter Port, Guernsey, Channel Islands GY1 4PA. T +44 (0) 1481 715 400 F +44 (0) 1481 715 390 E [UWCustomerService@utmostworldwide.com](mailto:UWCustomerService@utmostworldwide.com)

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## 1. HOW WE USE YOUR PERSONAL DATA

Utmost Worldwide DIFC will collect and process your Personal Data lawfully and fairly to the extent necessary for the fulfilment of our contractual obligations with you, or the legal entity that you represent as the case may be.

In the case of employees of Utmost Worldwide DIFC, Personal Data will be collected and processed in order to fulfil the terms of the relevant employment contract.

We also reserve the right to further process Personal Data where we consider it necessary to protect the vital interests of the individual concerned, such as in a medical emergency or where we are compelled under applicable law.

In processing your Personal Data, Utmost Worldwide DIFC must comply with the applicable Data Protection Laws and the associated Data Protection Principles that are set out in the Appendix to this Data Privacy Notice.

Should Utmost Worldwide DIFC need to use Personal Data that is classified by law as a special category of 'Sensitive Personal Data', then the reasons will be explained to you in writing and your specific consent will be required. You may withdraw such consent at any time by providing us with written notice.

'Sensitive Personal Data' is defined as data revealing racial or ethnic origin, religious, political or philosophical beliefs, genetic, biometric, health data or data concerning an individual's sexual orientation.

We will not collect or retain more Personal Data than we need in order to meet our obligations under our contractual relationship, or as may be required by applicable law and regulation.

## 2. HOW WE STORE YOUR PERSONAL DATA

Personal Data records held by us will typically comprise, but not be limited to hard copy documents, scanned documents, transaction information, email communications, telephone voice recordings where applicable and CCTV images (if you visit our premises), that are stored on electronic and/or physical systems.

All Personal Data is held by us on a strictly confidential basis but may be transferred or disclosed by us in the following circumstances:

- Between members of the Utmost Group for management and governance purposes
- To our service providers, meaning any agent, contractor or third-party service providers
- To statutory authorities where appropriate. Any disclosure will be limited to the extent as may be required for us to comply with applicable law

We are required to hold your Personal Data for a period of up to 10 years after the contractual relationship ceases, which we deem to be necessary to meet our statutory and regulatory obligations. Your Personal Data will not be retained for longer than is necessary and it will be erased or otherwise put beyond use when it is no longer required.

### 3. YOUR DATA PROTECTION RIGHTS

As the subject of Personal Data that has been provided to Utmost Worldwide DIFC, you are provided with the following rights of data protection:

Your Statutory Rights	Our commitment to your rights
<p><b>The right to information regarding the processing of Personal Data when collected from the data subject.</b></p> <p><i>You are entitled to certain information about the intended use of your Personal Data when providing that data to an organisation.</i></p>	<p>When Personal Data is collected from you, you will be provided with clear and concise information regarding the intended use of your Personal Data, your rights as a data subject, our official contact details and the contact details of our Senior Executive Officer.</p>
<p><b>The right to information regarding the processing of Personal Data when collected indirectly from the data subject.</b></p> <p><i>Where your Personal Data is provided indirectly to an organisation, you are entitled to the same rights and information as other data subjects.</i></p>	<p>Where your Personal Data is provided to us by a third party on your behalf, you are entitled to the same information and rights as other data subjects.</p>
<p><b>The right to non-discrimination</b></p> <p><i>Where you exercise your rights as a Data subject</i></p>	<p>Utmost Worldwide DIFC may not discriminate against you following exercise of your rights as a Data Subject due to your exercising of your legal rights.</p>
<p><b>The right of access to the Personal Data of the data subject (subject to relevant exceptions).</b></p> <p><i>You are entitled to know what Personal Data is recorded about you.</i></p>	<p>We will ordinarily provide a schedule of your Personal Data that is held by us upon request.</p> <p>You are not ordinarily entitled to receive copies of our documentation, particularly where this may disclose the Personal Data of other individuals, but we may choose to provide you with such copies of documents at our sole discretion.</p> <p>Please note: We can only provide data relating to recorded telephone calls or CCTV images (where applicable) if you provide the date and approximate time of the relevant interaction. In addition, we are not required to respond to requests for Personal Data that we consider to be frivolous, vexatious, unnecessarily repetitive or excessive.</p>
<p><b>The right to data portability.</b></p>	<p>In the event that a right to data portability arises, we will provide you with details of your relevant Personal Data in portable format. It should be noted that the 'right to data portability', is a limited right</p>

<p><i>You might be entitled to receive your Personal Data from us in a portable format.</i></p>	<p>and is only valid when Personal Data is being processed by automated means.</p>
<p><b>The right to rectification.</b></p> <p><i>You are entitled to require the rectification of any Personal Data that is inaccurate, incorrect or recorded in error.</i></p>	<p>If you become aware or suspect that any Personal Data held by us is inaccurate, incorrect, incomplete or recorded in error, you should inform our Senior Executive Officer in writing and we will make such corrections, changes or additions as soon as it is practicable.</p>
<p><b>The right to restriction of processing.</b></p> <p><i>Where you wish to dispute the accuracy or integrity of Personal Data held about you, you are entitled to require the organisation to restrict the processing of that data until the issue is resolved.</i></p>	<p>Where you wish to dispute the accuracy or integrity of the Personal Data that we hold about you, please notify our Senior Executive Officer in writing. If we do not agree to amend or remove the Personal Data in question, we will inform you of the reasons and restrict the processing of that data until the issue has been resolved.</p>
<p><b>The right to data erasure.</b></p> <p><i>You are entitled to have your Personal Data erased or otherwise put beyond use when we no longer have a need to use it.</i></p>	<p>We are required by law to hold your Personal Data during the lifetime of contractual relationship with you or the organisation that you represent and for a period of 10 years after that contractual relationship ceases, which we deem to be necessary to meet our statutory and regulatory obligations. Your Personal Data will not be retained for longer than is necessary and it will be erased or otherwise put beyond use when it is no longer required.</p>
<p><b>The right not to be subject to decisions based on automated processing.</b></p> <p><i>You are entitled to know if your Personal Data is used in any automated decision making process.</i></p>	<p>We do not currently utilise any Personal Data for automated decision making processes.</p>
<p><b>The right to object to processing on grounds of public interest, historical or scientific purposes.</b></p> <p><i>In certain circumstances, you may object to your Personal Data being retained or disclosed for public interest, historical or scientific purposes.</i></p>	<p>We do not currently hold or expect to hold Personal Data that is likely to be of public interest, or of historical or scientific importance. If you have provided Personal Data to us that you think may fall into these categories, please notify our Senior Executive Officer in writing.</p>
<p><b>The right to be notified of rectification, erasure and restrictions.</b></p> <p><i>You are entitled to be informed when your Personal</i></p>	<p>We will ordinarily confirm to you in writing when any rectification, erasure or restrictions have been carried out at your request.</p>

<p><i>Data has been rectified, erased or restricted.</i></p>	
<p><b>Who is responsible for managing and controlling my Personal Data?</b></p>	<p>The data controller of your Personal Data is:</p> <p>Utmost Worldwide (DIFC) Limited Office 17 31, Central Park Towers DIFC, Dubai, PO Box 507215</p>
<p><b>Do you have a Data Protection Officer that I can contact?</b></p>	<p>Due to the limited scope of processing of personal data, Utmost Worldwide DIFC has determined that appointment of a Data Protection Officer is not necessary under clause 16 of DIFC Law Number 5 of 2020. The Senior Executive Officer therefore acts in this capacity and can be contacted at:</p> <p><a href="mailto:derek.gemmell@utmostworldwide.com">derek.gemmell@utmostworldwide.com</a></p>
<p><b>What is the purpose and legal basis for processing my Personal Data?</b></p>	<p>Your Personal Data will be collected and processed only in connection with fulfilling a contract with Utmost Worldwide DIFC. If we wish to use your Personal Data for any other purpose, we will advise you and seek your prior written consent.</p>
<p><b>How can I complain about data protection issues?</b></p>	<p>If you are dissatisfied with the manner in which your Personal Data is processed by Utmost Worldwide DIFC, then you should lodge a complaint in the first instance with the Senior Executive Officer.</p> <p>You are also entitled to lodge a complaint or an appeal against a decision made by Utmost Worldwide DIFC by directly contacting the Data Protection Commissioner at:</p> <p>Level 14, The Gate, DIFC, PO Box 74777, Dubai, UAE</p>
<p><b>Does my Personal Data get transferred to other Offices of the Utmost Group in Guernsey or elsewhere?</b></p>	<p>Your Personal Data may be transferred to Utmost Worldwide Limited, which is our parent entity in Guernsey, our other affiliates of the Utmost Group, but only where this is required to manage or oversee the relevant contractual relationship.</p> <p>Guernsey is deemed to operate Data Protection Laws that are equivalent to the Dubai International Financial Centre, and any Personal Data processed in Guernsey is protected by the Data Protection (Bailiwick of Guernsey) Law, 2017 which is also equivalent to Regulation (EU) 2016/679, the General Data Protection Regulation or "GDPR".</p>

If you have any queries regarding this Data Privacy Notice, please contact our Senior Executive Officer.

Utmost Worldwide (DIFC) Limited, Incorporated in the Dubai International Financial Centre, registered no. 3249. Registered Office: 17 31, Central Park Towers, DIFC, Dubai, UAE, PO Box 507215. Licensed and regulated by the Dubai Financial Services Authority.