

Data Protection and Client Confidentiality Policy

1. PRE-AMBLE

Seven Insurance Brokers LLC needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organization has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards – and to comply with the law.

WHY THIS POLICY EXISTS

This data protection ensures Seven Insurance Brokers:

- Complies with data protection laws and regulations and follows good practice.
- Protects the rights of staff, customers and partners.
- Is open about how it stores and processes individuals' data.
- Protects itself from the risks of a data breach.

2. DATA PROTECTION LAW

The Insurance Authorities and regulators, locally and abroad, describe how organizations – including Seven Insurance Brokers must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with these requirements, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

Data protection is underpinned by the following important principles. These say that personal data must:

- 1. Be processed fairly and lawfully
- 2. Be obtained only for specific, lawful purposes
- 3. Be adequate, relevant and not excessive
- 4. Be accurate and kept up to date
- 5. Not be held for any longer than necessary
- 6. Processed in accordance with the right of data subjects
- 7. Be protected in appropriate ways.

3. POLICY SCOPE

The policy applies to:

- The head office of Seven Insurance Brokers
- All branches of Seven Insurance Brokers
- All staff and volunteers of Seven Insurance Brokers
- All contractors, suppliers and other people working on behalf of Seven Insurance Brokers

It applies to all data that the company holds relating to identifiable individuals. This can include:

- Names of individuals.
- Postal addresses.
- Email addresses.
- Telephone numbers.
- ...plus any other information relating to individuals.

4. DATA PROTECTION RISKS

This policy helps to protect Seven Insurance Brokers from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.

- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

5. RESPONSIBILITIES

Everyone who works for or with Seven Insurance Brokers has responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The Management Board is ultimately responsible for ensuring that Seven Insurance Brokers meets its legal obligations.
- The Data Protection Officer is responsible for:
 - o Keeping the board updated about data protection responsibilities, risks and issues.
 - o Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - o Arranging data protection training and advice for the people covered by this policy.
 - o Handling data protection questions from staff and anyone else covered by this policy
 - o Dealing with requests from individuals to see the data Seven Insurance Brokers holds about them (also called 'subject access requests')
 - o Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- The IT Manager, is responsible for:
 - o Ensuring all systems, services and equipment used for storing data meet acceptable security standards.

- o Performing regular checks and scans to ensure security hardware and software is functioning properly
- o Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
- o Approving any data protection statements attached to communications such as emails and letters.
- o Addressing any data protection queries from journalists or media outlets like newspapers.
- o Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.
- All the above functions and responsibilities related to the individual roles shall at all times be executed and liaised with Seven Insurance Brokers' Compliance Manager, Internal Controller and Head of Legal.

6. GENERAL STAFF GUIDELINES

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- Seven Insurance Brokers will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.
- Personal data should not be disclosed to unauthorized people, either within the company or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.
- New users to the system must be approved by the Data Protection Officer. Likewise access of resigned users shall be terminated immediately.

7. DATA STORAGE

These rules describe how and where data should be safely stored.

When data is stored on paper, it should be kept in a secure place where unauthorized people cannot see it:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorized people could see them, like on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorized access, accidental deletion and malicious hacking attempts.

- Data should be protected by strong passwords that are changed regularly and never share among employees.
- If data is stored on removable media (like CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers, and should only be uploaded to approved cloud computing services.
- Servers containing personal data should be sited in a secure location, away from general office space.
- Data should be backed up frequently. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.

8. DATA USE

Personal data is of no value to Seven Insurance Brokers unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.

- Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be encrypted before being transferred electronically. The IT manager can explain how to send data to authorized external contacts.
- Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data.

9. DATA ACCURACY

It is imperative that Seven Insurance Brokers takes reasonable steps to ensure data is kept accurate and up to date.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call.
- Seven Insurance Brokers will make it easy for data subjects to update the information Seven Insurance Brokers hold about them. For instance, via the company website.
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

10. SUBJECT ACCESS REQUESTS

All individuals who are the subject of personal data held by Seven Insurance Brokers are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the company is meeting its data protection obligations.
- Be entitled to have their information removed from the data base, upon such request.

If an individual does contact the company requesting this information, this is called a subject access request.

Subject access request from individuals should be made by email, addressed to the Data Protection Officer, who will aim to provide the relevant data within 14 days.

The Data Protection Officer will always verify the identity of anyone making a subject access request before handing over any information.

11. DISCLOSING DATA FOR OTHER REASONS

In certain circumstances, Seven Insurance Brokers may allow personal data to be disclosed to law enforcement agencies, without the consent of the data subject.

Under these circumstances, Seven Insurance Brokers will disclose requested data. However the Data Protection Officer will ensure the request is legitimate, seeking assistance from the Management Board and from the company's legal advisor where necessary.

12. PROVIDING INFORMATION

Seven Insurance Brokers aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used.
- How to exercise their rights.

To these ends, the company has this privacy statement, setting out how data relating to individuals is used by the company:

- In the normal scope and course of business Seven Insurance Brokers shall only use the client data for the reason and exclusive purpose it was provided for by the client, namely to render a legal service to the client.
- Save as set out above, Seven Insurance Brokers shall not disclose any such data or information held by it to any third party, in particular to the client's own employer, without the express and written consent of the client first being obtained.

13. GENERAL

- This Data Protection Policy forms an integral part of the following documents relating to Seven Insurance Brokers in relationship with all its employees and must be read in conjunction with:
 - o Employment Contract.

- o Code of Conduct.
- o Staff Handbook.
- In particular, this Data Protection Policy will be circulated to all employees of Seven Insurance Brokers who will individually be required to state that they have read the contents and understand its terms, and that they will abide by it. A physical or electronic copy of this signed statement shall be retained by Seven Insurance Brokers on each employee's personnel file.
- Notice of the existence of Seven Insurance Brokers' Data Protection Policy shall appear clearly on its website and be easily accessible to all customers electronically. This must also be brought to the attention of prospective client/s at the first available opportunity or contact.

WHO WE ARE

Seven Insurance Brokers is a financial services group offering independent advice to help its clients understand, protect and build their assets. Seven Insurance Brokers offers products across the entire financial services marketplace, providing the widest possible choice.

+971 4 436 1800

+971 2 406 9614

info@seveninsurancebrokers.com

Office 1912, 19th Floor

Concord Tower

Dubai Media City,

Dubai, United Arab Emirates,

PO Box 214909