



Privacy Policy

Who are we?

HDI Global Specialty SE is an insurance company registered in Germany. HDI Global Specialty SE – Canadian branch (“HSCB”) is authorized in Canada by the Office of the Superintendent of Financial Institutions. HSCB wants you to be aware of how we collect, use, protect and disclose your personal information. This Privacy Policy (“Privacy Policy”) applies to all associated services provided by HSCB.

Policy statement

HDI Global Specialty SE (including its Branches) is committed to treating customers fairly by placing them at the heart of what it does and providing the highest standard of products and services. HSCB is committed to ensuring that all customer personal information is handled in accordance with the Personal Information Protection and Electronic Documents Act (“PIPEDA”) and, where applicable, with provincial privacy legislation in Alberta, British Columbia and Quebec (collectively: “Canadian Privacy Laws”). As a Branch of HDI Global Specialty SE, HSCB also complies with the EU General Data Protection Regulation (“GDPR”).

What types of personal information do we collect?

HSCB collects personal information, including sensitive information. “Personal information” means information about an identifiable individual. Personal information does not include business contact information such as an employee’s name, title, business address, telephone number or email addresses that is collected, used or disclosed solely for the purpose of communicating with that person in relation to their employment or profession. “Sensitive information” is personal information and includes information about an individual’s health, genetics, race, political opinion or membership, religion, philosophical beliefs, union membership, sexual orientation and/or criminal record. While some information will always be considered sensitive information (i.e. medical records and income records), any information can be considered sensitive depending on the context. HSCB will assess whether the personal information provided is sensitive information at the time of collection.

Examples of the types of personal information which HSCB collects includes, but is not limited to, name, address and contact details, date of birth, gender, health information, claims history, criminal records, and credit history records.

Collecting your personal information

We limit the collection and use of personal information to what we require in order to serve you as a customer and to administer our business, including to:

- Assess applications for insurance;
- Administer insurance policies;
- Investigate, adjust or settle claims;
- Defending or prosecuting claims, legal proceedings or regulatory proceedings;
- Detect, prevent and suppress fraud, authorized, or illegal activities; and,
- Comply with applicable laws and requirements of regulators, including self-regulatory organizations.

We collect this information in a number of ways. Sometimes we will collect this information directly from you. However, we typically collect this information from agents, insurance brokers and other insurance intermediaries.

Consent

HSCB will obtain your consent to collect, use, disclose and/or share your personal information, subject to specified exceptions contained in Canadian Privacy Laws. Your consent may be obtained in different ways depending on the situation: implied consent or express consent. Your implied consent is obtained when you approach us to obtain information about an insurance product, inquire about or apply for insurance products or services from us, and through your use of our insurance product(s). Your express consent – which may be obtained verbally, in writing or online – is required to collect sensitive information, which could occur during a claims process.

If you provide us with personal information about another person, we expect you to ask for their permission to do this and consent to our privacy policy on their behalf.

You may withdraw your consent to the collection, use and disclosure of your personal information, subject to certain limitations. However, if you do so, we may not be able to continue to provide you with our insurance products and services. If you wish to withdraw your consent, please contact our Privacy Officer.

Automated Processing

HSCB may, in limited circumstances, automatically process your personal information to render a decision with respect to an insurance product. You have the right to request the personal information used to render such a decision; the reasons and the principal factors and parameters that led to the decision; and the right to correct any mistakes in the personal information used to render such a decision. Further, you have the right to submit observations to an employee of HSCB who is in a position to review the decision that was based on automatic processing of your personal information.

Using and disclosing your personal information

We can only collect, use and disclose your personal information for the purpose it was collected, unless the use or disclosure for another purpose is with your consent or otherwise permitted by law.

We may disclose your personal information to:

- Our related corporate entities for the purpose of performing our functions or corporate reporting. These related entities may be located overseas in any of the countries in which HDI Global Specialty SE operates including, but not limited to, Germany, the United Kingdom, the Netherlands, Denmark, Italy, Sweden, and Australia.
- Service providers and third parties to carry out activities on our behalf such as underwriting services, claims handling services or providing IT services to us.
- Other entities within our group, reinsurers (who may be located overseas), insurance intermediaries, credit reference agencies, our advisors, our agents, our administrators and those involved in the claims handling process (including assessors, investigators and others), for the purpose of assisting us and them in providing relevant services and products, or for the purpose of recovery or litigation.
- People listed as co-insured on your policy and to family members or agents authorized by you.

When disclosing your personal information to any third parties, HSCB requires the third parties, as part of their contracts with HSCB, to maintain your confidentiality and may not use your information for any unauthorized purpose. HSCB requires them to protect and handle your personal information in a manner consistent with our privacy practices and all applicable privacy laws.

Protecting your personal information

We hold your personal information on databases and physical files. We take all reasonable steps to securely retain any information we hold (including the use of passwords and other security measures). We also maintain security procedures to manage and protect the use and storage of paper records containing personal information.

Access to your personal information

You have the right to access your personal information under our control, subject to any legal restrictions or rights of refusal. If you exercise this access right, we may charge you a reasonable fee for copying and sending the information from your file.

You also have the right to challenge the accuracy and completeness of the personal information we hold about you. All requests to access or amend your personal information must be made in writing.

Your rights

In certain circumstances, you may have the right to require us to:

- Provide you with further details about the use we make of your personal information;
- Provide you with a copy of the personal information we hold;
- Amend any inaccuracies in the personal information we hold;
- Delete any personal information we no longer have any lawful ground to use;
- Where the processing requires your consent, to withdraw that consent so we stop the processing in question; and
- Require us to cease disseminating your personal information or to de-index any hyperlink attached to your name that provides access to the information by technological means where the dissemination of the personal information contravenes the law or a court order, or otherwise causes serious injury to the individual's reputation or privacy (for individuals located in Quebec).

In certain circumstances we may need to restrict the above rights to safeguard the public interest (e.g. prevention or detection of crime) or our interests (e.g. legal or litigation privilege). If we must restrict your rights, we will explain why in writing.

Complaints and contact information

If you wish to contact us about the handling of your personal information, accessing or correcting your information, or to make a complaint, please contact:

Privacy Officer
HDI Global Specialty SE – Canadian Branch
130 Adelaide Street West, Suite 3400
Toronto, ON M5H 3P5
E-mail address: PrivacyCanadaBranch@hdi-specialty.com

Complaints made regarding our privacy policy or the handling of your personal information will be addressed pursuant to our complaints handling policy.

If you have a concern we are not able to resolve, you have the right to contact your privacy regulator. Upon request, our Privacy Officer will provide you with the relevant contact information should you require it.