

Privacy Policy and Cookies

Liberty Mutual takes the protection of your personal information seriously and is committed to protecting your privacy. This privacy notice sets out details of the information that we may collect from you and how we may use that information. This privacy notice is intended to provide you with clear and easily accessible information about our privacy practices and policies and to comply with the requirements of Bermuda's Personal Information Protection Act 2016 (PIPA). Please take your time to read this notice carefully. When using a Liberty Mutual website, this notice should be read alongside the website terms and conditions.

1. About Liberty Mutual Management (Bermuda) Ltd.

Liberty Mutual Management (Bermuda) Limited is a regulated insurance manager in Bermuda that provides insurance management and captive services to affiliated, related and unrelated companies. For us to provide our services which involve, among others, forming new companies, activating old captives, and managing a wide range of companies that use different fronts for a variety of programs and services, we need to collect and use information. We also collect your information for recruitment purposes, in our contractual relationships with you and for relationship development, where appropriate.

If you are a customer residing in California, please view the relevant supplementary privacy notice [here](#).

2. Our use of your personal and sensitive personal information

The types of personal information that we collect, and our uses of that personal information will depend on our relationship with you. For example, we will collect different personal information depending on whether you are a policyholder, a beneficiary under an insurance policy, a claimant, a witness, a broker, a potential employee, or another third party.

Sometimes we will request or receive your personal information which is "sensitive personal information" relating to your place of origin, race, colour, national or ethnic origin, sex, sexual orientation, sexual life, marital status, physical or mental disability, physical or mental health, family status, religious beliefs, political opinions or affiliations, trade union membership, biometric information, or genetic information. For example, if you are a beneficial owner or shareholder of one of our clients, we may need to collect your sensitive personal information where it is necessary for Know Your Customer (KYC) or regulatory purposes. You should note that PIPA does not treat personal information relating to criminal allegations, offence or conviction information as sensitive personal information.

We may be able to rely on your deemed consent for personal information, including sensitive personal information, (i) where you have consented to the disclosure of your personal information by an intermediary for a specified purpose, you will be deemed to have consented to the use of that personal information by a receiving organisation for that specified purpose; or (ii) you will be deemed to have consented to the use of your personal information for the purpose of coverage or enrolment under an insurance, trust, benefit or similar plan if you have an interest in or derive a benefit from that plan.

This notice sets out the legal grounds enabling us to use your personal information which includes any sensitive personal information.

Where you provide personal information to us about other individuals (for example, members of your organisation) we will also be responsible for their personal information. You should refer them to this notice before supplying us information on behalf of others.

We may amend the personal information so that you or other individuals cannot be identified from the information either by itself or when combined with any other information we hold. That information will not be subject to this notice or PIPA.

Finally, please note that wherever we refer to insurance arrangements (policies, contracts etc), this also applies to reinsurance arrangements.

To make this notice as user friendly as possible, we have split it into different categories based on our interaction with you. Please navigate to the category that best describes your relationship with us.

2.1. Policyholder or beneficiary under an insurance policy

If you take out an insurance policy with your insurer (who is our client) or if you are listed as an applicant or beneficiary under a policy that someone else has with an insurer (who is our client) (such as a named director under a Directors & Officers policy), this section will be relevant to you and sets out our uses of your personal information.

What personal information will we collect?

- General information such as your name, address, contact phone numbers and email addresses, date of birth and gender.
 - Information about your relationship to the policyholder where you are the beneficiary.
 - Identification information such as passport details, driving licence and national identification number (such as a US social security number).
 - Your bank and payment details.
 - Details about your criminal convictions and any related information to the extent permitted in your jurisdiction. This may include information relating to any offences you have committed or any court sentences which you are subject to.
 - Detailed tax status information, including your tax domicile, tax identification number, copies of tax returns and tax advice received.
 - If relevant, information about your job such as job title, employment history and professional accreditations.
 - Any financial information about you which we have obtained because of conducting credit checks, such as bankruptcy orders, individual voluntary arrangements, or court judgments.
 - Information which we obtain as part of checking sanctions lists, such as, but not limited to those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.
 - Any information which is relevant to your insurance application such as previous insurance policies you have held and claims you have made. Information (including photographic evidence) which is relevant to your policy or claim. For example, if you make a claim following damage to your property, we may use information relating to your property or if you make a claim following a road traffic accident, we may use personal information relating to your vehicle and named drivers.
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- Information which we have gathered from publicly available sources such as newspapers and social media sites.
 - Any other information passed on from you, your insurance broker or someone else applying on your behalf.

What sensitive personal information will we collect?

- Details about your physical and mental health and other sensitive personal information which are relevant to the policy or claim.
- Sensitive personal information that appears on your passport copy i.e. national origin and place of origin as part of identity verification.

How will we collect your personal information?

We may collect information directly from you, and/or from our client (your insurer) as applicable:

- When you make a claim on your policy.
- When you contact your insurer by email, telephone and through other written and verbal communications.
- When you make a complaint.

As well as obtaining information directly from you, we may collect information from:

- The named policyholder where you are a beneficiary.
- Third parties involved in the relevant insurance policy or claim (such as our business partners and representatives, brokers or other insurers, claimants, defendants, or witnesses to an incident).
- Third parties who provide a service in relation to the relevant insurance policy or claim (such as loss adjusters, claims handlers, and medical experts).
- Publicly available sources such as court judgments, insolvency registers, internet search engines, news articles and social media sites.
- Other Liberty Mutual Insurance Group companies.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).
- Our regulators including the Bermuda Monetary Authority and the Office of the Privacy Commissioner of Bermuda.
- The police, tax authorities and other crime prevention and detection agencies.
- Government agencies.
- Third party suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer, or disposal of our business.

What will we use your personal information for?

We may use your personal information for several different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we use your personal information:

- We need to use your personal information to enter or perform the insurance contract that we or your insurer holds with you. We will rely on this for activities such as managing your insurance policy and handling claims.
- We have a legal or regulatory obligation to use such personal information. For example, our regulators require us to hold certain records of our dealings with you.
- We need to use your personal information in ways you would reasonably expect (e.g. to make payments in respect of a claim you make, to keep business records, to carry out strategic business analysis, review our business planning and to develop and improve our products and services) and which will not be prejudicial to your rights. This ground will not be relied upon for the use of sensitive personal information.
- You have provided your consent to our use of your personal information (e.g. in relation to your claim). In some circumstances, we may need your consent to use sensitive personal information (e.g. health information). Without it, we may be unable to provide your policy or handle claims. We will always explain why your consent is necessary.

Reason for use	Legal grounds for using your personal information
To manage and handle your insurance application and queries.	<ul style="list-style-type: none"> • It is necessary to enter or perform your insurance contract. • In line with your reasonable expectations, to assess the insurance application and manage the application process. • You have given us your consent. In some circumstances, we will need your consent before we can provide your policy.
To manage any claims, you make under your insurance policy.	<ul style="list-style-type: none"> • It is necessary to enter into or perform your insurance contract. • In line with your reasonable expectations, to assess and pay your claim and manage the claims process. • You have given us your consent. In some circumstances, we will need your consent before we can pay your claim.
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> • We need to use your information in order to comply with our legal obligations, including carrying out fraud, credit and anti-money laundering checks before we make claims-related payments. • You have given us your consent.

To communicate with you and resolve any complaints that you might have.	<ul style="list-style-type: none"> • It is necessary to enter or perform your insurance contract. • In line with your reasonable expectations, to send you communications, record and investigate complaints and ensure that future complaints are handled appropriately. • You have given us your consent.
For business and management processes and activities including analysis, review, planning, business transaction and IT hosting, support, and security.	<ul style="list-style-type: none"> • In line with your reasonable expectations, to effectively manage our business. • You have given us your consent.
For insurance administration purposes including analysis of trends, carrying out actuarial work, planning service delivery, risk assessment and costs and charges.	<ul style="list-style-type: none"> • In line with your reasonable expectations, to develop and improve the products and services we offer. • You have given us your consent.
To apply for and claim on your insurance.	<ul style="list-style-type: none"> • In line with your reasonable expectations, to ensure that we have appropriate insurance in place. • You have given us your consent.

Who will we share your personal information with?

We will keep your personal information confidential, and we will only share it where necessary for the purposes set out above with the following parties:

- Other Liberty Mutual Insurance Group companies and their service providers.
- Third parties involved in the administration of the relevant insurance policy or claim. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers, and other experts including medical experts.
- Other insurers (e.g. where another insurer has previously provided you with a policy or handled a claim).
- Insurance brokers and other intermediaries.
- Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance.
- Credit reference agencies in relevant jurisdictions
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).
- Our regulators including the Bermuda Monetary Authority and the Office of the Privacy Commissioner of Bermuda.
- The police, tax authorities and other crime prevention and detection agencies.
- Government agencies, third party suppliers, agents and contractors to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers,

document management providers, outsourced business process management providers, our subcontractors and tax advisers.

- Selected third parties in connection with any sale, transfer, or disposal of your insurer's business.
- Any agent or representative acting for you.
- Any other person where necessary to perform any insurance contract with you, in order to protect our client from risk or to ensure regulatory compliance or good governance.

2.2 Beneficial Owners or Shareholders

If you are a beneficial owner or shareholder in respect of which due diligence is performed, this section will be relevant to you and sets out our uses of your personal information.

What personal information will we collect?

- General information such as your name, address, contact phone numbers and email addresses, date of birth and gender.
- Identification information such as passport details, driving licence and national identification number (such as US social security number).
- Depending on the circumstances, we may request financial details.
- If relevant, information about your job such as job title, employment history and professional accreditations.
- Any financial information about you which we have obtained because of conducting credit checks such as bankruptcy orders, individual voluntary arrangements, or court judgments.
- Information which we obtain as part of checking sanctions lists, such as, but not limited to those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.
- Information which we have gathered from publicly available sources such as newspapers and social media sites.
- Any other information passed on from you, or our clients.

What sensitive personal information will we collect?

Details about your nationality, as well as criminal convictions and any related information to the extent permitted in your jurisdiction. This may include information relating to any offences you have committed or any court sentences which you are subject to.

How will we collect your personal information?

We will collect information directly from you:

- When you are a beneficial owner or shareholder of one of our clients.
- When third parties such as regulators or service providers request the information.

As well as obtaining information directly from you, we will collect information from:

- Our clients.
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- Information which we have gathered from publicly available sources such as newspapers and social media sites.
- Other Liberty Mutual Insurance Group companies.
- Credit reference agencies in relevant jurisdictions.
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).

What will we use your personal information for?

We may use your personal information for several different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we use your personal information:

- We need to use your personal information to perform due diligence procedures linked to your role, for example, our regulators require us to hold certain records of our dealings with you. We will also need to use your personal information for any licensing applications we need to make.
- We need to use your personal information in ways you would reasonably expect (e.g. to keep a record of the decisions we make when different types of applications are made, to keep business records, to carry out strategic business analysis, review our business planning and to develop and improve our products and services) and which will not be prejudicial to your rights. This ground will not be relied upon for the use of sensitive personal information.
- You have provided your consent to our use of your personal information. In some circumstances, we may need your consent to use sensitive personal information. Without it, we may be unable to continue the business relationship. We will always explain why your consent is necessary.

Reason for use	Legal grounds for using your personal information
To evaluate clients, including carrying out fraud, credit and anti-money laundering checks.	<ul style="list-style-type: none"> • It is necessary to enter into your contract. • In line with your reasonable expectations, to prevent fraud and other financial crime. • You have given us your consent.
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> • We need to use your information in order to comply with our legal obligations. • You have given us your consent.
For business and management processes and activities including analysis, review, planning, business transaction and IT hosting, support, and security.	<ul style="list-style-type: none"> • It is within your reasonable expectation to effectively manage our business. • You have given us your consent.
For administration of our services, including analysis of trends, carrying out actuarial work, planning service delivery, risk assessment and costs and charges	<ul style="list-style-type: none"> • It is within your reasonable expectation to develop and improve the products and services we offer. • You have given us your consent.

Who will we share your personal information with?

We will keep your personal information confidential, and we will only share it where necessary for the purposes set out above with the following parties:

- Other Liberty Mutual Insurance Group companies and their service providers.
- Credit reference agencies in relevant jurisdictions.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).
- Our regulators including the Bermuda Monetary Authority and the Office of the Privacy Commissioner of Bermuda.
- The police, tax authorities and other crime prevention and detection agencies.
- Government agencies.
- Third party suppliers, agents and contractors to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, corporate service providers, banking and financial institutions, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any transfer or disposal of our business.
- Any agent or representative acting for you.

2.3 Directors, alternates, officers, contractors or other individuals with signing authority of one our clients or a service provider/professional appointed by our client

If you are a director, alternate, officer, contractor or other individual with signing authority of one our clients or a service provider/professional appointed by our client, this section will be relevant to you and sets out our uses of your personal information.

What personal information will we collect?

- General information such as your name, address, contact phone number and email address, date of birth and gender.
 - Identification information such as passport details, driving licence and national identification number.
 - Depending on the circumstances, we may request financial details.
 - If relevant, information about your job such as job title, employment history and professional accreditations.
 - Any financial information about you which we have obtained because of conducting credit checks such as bankruptcy orders, individual voluntary arrangements or court judgments.
 - Information which we obtain as part of checking sanctions lists, such as, but not limited to those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.
 - Information which we have gathered from publicly available sources such as newspapers and social media sites.
 - Any other information passed on from you, or our clients.
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What sensitive personal information will we collect?

Details about your nationality, as well as criminal convictions and any related information to the extent permitted in your jurisdiction. This may include information relating to any offences you have committed or any court sentences which you are subject to.

How will we collect your personal information?

We may collect information directly from you:

- When you are an appointed director, officer, or signatory of one of our clients.
- When you are a key executive with operational control of one of our clients.
- When third parties such as regulators or service providers request the information.

As well as obtaining information directly from you, we will collect information from:

- Our clients.
- Information which we have gathered from publicly available sources such as newspapers and social media sites.
- Other Liberty Mutual Insurance Group companies.
- Credit reference agencies in relevant jurisdictions.
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).

What will we use your personal information for?

We may use your personal information for several different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we use your personal information:

- We need to use your personal information to perform due diligence procedures linked to your role, for example, our regulators require us to hold certain records of our dealings with you.
- We need to use your personal information in ways you would reasonably expect (e.g. to keep a record of the decisions we make when different types of applications are made, to keep business records, to carry out strategic business analysis, review our business planning and to develop and improve our products and services) and which will not be prejudicial to your rights. This ground will not be relied upon for the use of sensitive personal information.
- You have provided your consent to our use of your personal information. In some circumstances, we may need your consent to use sensitive personal information. Without it, we may be unable to continue the business relationship. We will always explain why your consent is necessary.

Reason for use	Legal grounds for using your personal information
To evaluate clients, including carrying out fraud, credit, and anti-money laundering checks.	<ul style="list-style-type: none">• It is necessary to enter your contract.• In line with your reasonable expectations, to prevent fraud and other financial crime.

	<ul style="list-style-type: none"> You have given us your consent.
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> We need to use your information to comply with our legal obligations. You have given us your consent.
For business and management processes and activities including analysis, review, planning, business transaction and IT hosting, support, and security.	<ul style="list-style-type: none"> It is within your reasonable expectation to effectively manage our business. You have given us your consent.
For administration of our services, including analysis of trends, carrying out actuarial work, planning service delivery, risk assessment and costs and charges.	<ul style="list-style-type: none"> It is within your reasonable expectation to develop and improve the products and services we offer. You have given us your consent.

Who will we share your personal information with?

We will keep your personal information confidential, and we will only share it where necessary for the purposes set out above with the following parties:

- Other Liberty Mutual Insurance Group companies (both inside and outside the European Economic Area) and their service providers.
- Credit reference agencies in relevant jurisdictions.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).
- Our regulators including the Bermuda Monetary Authority and the Office of the Privacy Commissioner of Bermuda.
- The police, tax authorities and other crime prevention and detection agencies.
- Government agencies.
- Third party suppliers, agents and contractors to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, corporate service providers, banking and financial institutions, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any transfer or disposal of our business.
- Any agent or representative acting for you.

2.4 Third party claimant

If you make a claim against a third party who has an insurance policy with our client, this section will be relevant to you and sets out our uses of your personal information.

What personal information will we collect?

- General information such as your name, address, contact phone number and email address and date of birth.
- Identification information such as passport details, driving licence and national identification number.
- Your bank and payment details.

- Any court records which contain your personal information relevant to your claim.
- Information which we obtain as part of checking sanctions lists, such as, but not limited to those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.
- Information relating to previous insurance policies you have held and claims you have made.
- Any other information passed on from you, your representative or someone else making the claim on your behalf.

What sensitive personal information will we collect?

Details about your physical and mental health and other sensitive personal information which are relevant to your claim.

How will we collect your personal information?

We will collect information from your insurer or broker:

- When you make a claim.
- When you otherwise contact them by email, telephone and through other written and verbal communications.

What will we use your personal information for?

We may use your personal information for several different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we use your personal information:

- We have a legal or regulatory obligation to use such personal information. For example, our regulators require us to hold certain records of our dealings with you.
- We need to use your personal information in ways which you would reasonably expect (e.g. to keep business records and make payments in respect of your claim) and which will not be prejudicial to your rights. This ground will not be relied upon for the use of sensitive personal information.
- Alternatively, you have provided your consent to our use of your personal information. In some circumstances, we may need your consent to use sensitive personal information (e.g. health information). Without it, we may be unable to handle your claims. We will always explain why your consent is necessary.

Reason for use	Legal grounds for using your personal information
To manage claims.	<ul style="list-style-type: none"> • In line with your reasonable expectations, to make payments in respect of your claim and manage the claims process. • We need to use your information in order to comply with our legal obligations.

	<ul style="list-style-type: none"> You have given us your consent.
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> We need to use your information in order to comply with our legal obligations. You have given us your consent.

Who will we share your personal information with?

We will keep your personal information confidential, and we will only share it where necessary for the purposes set out above with the following parties:

- Other Liberty Mutual Insurance Group companies and their service providers.
- Third parties involved in the administration of your claim such as loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers, and other experts including medical experts.
- Other insurers (e.g. where another insurer is also involved in a claim that you are making).
- Our insured policyholder.
- Insurance brokers and other intermediaries.
- Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance.
- Insurance industry bodies.
- Third parties who provide sanctions checking services.
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).
- Our regulators including but not limited to the Bermuda Monetary Authority and the Office of the Privacy Commissioner of Bermuda.
- The police, tax authorities and other crime prevention and detection agencies.
- Government agencies, third party suppliers, agents and contractors to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer, or disposal of our business.
- Any agent or representative acting for you.
- Any other person where necessary to perform any insurance contract with you, in order to protect us from risk or to ensure regulatory compliance or good governance.

2.5 Witnesses to an incident

If you are a witness to an incident which is the subject of a claim, this section will be relevant to you and sets out our uses of your personal information.

What personal information will we collect?

- General information such as your name, address, contact phone number and email address.
- Information relevant to the incident that you have witnessed, including from court records.

What sensitive personal information will we collect?

It is not standard practice to collect sensitive personal information of witnesses to an accident. However, if you are involved in the accident and your details are supplied to us (for example, within a medical report) we might use your sensitive personal information for the purposes of the claim.

How will we collect your information?

As well as obtaining information directly from you, we will collect information from:

- Third parties involved in the incident you witnessed (such as brokers or other insurers, claimants, defendants, or other witnesses).
- Other third parties who provide a service in relation to the claim which relates to the incident you witnessed (such as loss adjusters, claims handlers, and experts).
- Publicly available sources such as court judgments, insolvency registers, insurance industry databases, internet search engines, news articles and social media sites.
- Other companies within the Liberty Mutual Insurance Group.

What will we use your personal information for?

We may use your personal information for several different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we use your personal information:

- We have a legal or regulatory obligation to use such personal information. For example, our regulators require us to hold certain records of our dealings with you.
- We need to use your personal information in ways you would reasonably expect (e.g. to properly investigate incidents which are the subject of a claim, for business and management processes and activities including analysis, review, planning, business transaction and IT hosting, support and security, and to prevent and investigate fraud) and which will not be prejudicial to your rights. This ground will not be relied upon for the use of sensitive personal information.
- Alternatively, you have provided your consent to our use of your personal information. In some circumstances, we may need your consent to use sensitive personal information (e.g. health information). Without it, we may be unable to handle your claims. We will always explain why your consent is necessary.

Reason for use	Legal grounds for using your personal information
To manage claims.	<ul style="list-style-type: none">• In line with your reasonable expectations, to make payments in respect of the claim and manage the claims process.• We need to use your information in order to comply with our legal obligations.• You have given us your consent.

To comply with our legal or regulatory obligations.	<ul style="list-style-type: none">• We need to use your information in order to comply with our legal obligations.• You have given us your consent.
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Who will we share your personal information with?

We will keep your personal information confidential, and we will only share it where necessary for the purposes set out above with the following parties:

- Other Liberty Group companies.
- Third parties involved in the administration of an insurance policy or claim. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers, and other experts including medical experts.
- Other insurers (e.g. where another insurer is also involved in the claim which relates to the incident you witnessed).
- Insurance brokers and other intermediaries.
- Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance.
- Insurance industry bodies.
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).
- Our regulators including but not limited to the Bermuda Monetary Authority and the Office of the Privacy Commissioner of Bermuda.
- The police, tax authorities and other crime prevention and detection agencies.
- Government agencies.
- Third party suppliers, agents and contractors to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer, or disposal of our business.
- Any agent or representative acting for you.
- Any other person where necessary to perform any insurance contract with you, in order to protect us from risk or to ensure regulatory compliance or good governance.

2.6 Brokers, appointed representatives, suppliers and other business partners

If you are a broker doing business with us, an appointed representative or other business partner such as an introducer or supplier, this section will be relevant to you and sets out our uses of your personal information.

What personal information will we collect?

- General information such as your name, address, contact phone number and email address and job title.
 - Identification information such as passport details, driving licence and national identification number.
 - Information which we obtain as part of checking sanctions lists, such as, but not limited to, those published by United Nations, European Union, UK Treasury, the U.S. Office of
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Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.

- Other information (including publicly available information) obtained as part of our due diligence checks.
- If you attend an event with us, we may collect relevant details such as your event preferences and dietary requirements.

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What sensitive personal information will we collect?

- To the extent permitted in your jurisdiction, information relating to your criminal convictions. This may include information relating to any offences you have committed or any court sentences which you are subject to.
- If you attend an event with us, we may collect dietary requirements which could indicate a health condition or religious belief.
- In the event of an emergency, we may need to collect sensitive personal information about you such as your health information.

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How will we collect your information?

As well as obtaining information directly from you, we will collect information from:

- Invoices, contracts, policies, correspondence, and business cards
- Other Liberty Mutual Insurance Group companies.
- Publicly available sources such as internet search engines.
- From service providers who carry out sanctions checks.
- Information is disclosed by you (e.g. in case of emergency) or by your employer to us.

What will we use your personal information for?

We may use your personal information for several different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we use your personal information:

- We need to use your personal information to enter or perform the contract that we hold with you. For example, we may need certain information to operate our business partnership arrangement.
 - We have a legal or regulatory obligation to use such personal information. For example, we may be required to carry out certain background checks.
 - We need to use your personal information in ways you would reasonably expect and which will not be prejudicial to your rights, for example:
 - for business and management processes and activities including analysis, review, planning, business transactions and IT hosting, support, and security,
 - to develop and improve our products and services),
 - to write business and for claims handling,
 - for business development and relationship purposes,
 - to manage and handle your queries,
 - for insurance administration purposes including analysis of trends, carrying out actuarial work, planning service delivery, risk assessment and costs and charges.
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This ground will not be relied upon for the use of sensitive personal information.

- Alternatively, you have provided your consent to our use of your personal information. In some circumstances, we may need your consent to use sensitive personal information. Without it, we may be unable to continue the business relationship. We will always explain why your consent is necessary.

Reason for use	Legal grounds for using your personal information
For business and management processes and activities including analysis, review, planning, business transaction and IT hosting, support and security.	<ul style="list-style-type: none">• It is within your reasonable expectation (to effectively manage our business).• You have given us your consent.
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none">• We need to use your information in order to comply with our legal obligations.• You have given us your consent.
Providing improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers).	<ul style="list-style-type: none">• It is within your reasonable expectation (to develop and improve the products and services we offer).• You have given us your consent.
To manage and handle your queries	<ul style="list-style-type: none">• It is within your reasonable expectation (to effectively manage our business and respond to queries).• It is necessary to enter into or perform our contract with you.• You have given us your consent.
For insurance administration purposes, including analysis of trends, carrying out actuarial work, planning service delivery, risk assessment and costs and charges.	<ul style="list-style-type: none">• It is within your reasonable expectation (to effectively manage our business and respond to queries).• You have given us your consent.• Such use is necessary for insurance purposes.
To provide protection in case of emergency.	<ul style="list-style-type: none">• It is necessary to respond to an emergency.

	<ul style="list-style-type: none">• You have given us your consent.
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Who will we share your personal information with?

We will keep your personal information confidential, and we will only share it where necessary for the purposes set out above with the following parties:

- Our policyholders and other third parties such as claimants, where relevant.
- Other Liberty Mutual Insurance Group companies.
- Third parties involved in the administration of an insurance policy or claim. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers, and other experts including medical experts.
- Our insurance partners such as other brokers and insurers.
- Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance.
- Third parties who provide sanctions checking services.
- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers.
- Our regulators including the Bermuda Monetary Authority and the Office of the Privacy Commissioner of Bermuda.
- The police, tax authorities and other crime prevention and detection agencies.
- Government agencies.
- Third party suppliers, agents and contractors to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, client relationship system providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer, or disposal of our business.
- Any agent or representative acting for you.
- Any other person where necessary to perform any insurance contract, to protect us from risk or to ensure regulatory compliance or good governance.
- Anyone where strictly necessary to protect you in case of emergency.

2.7 Users of this website

If you are a user of our website (or a platform that links through to this notice), this section will be relevant to you and sets out our uses of your personal information.

What personal information will we collect?

- General information submitted via the website or platform, for example where you provide your details in the contact section such as your name, contact details and company name.
- Information obtained through our use of cookies. You can find more information about this in our cookies policy in the Cookies section below.
- Information obtained through a sign-up form or promotion.

What sensitive personal information will we collect?

- We do not anticipate collecting sensitive personal information through our website.

How will we collect your personal information?

- We will collect your information directly from our website or a platform that links you through to our website.
- Our websites may also collect your device's unique identifier, such as an IP address.

What will we use your personal information for?

We may use your personal information for several different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we use your personal information:

- We need to use your personal information to enter or perform the insurance contract that we hold with you. For example, we need to use your personal information to respond to your enquiry about a quote.
- We have a legal or regulatory obligation to use such personal information. For example, our regulators require us to hold certain records of our dealings with you.
- We need to use your personal information in ways you would reasonably expect and which will not be prejudicial to your rights, for example:
 - to monitor the number of visitors to our website,
 - to keep business records and to develop and improve our products and services,
 - to register you as a user of the website (including recording information on our server logs from your browser, including your IP address and the page you requested),
 - to follow up on enquiries you make,
 - to provide marketing information to you,
 - to allow you to apply for recruitment opportunity and our subsequent management of your application,
 - to allow you to apply for an event and our subsequent management of the event,
 - to store your details on our Customer Relationship Management systems.

This ground will not be relied upon for the use of sensitive personal information.

- Alternatively, you have provided your consent to our use of your personal information. In some circumstances, we may need your consent to use sensitive personal information. Without it, we may be unable to continue the business relationship. We will always explain why your consent is necessary.

Reason for use	Legal grounds for using your personal information
To register you as a user of the website (including recording information on our server logs from your browser, including your IP address and the page you requested)	<ul style="list-style-type: none"> • In line with your reasonable expectation (to allow you to use the website and ensure its proper functionality).

To follow up on enquiries you make.	<ul style="list-style-type: none"> • In line with your reasonable expectation (to respond to your queries). • You have given us your consent.
To provide marketing information to you.	<ul style="list-style-type: none"> • In line with your reasonable expectation (to send you selected communications about other products and services we offer). • You have given us your consent.
To allow you to apply for a recruitment opportunity and for our subsequent management of your application.	<ul style="list-style-type: none"> • In line with your reasonable expectation (to ensure that your application is processed and managed effectively). • You have given us your consent.
To allow you to apply for an event and out subsequent management of the event.	<ul style="list-style-type: none"> • In line with your reasonable expectation (to enable you to register for the event). • You have given us your consent.
To store your details on our Customer Relationship Management systems.	<ul style="list-style-type: none"> • In line with your reasonable expectation (to improve our relationship with you). • You have given us your consent.

Who will we share your personal information with?

We will keep your personal information confidential, and we will only share it where necessary for the purposes set out above with our Liberty Mutual Insurance Group companies, our agents or contractors.

2.8 Prospective job applicants

If you are applying for a job with us, this section will be relevant to you and sets out our uses of your personal information.

What personal information will we collect?

- General information such as your name, address, contact phone number and email address, date of birth and gender.
- Information about your current job such as job title and previous roles.
- Information about your right to work in Bermuda.
- Other information (including publicly available information) obtained as part of our due diligence checks.
- In the event you attend career events with us, we may collect relevant details e.g. your event preferences, , dietary requirements etc.

What sensitive personal information will we collect?

- To the extent permitted in your jurisdiction, information relating to your criminal convictions. This may include information relating to any offences you have committed or any court sentences which you are subject to.
- We may also collect information about your nationality and family status as part of your application.

- In the event you attend events with us, we may collect dietary requirements.
- If your CV contains any trade union memberships or any other sensitive personal information then these will be collected.

How will we collect your information?

As well as obtaining information directly from you, we may collect information from service providers e.g. recruitment companies you have instructed.

Note, if you email us your CV or application, we will store it in our recruitment systems up to 2 years unless you object.

What will we use your personal information for?

We may use your personal information for several different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we use your personal information:

- We need to use your personal information to enter or perform the employment contract that we hold with you. For example, we may need certain information to draft an offer of employment.
- We have a legal or regulatory obligation to use such personal information. For example, we may be required to carry out certain background checks.
- We need to use your personal information in the context of your present, past or potential employment relationship with us.
- We need to use your personal information for other purposes that you would reasonably expect (e.g. to keep your CV on file in case future opportunities arise) and which will not be prejudicial to your rights. This ground will not be relied upon for the use of sensitive personal information.
- Alternatively, you have provided your consent to our use of your personal information. In some circumstances, we may need your consent to use sensitive personal information. Without it, we may be unable to continue the business relationship. We will always explain why your consent is necessary.

Reason for use	Legal grounds for using your personal information
For business and management processes and activities including analysis, review, planning, business transactions and IT (hosting, support and security).	<ul style="list-style-type: none"> • It is within reasonable expectations to effectively manage our business. • You have given us your consent. • Such use is necessary for employment purposes.
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> • We need to use your information in order to comply with our legal obligations. • You have given us your consent.
To manage and handle your queries.	<ul style="list-style-type: none"> • It is within reasonable expectations to effectively manage our business and respond to queries.

	<ul style="list-style-type: none"> • It is necessary to enter into or perform our contract with you. • Such use is necessary for employment purposes. • You have given us your consent.
For recruitment administration purposes.	<ul style="list-style-type: none"> • It is within reasonable expectations to operate our recruitment function. • Such use is necessary for employment purposes. • You have given us your consent.

Who will we share your personal information with?

We will keep your personal information confidential and we will only share it where necessary for the purposes set out above with the following parties:

- Other Liberty Mutual Insurance Group companies (both inside and outside Bermuda) and their service providers.
- Third parties involved in the hosting, analysis, and supply of recruitment services.
- Credit reference agencies in relevant jurisdictions.
- Our regulators including the Bermuda Monetary Authority and the Office of the Privacy Commissioner of Bermuda.
- The police, tax authorities and other crime prevention and detection agencies.
- Government agencies.
- Third party suppliers, agents and contractors to help us carry out our everyday business activities including IT suppliers, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer, or disposal of our business.
- Any agent or representative acting for you.
- A select group of third-party suppliers used to host and manage our recruitment portals (based in the USA).

2.9 Employees and contractors of our clients

If you are an employee or contractor of one of our clients, this section will be relevant to you and sets out our uses of your personal information.

What personal information will we collect?

- General information such as your name, address, contact phone number and email address, date of birth.
- Information about your current job such as job title, previous roles, salary and employment benefits.
- Your bank account information and social security number.
- Details of your expenses.

What sensitive personal information will we collect?

We may need to collect some sensitive personal information in respect of your employment or work carried out for our client, such as whether you are Bermudian.

How will we collect your information?

We will collect your information directly from you or from our client, who may be either your employer if you are an employee or the company that you have otherwise contracted with, if you are a contractor.

What will we use your personal information for?

We may use your personal information for several different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we use your personal information:

- We need to use your personal information to provide payroll services for our client (e.g. paying your salary and any expenses) as well as setting up your pension arrangements.
- You have provided your consent to our use of your personal information. In some circumstances, we may need your consent to use sensitive personal information. Without it, we may be unable to continue the business relationship. We will always explain why your consent is necessary.
- We need to use your personal information in the context of your present, past or potential employment relationship with us.

Reason for use	Legal grounds for using your personal information
To provide payroll services and setting up pension arrangements	<ul style="list-style-type: none">• We need to use your information in order to comply with our legal obligations.• Such use is in the context of employment.• You have given us your consent.

Who will we share your personal information with?

We will keep your personal information confidential and we will only share it where necessary for the purposes set out above with the following parties:

- Other Liberty Mutual Insurance Group companies (both inside and outside Bermuda) and their service providers.
- Third party suppliers, agents and contractors to help us carry out our everyday business activities including IT suppliers, auditors, lawyers, and our subcontractors.
- Other third parties such as pension providers, the Bermuda government (for the purposes of payroll taxes, immigration, social security and other legal/regulatory obligations).

2.10 External visitors to our offices

If you will be visiting our Bermuda office, this section will be relevant to you and sets out our uses of your personal information.

What personal information will we collect?

- General information such as your name, address, contact phone number and email address.
- Information about your job such as job title and reason for visiting the office.

What sensitive personal information will we collect?

- We may need to use your sensitive personal information such as your health information in case of emergency.

How will we collect your information?

- We will ordinarily obtain information directly from you.

What will we use your personal information for?

We may use your personal information for several different purposes. In each case, we must have a legal ground to do so. We will rely on the following legal grounds when we use your personal information:

- We need to use your personal information to record your access for security reasons.
- We have a legal or regulatory obligation to use such personal information. For example, we may be required to comply with health and safety laws and regulations.
- You have provided your consent to our use of your personal information. In some circumstances, we may need your consent to use sensitive personal information. Without it, we may be unable to continue the business relationship. We will always explain why your consent is necessary.

Reason for use	Legal grounds for using your personal information
For business management	<ul style="list-style-type: none">• In line with your reasonable expectations, to effectively manage our business and ensure secure access to our premises.• We will rely on your consent.
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none">• We need to use your information in order to comply with our legal obligations.• We will rely on your consent.
To provide protection in case of emergency.	<ul style="list-style-type: none">• Our use is necessary in order to protect your vital interests or those of another person.• We will rely on your consent.

Who will we share your personal information with?

We will keep your personal information confidential, and we will only share it where necessary for the purposes set out above with the following parties:

- Other Liberty Mutual Insurance Group companies (both inside and outside the European Economic Area) and their service providers.
- Third parties providing security services.
- The emergency services and other public bodies.
- Any agent or representative acting for you.

3. What marketing and/or profiling activities do we carry out?

Marketing: We will only send marketing communications to our business contacts. This may be done by post, email or telephone.

In each case, we will give you the opportunity to opt out. You can also opt out at any time by sending us a request to cease using your information as set out in section 7 below.

4. How long do we keep personal information for?

We will keep your personal information for as long as reasonably necessary to fulfil the purposes set out in the section above and to comply with our legal and regulatory obligations. It is important to us that any sensitive personal information that we collected and retain is only the absolute minimum amount of information.

We have a detailed retention policy in place which governs how long we will hold different types of information for. The exact time will depend on your relationship with us and the type of personal information we hold.

If you would like further information regarding the periods for which your personal information will be stored, please contact us using the details set out in section 9.

5. What is our approach to sending your personal information to overseas third parties?

Sometimes we (or third parties acting on our behalf) will transfer personal information that we collect about you to countries outside of Bermuda. Prior to making any transfer we shall assess the level of protection provided by the overseas third party and the laws applicable to the overseas third party for your personal information.

Where a transfer occurs, we will take reasonable steps to ensure that your personal information is protected and will adopt appropriate safeguards against risk (including physical and IT based security measures and controls) proportional to the potential harm, sensitivity and context of the personal information in compliance with applicable laws to protect your personal information against loss, unauthorized access, destruction, use, modification, disclosure or other misuse. We will do this using a number of different methods including putting in place appropriate contracts. We will use a set of contract wording known as the "standard contractual clauses" which has been approved by the various data protection authorities (excluding the Privacy Commissioner).

Depending on our relationship and your circumstances, we might transfer personal information anywhere in the world.

A summary of our regular data transfers outside Bermuda is set out below:

Country of transfer	Reason for the transfer	Methods we use to protect your information
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United States	Transfer to Liberty Mutual Group Companies in the US - Reporting to our parent company, IT support and hosting, centralised business functions in the United States.	Robust IT Security Standards employed and Standard Contractual Clauses.
United States, UK, Canada, and China	Transfer to service providers and / or our clients (the insurers) to enable us to perform our business.	IT Security Standards employed, supplier due diligence, contracts, audits, and Standard Contractual Clauses.

If you would like further information regarding our data transfers and the steps, we take to safeguard your personal information, please contact us using the details set out in section 9.

6. How do we protect your personal information?

Liberty Mutual Management (Bermuda) Limited takes security of your information very seriously. We maintain appropriate technical, organisational, and physical safeguards designed to protect the personal information we use in accordance with client instructions and in line with our legal and regulatory obligations. The security measures in place on our website and computer systems are in place to protect the loss, unauthorized access, destruction, use, modification, disclosure or other misuse of the information you provide to us. We keep your personal information only for as long as reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

The Liberty Mutual Group has several Information Security Standards that apply depending on the data type and data location. These standards cover access controls, encryption, network and host security, physical security, data recovery and business continuity. Our standards change from time to time as we react to market challenges and changing regulatory requirements.

Because e-mails submitted via this website are not protected by the same security measures we use in other areas where we actively collect information, you should be particularly careful in deciding what information you wish to send to us via e-mail.

If you become aware of any actual or potential misuse of any such information or for more information on IT Security, please contact us using the details set out in section 9.

7. Your rights

Under PIPA you have several rights in relation to the personal information that we hold about you which we set out below. You can exercise your rights by contacting us in writing at any time using the details set out in section 9. We will not usually but may charge you a reasonable fee in relation to a request.

Please note that although we take your rights seriously, there may be some circumstances where we cannot comply with your request such as, where complying with it would mean we were in conflict with our own legal or regulatory requirements, or where a request is manifestly unreasonable. In these instances, we will let you know why we cannot comply with your request.

Where we rely on your consent in order to use your personal information, you can withdraw such consent to further use of your personal information. Please note that for some purposes, we may need your consent in order to provide your policy. If you withdraw your consent, we may need to cancel your policy or we may be unable to pay your claim. We will advise you of this at the point you seek to withdraw your consent.

- **The right to access your personal information**

You are entitled to request access to (a) your personal information that is in our custody or control (b) the purposes for which we have been or are using your personal information; and (c) the names of persons or types of persons and circumstances for which your personal information has or is being disclosed. You may ask for a copy of the personal information we hold about you or ask to examine your personal information.

We will usually provide your personal information to you by electronic means unless you request otherwise.

- **The right to access your medical records**

You are entitled to request a copy of your medical records we hold and certain details of how we use it.

We will usually provide your personal information to you by electronic means unless you request otherwise.

- **The right to request correction**

We take reasonable steps to ensure that the information we hold about you is accurate and where necessary up to date and complete. If you believe that there are any inaccuracies, discrepancies, or gaps in the information we hold about you, you can contact us and request us to correct or amend it as soon as reasonably practicable.

- **The right to blocking**

You are entitled to ask us to stop using your personal information for the purposes of advertising, marketing or public relations, or where our use of your personal information is causing or is likely to cause you or another person substantial damage or distress.

- **The right to withdraw your consent**

Where we rely on your consent to use your personal information, you have the right to withdraw such consent to our further use of your personal information.

Please note that for some purposes, we need your consent to provide your policy. If you withdraw your consent, we may need to cancel your policy or we may be unable to pay your claim. We will advise you of this at the point you seek to withdraw your consent.

- **The right to erasure**

You have the right to request us to erase or destroy your personal information where that personal information is no longer relevant for the purposes of its use.

Whilst we will assess every request, we may be unable to erase your information in certain cases, such as where we have a regulatory obligation to keep it.

- **The right to make a complaint to the Privacy Commissioner**

You have a right to complain to the Privacy Commissioner of Bermuda if you believe that we have breached PIPA when using your personal information.

You can visit the Privacy Commissioner's website at <https://www.privacy.bm>. Please note that lodging a complaint will not affect any other legal rights or remedies that you have.

To exercise the rights described above, a verifiable request may be made to Liberty Mutual Management (Bermuda) Limited by either:

- Online: [PIPA Individual Rights Requests](#)
- Mail: Liberty Specialty Markets
20 Fenchurch Street
London, EC3M 3AW
Attn: Privacy Officer (for Liberty Mutual Management (Bermuda) Limited)

8. Cookies

By accessing and using this website you indicate that you accept Liberty Mutual Management (Bermuda) Limited's use of cookies.

The website uses cookies which are small files of letters and numbers that Liberty Mutual Management (Bermuda) Limited puts on your computer if you allow it. After your visit to the website, the cookies will remember your language selection during your visit. They also allow us to recognise and count the number of visitors and to see how visitors move around the site. Some of the cookies are required to provide you with access to the website and to make your browsing experience more user-friendly.

This website may link through to third party websites (including websites of companies within the Liberty Mutual Insurance Group) which may also use cookies over which we have no control. We recommend that you check the relevant third parties' privacy policies for information about any cookies that they may use.

You can configure your web browser to refuse cookies, to delete cookies, or to be informed if a cookie is set. The "Help" section on the menu bar of most internet browsers will tell you how to do so. You may delete and block all cookies but, if you do so, our website may not function correctly, and you may not be able to access certain areas. For more information about cookies and how to delete them, visit <http://www.allaboutcookies.org/>.

9. Contacting us

If you would like further information about any of the matters in this notice or if you have any other questions about how we collect, store or use your personal information, you may contact our Privacy Officer at dataprotectionofficer@libertyglobalgroup.com or by writing to Liberty Specialty Markets, 20 Fenchurch Street, London, EC3M 3AW (marked for Privacy Officer's attention for Liberty Mutual Management (Bermuda) Limited).

Please note that we are not responsible for the privacy policies or content of any websites linked to this website, (including websites of companies within the Liberty Mutual Insurance Group).

10. Updates to this notice

From time to time, we may need to make changes to this notice, for example, as the result of changes to law, technologies, or other developments. We will provide you with the most up-to-date notice and you can [check our website here](#) periodically to view it.

This notice was last updated on 11th December 2024.
