



## AGAM Bermuda Ltd. and affiliated entities External Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

### Contact details

Email

[privacy@agamcapital.bm](mailto:privacy@agamcapital.bm)

### What information we collect, use, and why

We collect or use the following personal information for the operation of client or customer accounts, to comply with legal requirements, and for recruitment purposes:

- Names and contact details
- Addresses
- Anonymized Claims Data
- Any other personal information required to comply with legal obligations
- Date of birth
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Security clearance details (eg basic checks and higher security clearance)

### Your Data protection rights

- Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
- Your right to correction - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- Your right to erasure - You have the right to ask us to delete your personal information.
- Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information
- Your right to object to processing - You have the right to object to the processing of your personal data
- Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time.

If you make a request, we must respond to you without undue delay and in any event within 45 days.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.



## Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, and the right to object.

## Where we get personal information from

- Directly from you
- Credit reference agencies
- Suppliers and service providers
- Business Partners and Affiliates

## How long we keep information

We will retain your personal information for as long as necessary to fulfill the purposes for which it was collected or as required by law. We will securely dispose of personal information that is no longer needed in a manner that protects your privacy.

## Who we share information with

- Insurance companies, brokers or other intermediaries
- Professional or legal advisors
- Service providers
- Business partners, affiliates
- Regulatory authorities

We only share personal information with third parties in accordance with this Privacy Notice. We take steps to ensure that any third party whom we share your personal information has appropriate data protection measures in place to safeguard your personal information.

## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the Office of the Privacy Commission for Bermuda.



The Privacy Commission's address:

Maxwell Roberts Building

4th floor

1 Church Street

Hamilton, HM11

Bermuda

Helpline number: 441-543-7748

Website: [www.privacy.bm](http://www.privacy.bm)

Email: [privcom@privacy.bm](mailto:privcom@privacy.bm)

**Last updated**

5 December 2024