

We are committed to protecting and respecting your privacy in accordance with the current Data Protection Legislation (“Legislation”). This notice sets out the basis on which we will process any personal data that we collect from you, or that you provide to us. For the purposes of the Legislation, the Data Controller in relation to any personal data you supply to us will be Liberty Mutual Surety Europe, B.V. to whom you have provided your data.

In order for us to deliver surety bonds and guarantee insurance on your behalf, it may involve us obtaining information in order to provide you pricing, the actual surety bonds or guarantees, address claims or complaints and deal with any regulatory issues surrounding the foregoing. Any documentation which you receive may utilize either the name Liberty Mutual Surety Europe, B.V. and may refer to a branch operation, our trading name of Liberty Mutual Surety, the insurance company whose paper such bonds or guarantees may be issued upon, Liberty Mutual Insurance Europe, SE, a related company such as Liberty Mutual Insurance Company, or the ultimate parent company of all of the foregoing, Liberty Mutual Group.

Information we may collect or receive about you

We collect and process personal data that you provide directly to us by filling in forms, via our website, over the phone or via e-mail, or that we receive via third parties (for example – public records, brokers, agents, claims investigators, claims handlers and business partners).

How we use your information

All data that you supply directly or that we receive from third parties, are necessary for the purposes of your surety relationship with us and for us to be able to carry out our specific functions arising out of or relating to that relationship. The following are some examples of how and under what circumstance we may use the information.

Category of personal data	Purpose of processing	Legal basis for processing
General identification and contact information	Calculate premium, offering and accepting cover, offering renewal, informing of changes in services, handling of complaints	Fulfil our contractual obligations towards you or, at your request, take necessary steps prior to entering into a contract with you; <i>or</i>
		Liberty Mutual’s legitimate interests of improving its

Category of personal data	Purpose of processing	Legal basis for processing
		products, development of its systems and to offer you relevant products
	Validate/confirm your identity	Fulfil our contractual obligations towards you; <i>or</i>
		Comply with applicable laws
	Issuing newsletters	Liberty Mutual's legitimate interests of improving its products and services, and keeping you informed of industry changes
	Answer your questions through the web, e-mail, mail or phone.	Fulfil our contractual obligations towards you
	Prevent, discover, investigate criminal offences (including fraud)	Comply with applicable laws
	Comply with applicable laws and regulatory obligations	Comply with applicable laws
Information enabling us to provide products and services	Calculate premium, offering and accepting cover, offering renewal and informing of changes	Fulfil our contractual obligations towards you or, at your request, take necessary steps prior to entering into a contract with you; <i>or</i>
		Liberty Mutual's legitimate interests of improving its products, development of its

Category of personal data	Purpose of processing	Legal basis for processing
		systems and to offer you relevant products
	Perform claims handling	Fulfil our contractual obligations towards you
Financial information	Calculate premium, offering and accepting cover and offering renewal	Fulfil our contractual obligations towards you
	Perform underwriting and/or claims handling	Fulfil our contractual obligations towards you
Information which is necessary to discover, prevent or investigate fraud or investigations towards financial sanctions lists	Discover, prevent or investigate fraud or investigations towards financial sanctions lists	Comply with applicable laws

Disclosure of your personal data

To enable us to consider extension of surety bonds, to underwrite, manage claims and to support our general business activities and regulatory obligations, we disclose your data to; (a) companies within the Liberty Mutual Group; (b) external parties such as beneficiaries of the surety bonds or guarantees, (c) external parties including our businesses partners who are involved in offering products and services to you; (c) our service providers; and (d) governmental or other public authorities. These categories include:

- **Companies within Liberty Mutual Group** – You will find a list of the companies included in the Liberty Mutual Group at www.libertymutual.com.
- **Beneficiaries of the surety bonds or guarantees**

- **Distribution partners** – Intermediary and tied agents, brokers, affinity/business partners and other distributors, reinsurers, administrators, financial institutions and other business partners.
- **Our service providers** – External service providers, such as accountants, actuaries; call center service providers; auditors, experts, lawyers and other outside professional advisors; IT systems, support and hosting service providers; printing and analysis service providers; banks and financial institutions; third-party claim administrators; claim investigators and adjusters; and outsourced service providers that assist us in carrying out business activities.
- **Governmental or other public authorities** – Liberty Mutual may share personal data with governmental or other public authorities (including, but not limited to supervisory authorities, courts, law enforcement, tax authorities and criminal investigations agencies and to authorities we are obligated to provide information to), or as may be required by law.

Liberty Mutual may also disclose your personal information:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If any Liberty Mutual company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- In order to enforce or apply our terms of use set out in the terms of use or terms and conditions page and other agreements; or to protect the rights, property or safety of Liberty Mutual, our customers or others.

International transfers of data

For the purposes stated above, we may transfer your personal data to destinations outside the European Economic Area (“EEA”). Where we transfer your personal data outside of the EEA, we will ensure that it is treated securely, and in accordance with this privacy notice and the Legislation. We only transfer data to countries deemed as having adequate protection by the European Commission or, where there is no adequacy decision, we use the European Commission approved ‘Standard Contractual Clauses’ with such parties to protect the data. A copy of the ‘Standard Contractual Clauses’ can be obtained by writing to: **Global Privacy Officer, Liberty Mutual Group, 175 Berkeley Street, Boston, Massachusetts, 02116, or Privacy@libertymutual.com.**

Your Rights

You have the right to:

- **Refuse/change marketing preferences** – You may at any time ask us not to process your data for marketing purposes or change your preferences for marketing.
- **Request copy of personal data we hold about you** – You may request access to the personal data that we store about you.
- **Erasure of personal data** – You may request to have your personal data erased. In some cases, we may have the right to retain certain personal data despite your request of erasure.
- **Correction** – You have the right to request correction of or erasure of inadequate, incomplete or incorrect personal data.
- **Right to restriction and object to future processing** – You are under certain circumstances entitled to restrict the processing of your personal data to only comprise storage of the personal data. You can do so for instance during the time when we assess whether you are entitled to have personal data erased. If the processing of your personal data is based on a balancing of interests and you deem that your integrity interest overrides our legitimate interest, you may also, on grounds related to your particular situation, object to the processing. To do so contact us on the contact details stated below. Liberty Mutual must have a compelling reason in order to continue to process the personal data for the relevant purpose.
- **Right to data portability** – When personal data is processed electronically, and on the basis of your consent or on the basis that the processing is necessary in order to perform and administer the surety relationship, and provided that the personal data have been provided or generated by you, you are entitled to receive a copy of your personal data in a common machine-readable format.
- **Rights in relation to automated decision-making, including profiling** – You have the right to not be subject to fully automated decision-making, including profiling, if such decision-making has legal effects or similarly significantly affects you. This right does not apply if the decision-making is necessary in order to perform under a contract with you, if the decision-making is permitted under applicable law or if you have provided your explicit consent.
- **Complaints to the supervisory authority** – You are welcome to contact us with any enquiries and complaints that you may have regarding the processing of your personal data. You also have the right to lodge complaints pertaining to the processing of your personal data to the local Data Protection Authority.
- To exercise any of your rights listed above, please write to: **Global Privacy Officer, Liberty Mutual Group, 175 Berkeley Street, Boston, Massachusetts 02116** or to Privacy@libertymutual.com

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For example, we are interested in the number of visitors and the pages they visit; which pages are most and least popular. By applying what we learn about site visitor habits, we can adapt the content to try and make it more easily

accessible, relevant and interesting to site visitors. In some cases, cookies are used to remember information about your visit to our site between visits. We may need to do this to improve your use of the web site, such as remembering any feature preferences. By continuing to browse the site, you are agreeing to our use of cookies.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- **Analytical/performance cookies.** These are cookies that allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. The cookies we use do NOT hold any personally identifiable data about you.

Retention

Your data will not be retained for longer than is necessary, and will be managed in accordance with our data retention policy. In most cases the retention period will be for a period of ten (10) years following the expiry of our business relationship with you, unless we are required to retain the data for a longer period due to business, legal or regulatory requirements. In any case, where data is retained we will endeavor to delete or to anonymize any personal elements, in order to maintain your privacy and security.

Changes to our privacy policy

We may revise the privacy policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make.

If you have any questions concerning our use of your personal data, please contact **Global Privacy Officer, Liberty Mutual Group, 175 Berkeley Street, Boston, Massachusetts 02116** or to Privacy@libertymutual.com