## **Effective January 2021**

This notice is provided by American Fidelity International (Bermuda) Ltd (AFIBL), the data controller, and applies to current and prospective policyholders and visitors to our website.

This notice describes the personal data that we collect and rights that you may have regarding your personal data. Please read this notice carefully.

## **Personal Data that We Collect**

# Data Collected when You Apply for an Insurance Policy

When you apply for an insurance policy with us, we will collect personal data concerning you from you, your insurance broker, your employer, parties you authorize, medical providers, and others in possession of information necessary for our underwriting and policy issuance process. The information we collect is the information requested on our policy application document. If you do not provide the requested information, we may not be able to provide you with price quotes, to sell you an insurance policy, or to meet our obligations regarding selling and servicing the insurance policies that you seek to purchase from us. When you become our customer, we may collect additional information that is necessary for us to investigate and process claims, or to perform other services related to our contractual relationship. This necessary information may be collected from you, your beneficiary, your authorized representative, or from other third parties, such as medical doctors, consumer information bureaus.

#### Data Collected when You Visit Our Websites.

When you visit any of our websites that require you to log in, we may collect personal data that you voluntarily provide to us when you respond to questions on claim forms or provide to us through other interactions you have with us on our websites. This personal data is used for purposes such as reviewing and responding to claims submitted, and for conducting other activities necessary to providing you with service.

To help analyze how you and other site visitors navigate our websites, to compile aggregate statistics about our site usage and response rates, to help diagnose any problems with our servers, and to administer our website, we, with assistance from third-party analytics service providers, may collect certain information when you visit our site. This information may include IP address, geographic location of your device, browser type, browser language, date and time of your request, time(s) of your visit(s), page views and page elements (e.g., links) that you click.

We may use cookies, pixel tags, web beacons, clear GIFs or other similar tools on our site to assist us in collecting and analyzing such information. We use this information to provide better, more relevant content on our site, to identify and fix problems, and to improve your overall experience on our site.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you in the manner and for the purposes set out above.

## **Marketing and Data Transfer Practices**

We do not sell, share, or trade your personal data to any unaffiliated third parties for any marketing purposes. We may use personal data that you have provided to us, including your email address, to provide you with information about the products and services of AFIBL or our affiliates.

We may share your personal data with business partners that help us sell or service our policies, or perform other services necessary to our business. We may also share your personal data with entities that host our data or otherwise perform technology services for us. We also share our data with insurance agents and brokers.

#### **Data Protection Statement**

We take our responsibilities regarding protecting your personal data very seriously. We employee physical, administrative, and technical safeguards to safeguard your data.

## **Data Retention**

Personal data will be retained as long as necessary to meet the purposes for which it was collected and to meet AFIBL's legal obligations.

## **Data Subject Rights**

Depending upon relevant laws in your country of residence, you may have rights, under certain circumstances, relating to your personal data, including the following rights:

- The right to access your personal data.
- The right to rectify or update your personal data when it is inaccurate or incomplete.
- The right to ask us how we use your personal data and if we share it with anybody.
- The right to obtain your personal data or to have your personal data transferred to another entity.
- The right to deny consent or to review or revoke your consent.
- The right to oppose the processing of your personal data.
- The right to cancel (*i.e.*, to delete or permanently remove your personal data). However, due to legal requirements around the records of insurance companies, please be aware that we may not be able or legally allowed to delete certain types of personal data related to our policy applicants or customers.
- The right to complain to applicable data protection authorities if you feel that our handling of your personal data is contrary to any applicable laws, regulations, or rules.

Depending on the applicable laws in the location in which you reside, you may have other rights as well.

Please be aware that your ability to exercise such data subject rights may be restricted, in whole or in part, or otherwise impacted by requirements or limitations set forth in relevant laws, or by governmental investigations or other factors.

You may contact us to exercise any rights to which you are entitled by relevant law by using the contact information provided below. You also may contact us or consult with your local data protection authority for more information about how these rights and responsibilities apply to you.

## **Contact Information**

If you would like to contact us to exercise any applicable data subject rights or regarding any privacy or data protection questions or concerns you may have, you may contact us using the following information:

privacy@americanfidelity.com

**Privacy Officer** 

American Fidelity International (Bermuda) Ltd

Power House

7 Par-la-Ville Road

Hamilton, Bermuda HM 11