

Privacy Statement for Shareholders

Introduction

Minova Insurance Holdings Limited (the “Company”) treats the personal data of its shareholders very seriously.

We need to gather and use information or ‘data’ about you to manage our relationship with you. We intend to comply with our legal obligations under the **Data Protection Act 2018** (the ‘2018 Act’) and the **EU General Data Protection Regulation** (‘GDPR’) in respect of data privacy and security. We have a duty to notify you of the information contained in this Statement.

We have established appropriate operational and systems security measures to ensure that your personal data is used by us lawfully and for its intended purposes, and also protected from loss or breach in order to safeguard your privacy.

For the purposes of your personal data obtained in connection with your proposed and/or actual employment, the Company is referred to as the “data controller”. Where your personal data is shared with third parties, including other members of the Minova Group of companies, to which the Company belongs, the Company will at all times remain the data controller, and the third parties will either be a “data processor”, a “joint data controller” with the Company, or a data controller in addition to the Company, depending on the contractual relationship between the third party and the Company and the nature of the processing to be undertaken by the third party on the Company’s behalf.

This Statement explains how we hold, process and protect your personal data. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing or storing personal data in the course of working for, or on behalf of, the Company.

This Statement does not form part of your contract of employment (or contract for services if relevant) and can be amended by the Company at any time. It is intended that this Statement is fully compliant with the 2018 Act and the GDPR. If any conflict arises between those laws and this Statement, the Company intends to comply with the 2018 Act and the GDPR.

Data Protection Principles

Personal data must be processed in accordance with six ‘**Data Protection Principles**.’ It must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

We are accountable for these principles and must be able to show that we are compliant.

How we define personal data

‘**Personal data**’ means information which relates to a living person who can be **identified** from that data (a ‘**data subject**’) on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.

This Statement applies to all personal data whether it is stored electronically, on paper or on other materials.

This personal data might be provided to us by you, or someone else (such as a former employer, your doctor, or a credit reference agency), or it could be created by us. It could be provided or created during the recruitment process or during the course of the contract of employment (or services) or after its termination. It could be created by your manager or other colleagues.

We will collect and use the following types of personal data about you:

- your contact details and date of birth;
- your gender;
- your marital status and family details;
- information about your contract of employment (or services) including start and end dates of employment, role and location;
- your bank details and information in relation to your tax status including your national insurance number;
- your identification documents including passport and driving licence and information in relation to your immigration status and right to work for us;
- information relating to disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings); and
- any other category of personal data which we may notify you of from time to time.

How we define special categories of personal data

‘Special categories of personal data’ are types of personal data consisting of information as to:

- your racial or ethnic origin;
- your political opinions;
- your religious or philosophical beliefs;
- your trade union membership;
- your genetic or biometric data;
- your health;
- your sex life and sexual orientation; and
- any criminal convictions and offences.

We may hold and use any of these special categories of your personal data in accordance with the law.

How the Company obtains your personal data

The Company obtains your personal data directly from you, third parties and public records.

You provide the Company with personal data both in anticipation and during the course of your period as a shareholder.

The Company only obtains information from third parties if this is permitted by law and which operate in compliance with all applicable data protection laws.

How we define processing

‘Processing’ means any operation which is performed on personal data such as:

- collection, recording, organisation, structuring or storage;
- adaption or alteration;
- retrieval, consultation or use;
- disclosure by transmission, dissemination or otherwise making available;
- alignment or combination; and
- restriction, destruction or erasure.

This includes processing personal data which forms part of a filing system and any automated processing.

How the Company processes your personal data

The Company will process your personal data (including special categories of personal data) only where it has established a legal basis to do so and only in accordance with our obligations under the 2018 Act and the GDPR.

The Company's policy is that it will process your personal data only in connection with your actual or potential holding of shares in the Company or any of its subsidiary companies. This will include sending your personal data to other members of the Minova Group of companies, to which the Company belongs, or to other selected third parties, which may be outside of the EEA. The Company will only share your personal data with third parties where it has undertaken suitable due diligence as to their compliance with appropriate standards of data protection.

Your personal data will only be shared within the Minova Group of companies in relation to your holding of shares in the Company or any of its subsidiary companies, such as entering details of your holdings in the registers of the Company, payment of dividends or any other type of transaction relating to you shares.

The Company does not use your personal data for marketing purposes.

We will use your personal data for:

- administration of your shareholding in the Company;
- complying with any legal obligation; or
- if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing. See details of your rights in section "Data subject rights" below.

We can process your personal data for these purposes without your knowledge or consent. We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

If you choose not to provide us with certain personal data you should be aware that we may not be able to carry out certain parts of the relationship between us. For example, if you do not provide us with your bank account details appropriate ID documents, we may not be able to pay you dividends on your shares or purchase consideration for your shares. It might also stop us from complying with certain legal obligations and duties which we have such as to pay the right amount of tax to HMRC or to make reasonable adjustments in relation to any disability you may suffer from.

Examples of when we might process your personal data

We have to process your personal data in various situations before, during and after your period as a shareholder.

For example (and see below for the meaning of the asterisks):

- to decide whether you are eligible to hold shares;
- to decide whether parties associated with you are eligible to hold shares;
- to determine the tax withholding obligations in respect of transactions in or relating to shares;
- to pay dividends
- to make payments in consideration for your shares;
- to receive payment from you in relation to share purchases;
- to maintain statutory records and make statutory filings to the registrar of companies;
- to paying tax and national insurance;
- the prevention and detection of fraud or other criminal offences;
- to defend the Company in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure;
- for any other reason which we may notify you of from time to time.

We do not anticipate process special categories of your personal data in connection with the above stated purposes. In the event that we need to do so, we can do so if we have your explicit consent or if we are processing your data for any of the following purposes:

- where it is necessary for carrying out rights and obligations under employment law and social security law;
- where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent;
- where you have made the data public;
- where processing is necessary for the establishment, exercise or defence of legal claims; and

We do not take automated decisions about you using your personal data or use profiling in relation to you.

How long does the Company retain your personal data?

It is the Company’s policy to retain your personal data only for as long as is necessary for the purposes for which it has been obtained, taking into account relevant legal and regulatory obligations and other legitimate interests of the Minova Group of companies. A written document retention framework is in operation, which takes into account the various factors which influence retention periods and which has been reviewed independently to ensure that the bases and periods for retaining personal data are reasonable. It is the Company’s policy that all copies of personal information are destroyed to the extent is technologically feasible in accordance with the document retention framework.

How does the Company protect your personal data?

The Minova Group of companies has established a framework of systems security measure designed to protect the Group’s information (including employee data) from external disruption (cyber attack). These are constantly assessed against new developments in the scale and nature of potential threats.

The Company has also established a set of operational controls and procedures designed to ensure that your personal data is viewed and processed only by those have a legitimate need to do so. Protection of your personal data within the workplace is viewed very seriously and to the extent that failure to adhere to the appropriate operational standards could result in disciplinary action.

Data subject rights

Current data protection regulations in the EU, including the United Kingdom, provide data subjects with certain rights relating to the processing of their personal data. These include:

Right to access data

Data protection regulations provide you with the right to access certain personal data that we hold on you. This is referred to as a “data subject access request”.

The Company has established policies and procedures to respond promptly and effectively to any such request, which should in the first instance be addressed to The Company Secretary.

Right to rectification

You shall have the right to obtain from us, without undue delay, the rectification of inaccurate personal data relating to you as data subject. Taking into account the purposes of the processing, you, the data subject, shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

The Company has established policies and procedures to respond promptly and effectively to any such request, which should in the first instance be addressed to The Company Secretary.

Right to erasure

You have the right to request the erasure of your personal data where processing of that personal data is subject to your consent.

The Company has established policy and procedures to respond promptly and effectively to any such request, which should in the first instance be addressed to The Company Secretary.

Right to restrict processing

You have the right to restrict processing where one of the following applies:

- a) the accuracy of the personal data is contested by you, the data subject, and is restricted until the accuracy of the data has been verified;
- b) the processing is unlawful and you, the data subject, oppose the erasure of the personal data and instead request the restriction in its use;
- c) we no longer need the personal data for the purposes of processing, but it is required by you, the data subject, for the establishment, exercise or defence of legal claims;
- d) you have objected to processing of your personal data pending the verification of whether there are legitimate grounds for us to override these objections.

The Company has established policy and procedures to respond promptly and effectively to any such request, which should in the first instance be addressed to The Company Secretary.

Right to data portability

In certain circumstances, you have the right to receive a copy of the personal data which you have provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller, without hindrance from the Company. It has however been established that this right will not apply to the personal data that we hold.

Right to object

You have the right to object to the processing of your personal data, unless such processing is necessary for the performance of a task carried out in the public interest or an exercise of official authority vested in the Company. It is the Company's policy to cease processing the personal data in question unless the Company can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of you, the data subject, or for the establishment, exercise or defence of legal claims.

The Company has established policy and procedures to respond promptly and effectively to any such request, which should in the first instance be addressed to The Company Secretary.

Right to not be subject to decisions based solely on automated processing

You have the right in certain circumstances to object to decisions about you being made solely on the basis of automated processing. It has however been established that this right will not apply to the personal data or processing that the Company holds.

Accuracy of information

In order to provide the highest level of customer service possible, the Company needs to keep accurate personal data about you. The Company takes reasonable steps to ensure the accuracy of any personal data or sensitive information it obtains, and ensures that the source of any personal data or sensitive information is clear and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information, such as name or address changes and you can help us by informing us of these changes when they occur.

Other Important information

You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.

In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later. To withdraw your consent, you should contact the Company Secretary.

Questions and queries

If you have any questions or queries which are not answered by this Privacy Statement, or have any questions or potential concerns about how the Company may use the personal data it holds, please write to the Company Secretary.

Changes to this Statement

This Statement is regularly reviewed to make sure that it properly reflects the processing of your personal data by the Company and relevant third parties continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend the policies reflected in this Statement.

If you have a complaint

If you have a complaint regarding the use of your personal data by the Company then please contact The Company Secretary who will investigate your complaint and respond to you accordingly.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioners Office (ICO). Full contact details including a helpline number can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has further information on your rights and our obligations.