



# Fair Processing Notice



# Privacy Statement

IRIA S.A. (“we”, “us”, “our”) are part of Howden, an international insurance group that supports clients while using insurance as a tool to increase resilience for individuals, businesses, and communities .

In order to provide our services, we need to collect, process and share information, including information which may identify individuals (“personal data”). This notice applies to you in the event that we have collected personal data from or about you. It explains when, why and how we collect and process your personal data, the third parties with which we may share your personal data, what your rights are in the event we hold your personal data, and how you can enforce these rights.

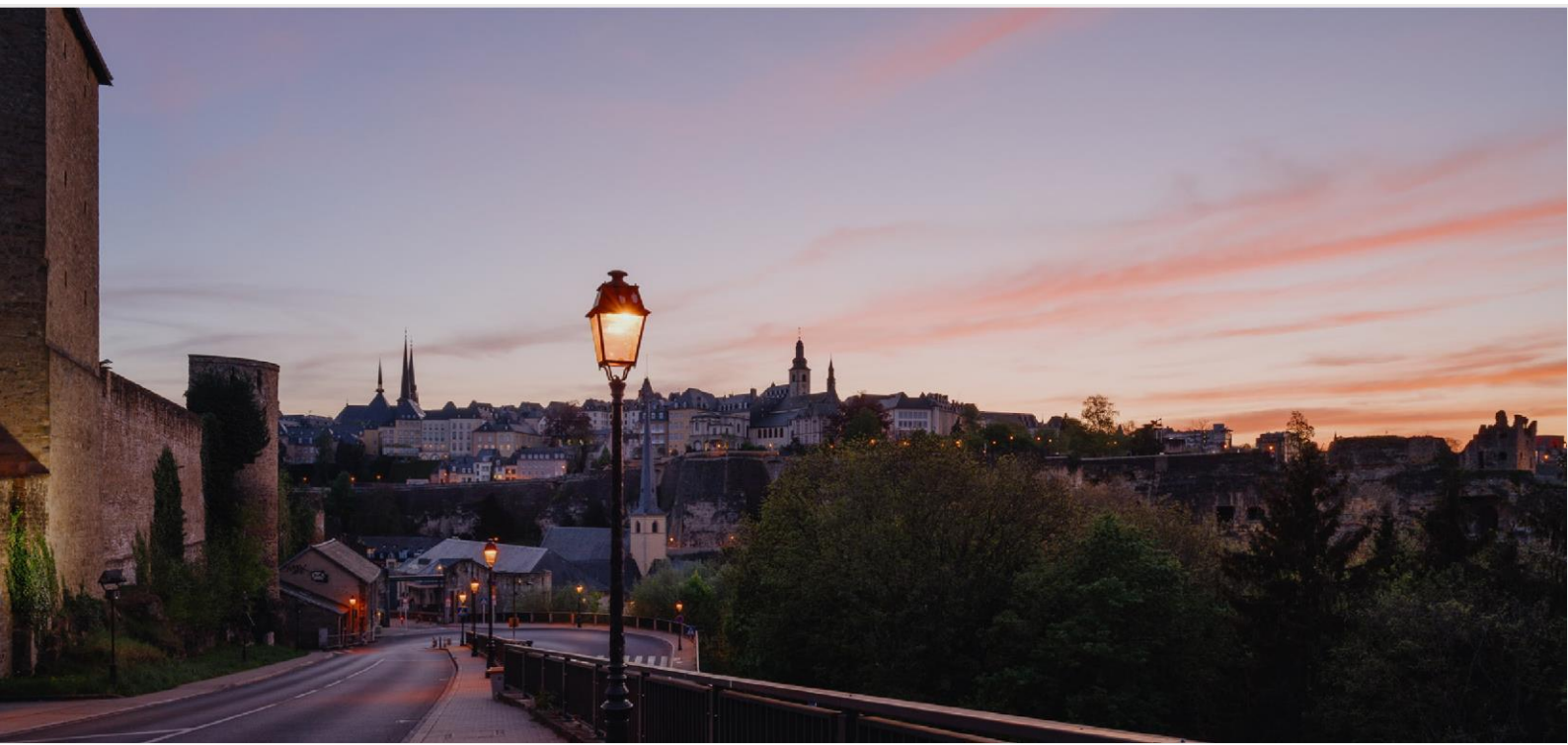
We may amend this notice from time to time in order to reflect any changes in how we process personal data, or to satisfy any new requirements under applicable data protection laws. If we make any significant changes, we will let you know directly.

This version of the Privacy Notice was published in September 2023.

# 1. Definitions

To be clear on what we mean in this notice:

- “personal data” means any information that can be used to identify a living individual;
- “sensitive personal data” means personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, health data, sex life, sexual orientation or criminal convictions/offences;
- “controller” means an organisation that decides why and how to collect personal data from or about an individual;
- “processor” means an organisation that is engaged by a controller to process personal data on its behalf;
- “the Howden Group” means Howden Group Holdings Limited and any company or organisation in which Howden Group Holdings Limited holds significant share capital;
- “third-party” means someone who isn’t you, us, or another company in the Howden Group.



## 2. Our details

We ('IRIA S.A.') are an independent insurance broker, and are authorised and regulated by the Swiss Financial Market Supervisory Authority ('FINMA') as an insurance intermediary with registration number 1558. Our registered office is at Place de Longemalle 16, 1204 Geneva, Switzerland. We act as a controller of personal data, and should you have a data protection query, wish to enforce one of your rights or wish to make a data protection complaint, then please send an email to [DPO@howdengroup.com](mailto:DPO@howdengroup.com).

## 3. Who does this notice relate to

This notice relates to the following types of individuals, where we hold your personal data:

- Employees of our potential, current and former clients, for example directors, day-to-day contacts, or those authorised to act on their behalf;
- Individuals who are ultimate beneficial owners of companies to which we provide our services;
- Third parties who make a claim against, or are subject to a claim from, one of our policyholders;
- Visitors to our website, or to conferences that we may arrange;
- Individuals who contact us with a query, concern or complaint;
- Individuals named on insurance policies that we arrange;
- Individuals who apply for a job with us, and our employees.

## 4. What personal data do we collect

Depending on your relationship with us, we may collect the following types of information from, or about, you:

- **Identity and contact data:** for example, your name, gender, date of birth, job title, telephone number, e-mail address, and in some cases identity documentation;
- **Location data:** for example, your residential or work address;
- **Correspondence data:** for example, copies of letters and e-mails we send you or you send to us;

- **Information we obtain from other sources:** for example, information we receive from anti-fraud and financial crime prevention agencies;
- **Complaint data:** for example, details of a complaint that you submit to us, how we investigated it and how we resolved it, including any contact with third-party adjudicator services;
- **Insurance and claims data:** any information not captured above which is required by us in order to arrange insurance cover or facilitate the handling of a claim to which are you involved;
- **Sensitive personal data:** in some cases it may be necessary for us to collect data relating to criminal convictions or offences as part of undertaking 'know your customer' checks which are required by our regulators; and
- **Internet data:** for example, information collected by cookies and other online technologies when you use our website, such as your IP address.

## 5. How do we collect personal data

We may collect personal data from, or about, you at different times and through different channels depending on our relationship with you, for example if:

- You request an insurance quotation from us on behalf of your employer, either directly or via an intermediary;
- You are named on the insurance policy of our client;
- Your employer identifies you as the contact person for an insurance policy that we have arranged;
- We receive notification of a claim that you bring against one of our policyholders;
- You are a client of a business that we acquire;
- You contact us in writing or speak to us on the phone;
- You visit one of our stands at a conference;
- You give permission to other companies to share your information with us;
- Your information is publicly available and we have a lawful reason to use it;
- We are provided with your personal data by third parties such as anti-fraud and crime-prevention agencies, credit reference and vetting agencies, and other data providers.

## 6. Why do we collect personal data

We need to collect and process personal data for the following purposes:

- **To enter into or perform a contract with you;** for example, if you are our employee we need to collect personal data from you in order to discharge our duties as your employer;
- **To comply with a legal obligation;** for example, to detect and prevent fraud, money laundering and other financial crimes, to fulfil your data rights under data protection laws, to respond to complaints or claims, and to comply with other legal requirements including those set by our regulators;
- **To achieve our legitimate business interests;** for example, to arrange and administer insurance where your employer is our client, to respond to third party claimants, to maintain accurate records in our systems, to monitor and improve our products and services through the use of analytics, to demonstrate compliance with regulations, and to facilitate internal management reporting across our business;

## 7. Who do we share personal data with

Below are the categories of third parties we may share your personal data, but only where we have a legitimate reason for doing so:

- Other Howden Group companies as explained under Section 8;
- Business partners, brokers, intermediaries, suppliers and agents involved in delivering products and services to you;
- Insurers, Managing General Agents and those acting on their behalf, for example loss adjusters, solicitors and claims experts;
- Credit reference, credit scoring and fraud prevention agencies;
- Debt collection agencies;
- Law enforcement, government bodies, courts, tax authorities and our regulators, for example FINMA;
- Service providers who help us manage our IT and back office systems, or who provide platforms to us that we then use or make available to you;
- Marketing fulfilment, webinar and customer satisfaction service providers, acting on our behalf in facilitating online events, providing marketing communications and capturing feedback from our customers on our service levels,
- Any third party where disclosure is required to comply with legal or regulatory requirements;
- Potential purchasers of our business.

## 8. Sharing data with the Howden Group

As stated in the previous section, we may share personal data with other companies within the wider Howden Group for the following purposes:

- To receive administrative support from those companies, such as the receipt of IT, HR, Finance and Compliance services;
- So that these companies can provide market insight to insurers on a confidential basis, but only where personal data has been aggregated or anonymised; and
- So that we can offer you services that may be available from another company in the Howden Group, but only if permitted under marketing laws.

We will only share the minimum amount of personal data required to achieve these purposes, ensuring that we have a lawful basis to share personal data and that any processing undertaken on our behalf is governed by a data processing agreement.

## 9. International data transfers

We may need to transfer your personal data to an overseas party in order to fulfil the purposes described throughout this notice. For example:

- We may need to transfer your personal data to the UK in order to receive administrative support from other companies in the Howden Group;
- We may need to transfer your personal data overseas in order to arrange insurance cover for you, with the destination being dependent on the location of the market participants involved in the chain.

If the overseas country is not considered by the Swiss Federal Council to provide an adequate level of protection, we will adopt appropriate safeguards to protect the personal data, for example by implementing model clauses (as recognised by the Federal Data Protection & Information Commissioner) with the overseas party.

## 10. Retaining personal data

We retain personal data to meet a number of legal and regulatory requirements, as well as our own legitimate business interests. In most cases we will retain your personal data for 7 years following the end of our relationship with you, however depending on the service you have received from us we may need to retain your personal data for longer. For example, if the insurance we arrange allows for a claim to be notified several years after it occurred.

# 11. Your rights

Data protection law gives you rights relating to your personal data. Should you wish to enforce a right (generally at no cost to you), or make a data protection complaint, please contact [DPO@howdengroup.com](mailto:DPO@howdengroup.com). We aim to provide a final response within one month of receiving a request, unless the request is particularly complex in which case we will let you know when we expect to complete it by:

<b>Access</b>	You have a right to request a copy of the personal data that we hold on you, along with meaningful information on how it is used and who we share it with, however there are some instances where we may not be able to provide you with some or all of the information we hold. Where this is the case we will explain to you why when we respond to your request, unless the relevant laws or regulations prevent us from doing so
<b>Rectification</b>	You have a right to ask us to correct inaccurate or incomplete personal data that we hold about you. We will either confirm to you that this has been done, or if there is a valid reason that this cannot be done, we will let you know why
<b>Erasure</b>	You can request that we delete your personal data in certain circumstances, for example if we no longer need the personal data for the purpose(s) for which we collected it. We will either confirm to you that this has been done, or if we are unable to delete it due to a compelling overriding reason we will let you know why
<b>Restrict processing</b>	You can ask us to restrict the processing of your personal data in certain circumstances. If you do so, we will either confirm that this has been done, or if we are unable to do so, we will let you know why
<b>Data portability</b>	In certain circumstances you have the right to request that your personal data be transferred to yourself or a nominated third party in a common, machine readable format. If you request this, we will either act upon your instruction and confirm to you that we have done so, or if there is a valid reason that this cannot be done, we will tell you why



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**Objection**

You have the right to object to us processing your personal data. If you do so, we will either confirm to you that the processing has stopped, or explain why we believe our interest in the relevant activity outweighs your interest

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**Consent**

You have the right to withdraw your consent in the event that we are relying on your consent to justify our processing of your personal data. Please note that in order to rely on your consent in the first place, we are required to ensure that this is informed, freely given and specific

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**Automated decision-making**

Please note that we do not undertake automated decision-making that has a legal or similar effect on an individual

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Should you submit a request or complaint to us and remain unhappy with our response, you may raise a complaint directly with the Federal Data Protection & Information Commissioner by navigating to the online form on their website [here](#) or by emailing [info@edoeb.admin.ch](mailto:info@edoeb.admin.ch)



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