



DATA PRIVACY POLICY

April 2020

Beluga Insurance Solutions nv (“Beluga”) Data Privacy Policy

Definition

Personal Data is defined as any information relating to an identified or identifiable natural person.

Client Data is defined as Personal Data and any information relevant to a Client or prospective Client held by Beluga.

Application

This Policy is applicable to all partners and staff within Beluga Insurance Solutions nv in Belgium.

This Policy is also applicable to all insurance policies written on a freedom of services or establishment basis where Beluga Insurance Solutions nv is the Mandated Underwriter in Belgium.

Data Privacy

The purpose of this policy is to outline Beluga’s Data Privacy Policy and explain how Client Data will be used.

Beluga will be the data controller of any Personal Data it receives with regards to the Data Protection Act in Belgium (Wet van 30 juli 2018 betreffende de bescherming van natuurlijke personen met betrekking tot de verwerking van persoonsgegevens/ Loi du 30 juillet 2018 relative à la protection des personnes physiques à l'égard des traitements de données à caractère personnel).

Staff Responsibilities

Our policy is based upon Beluga’s most recent **Privacy Notice** as published on our website and all staff should familiarize themselves with its content to get a clear understanding of how we collect, use, protect or otherwise handle Client Data.

Any uncertainty on how Personal Data should be treated must be discussed and validated with our Data Protection Officer

Breaches

Members of staff or partners should bring any breaches of this Policy to the attention of their Compliance contact.