## **Privacy Policy**

(Last Modified December 23, 2021)

Privacy and data protection are of the utmost importance to Clarion Insurance Broking Services Pvt Ltd its subsidiaries; herein after are called as "Clarion Broker". This Privacy Statement for Clarion Broker ("Privacy Statement") details the company's policies with respect to the handling of personally identifiable information ("Information") submitted by the customer of this Privacy Policy ("You") or otherwise collected by Clarion Broker either via the company's website or through mobile application in the course of providing services to Clarion Broker's customers. Clarion Broker will use and disclose Information only in accordance with the terms of this Privacy Statement.

### A. COLLECTION OF INFORMATION

The type of Information submitted to or collected by Clarion Broker varies depending upon the nature of the activity and relationship with Clarion Broker.

- 1. <u>Browsing the Website & Use of Mobile Application</u>: When You browse the company's website or use mobile application, Clarion Broker may collect information regarding the domain and host from which You access the Internet, the Internet Protocol address of the computer or Internet Service Provider You are using, and anonymous site statistical data. This information is collected for the purpose of assessing the effectiveness of the company's website and mobile application for security reasons.
- 2. <u>Inquiries</u>: The website/mobile app contains various forms, links to company e-mail addresses, that You may use to solicit information about the website, and the company in general. When You complete and submit a form, send us an e-mail, send us a fax, or contact us by telephone, Clarion Broker may store the inquiries and their contents, including any personally identifiable information You may have provided. Any personally identifiable information You submit via an inquiry is collected only with Your knowledge and active participation.
- 3. <u>Use of Policy issuance Services</u>: When You register to use Clarion Broker online processing services ("Policy issuance Services"), You will be required to provide personally identifiable information and to enter into a written agreement with Clarion Broker. If You ordered any products or services from businesses that use our Policy issuance Services ("Clarion Broker Customers"), You were required to submit personally identifiable information ("Order Information"). Clarion Broker Customers transmit Order Information to Clarion Broker for the purpose of processing Orders. Order Information is maintained in servers located within India. Clarion Broker may maintain Order Information for a certain period of time to comply with audits, legal requirements, or for disaster recovery purposes.

4. <u>Notice for Users</u>: The Data Protection Act puts obligations on users of personal information and sets forth principles for its use. One principle states that information must be processed fairly and lawfully. This means that You are entitled to know how we intend to use any information You provide. You can then decide whether You want to give personal information to us.

The Data Protection Act does not generally apply to data about limited companies or partnerships, but it does cover personal data relating to sole traders and partnerships. When we receive an application from a business, we may perform a search with a credit reference agency and fraud prevention agency on the individual company directors or partners.

Order Information provided by You to Clarion Broker Customers and any Information that You provide to Clarion Broker directly will be transferred outside of the European Union to the United States. By providing personal information to Clarion Broker Customers or us, You are consenting to the transfer of such information outside of the EU and to its storage and use as described herein.

#### B. USE AND DISCLOSURE OF INFORMATION

Usage and disclosure of Your Information varies based on Your relationship with Clarion Broker. Clarion Broker never sells any personally identifiable information and, except as expressly set forth below, never discloses personally identifiable information to any third parties.

- 1. <u>Browsing the Website & Use of Mobile Application</u>: Information collected while You're browsing our website or via use of mobile application, may be used to analyse trends, administer the website, improve site performance, gather broad demographic information, and for security purposes. Such Information may be disclosed to third parties to provide any of the aforementioned activities on behalf of Clarion Broker.
- 2. <u>Inquiries</u>: If You submit an inquiry via online form, e-mail or telephone call, the information collected may be used by Clarion Broker to respond to Your inquiry or to contact You to inform You of YYY. Information collected during the course of an inquiry will not be disclosed to any third party unless such third party has been contracted by Clarion Broker, with obligations of confidentiality, to contact You on our behalf.
- 3. <u>Use of Information</u>: If You are a Clarion Broker customer, Clarion Broker will use Your Information during the course of providing You with the Policy issuance Services. During the course of providing such services, Clarion Broker may disclose Your Information to third parties that have contracted with Clarion Broker to perform certain functions of the Policy issuance Services on our behalf ("Insurers"). Clarion Broker may also use Your Information to contact You about other Clarion Broker offerings and to inform You about general company news and industry trends, directly or through the use of third party vendors. Clarion Broker may also use Your Information for internal business analyses. If You are a customer of a Clarion Broker Customer, Clarion Broker will use Order Information during the course of providing processing services to such Clarion Broker Customer. Clarion Broker may also use Order Information at an aggregate level for internal business analyses and fraud prevention. During the course of providing Policy issuance Services to Clarion Broker Customers, Clarion Broker may disclose Order Information to banks, processors, card

associations, and other financial institutions that are involved in the course of processing or screening the transaction applicable to the Order Information.

- 4. <u>Surveys and Questionnaires</u>: If You submitted an inquiry to Clarion Broker or if You are a Clarion Broker Customer, periodically, Clarion Broker may use Your Information to contact You, directly or through a third party vendor, to complete a survey or questionnaire. Responses to any such survey or questionnaire may be used for internal business analyses and may be disclosed in aggregate form without disclosing Your personally identifiable information.
- 5. <u>Use of Cookies</u>: Forms on our website/mobile app may use cookies. Cookies are small files of data that reside on Your computer and allow Clarion Broker to recognize You as a Clarion Broker Customer or a previous visitor of our website. Clarion Broker may use cookies to populate frequently used forms or to provide You with other customized viewing options for Your convenience. Clarion Broker uses cookies solely to maintain personalized services throughout the website.
- 6. <u>Confidentiality Obligations</u>: All contracts entered into between Clarion Broker and Clarion Broker Customers, Clarion Broker and Subcontractors, and Clarion Broker and other third party service providers contain express provisions governing the confidential treatment of any and all personally identifiable information.
- 7. <u>Investigations and Proceedings</u>: Clarion Broker may use Information to conduct internal investigations. Clarion Broker may disclose Information to cooperate with an investigation by law enforcement agencies or other governmental authorities and may also disclose Information in response to a subpoena, warrant, court order, or other comparable legal processes.

### C. INFORMATION SECURITY

Clarion Broker is committed to privacy and security. Clarion Broker is compliant with the Payment Card Industry Data Security Standard ("PCI DSS") as a Level 1 service provider.. PCI DSS is the bankcard industry's most stringent security standard. Examples of Clarion Broker security measures include: physical, electronic, and procedural safeguards; sophisticated security monitoring tools; documented security policies; use of strong encryption for transmissions of Order Information to and from Clarion Broker Customers; restricting access to personally identifiable information; and, periodic security audits by third party security experts.

# D. Additional Terms and Conditions of the proposal form (applicable for health insurance products only):

(i) You hereby declare, on your behalf and on behalf of all persons proposed to be insured, that the statements, answers and/ or particulars given by you are true and complete in all respects to the best of your knowledge and that you are authorized to propose on behalf of these other persons.

- (ii) You understand that the information provided by you will form the basis of the insurance policy, is subject to the Board approved underwriting policy of the insurer and that the policy will come into force only after full payment of the premium chargeable.
- (iii) You further declare that you will notify in writing any change occurring in the occupation or general health of the life to be insured/proposer after the proposal has been submitted but before communication of the risk acceptance by the insurance company.
- (iv) You declare that you consent to the insurance company seeking medical information from any doctor or hospital who/which at any time has attended on the person to be insured/proposer or from any past or present employer concerning anything which affects the physical or mental health of the person to be insured/proposer and seeking information from any insurer to whom an application for insurance on the person to be insured/proposer has been made for the purpose of underwriting the proposal and/or claim settlement.
- (v) You authorize the Clarion Broker/insurance company to share information pertaining to your proposal including the medical records of the insured/ proposer for the sole purpose of underwriting the proposal and/or claims settlement and with any Governmental and/or Regulatory authority.
- (vi) You consent to and authorize any of insurance company's authorized representatives not being direct employees of the company to seek medical information required for the purpose of policy issuance or claim settlement under this policy from any hospital/medical practitioner that you or any person proposed to be insured/insured has attended or may attend in future concerning any disease or illness or injury.
- (vii) You understand agree that (section 41 of Insurance Act):
- a) No person shall allow or offer to allow, either directly or indirectly, as an inducement to any person to take out or renew or continue an insurance in respect of any kind of risk relating to lives or property in India, any rebate of the whole or part of the commission payable or any rebate of the premium shown on the policy, nor shall any person taking out or renewing or continuing a Policy accept any rebate, except such rebate as may be allowed in accordance with the published prospectuses or tables of the insurers.
- b) Any person making default in complying with the provision of this section shall be liable for a penalty which may extend to ten lakh rupees."

### E. CORRECTION OF INFORMATION

If You want Clarion Broker to correct Your Information that is stored on Clarion Broker systems, please submit Your request in writing to: **customercare@veritasins.com** 

Subject to our ability to verify Your request, Clarion Broker will correct the Information within thirty (30) days of receipt of Your request.