Liberty Mutual Surety Europe Privacy Notice

Liberty Mutual Surety takes the protection of your personal data seriously and is committed to protecting your privacy. This Privacy Notice sets out details of the information that we may collect from you and how we may use that information. Please take your time to read this notice carefully.

1. About Liberty Mutual Surety

Liberty Mutual Surety is an international surety business. We offer surety bonds to individuals, companies and other insurers.

In order for us to deliver surety bond services which involve providing you with a quote and then bonds, and dealing with any claims or complaints that might arise, we need to collect and process data. We also collect your information for recruitment purposes, in our contractual relationships with you and for relationship development, where appropriate. This makes us a "data controller".

The data controller applicable to you depends on the interaction you have with us or the policy written, and includes the following:

- Liberty Mutual Insurance Europe SE; and/or
- Liberty Specialty Markets Europe S.a.r.L.

The specific company acting as a data controller of your personal data will be listed in the in the documentation we provide to you.

If you are unsure about who the data controller of your personal data is, you can also contact us at any time by e-mailing us at dataprotectionofficer@libertyglobalgroup.com or by writing to Data Protection Officer, Liberty Mutual, 20 Fenchurch Street, London, EC3M 3AW.

2. Our processing of your personal data

This notice sets out the legal grounds enabling us to process your personal data.

We will collect information when it is legally or contractually required to provide services to you.

Where you provide personal data to us about other individuals, we will also be data controller of and responsible for their personal data. You should refer them to this notice before supplying us data on behalf of others.

We may amend the personal data so that you cannot be identified from the data either by itself or when combined with any other data we hold. That data will then not be subject to this notice or data protection law.

The notice is available in different languages to reflect our global presence.

2.1. What personal data will we collect?

- **Personal information** such as your name, address, contact phone numbers, email addresses, date of birth, gender, signature, national identification such as a Social Security Number, passport details, national insurance number, driver's license and information about your relationship to the policyholder where you are the beneficiary.

- **Financial information and account details** such as bank account number and account details, credit history and credit score, assets, income and other financial information.
- **Commercial information** such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories and tendencies.
- **Information which we obtain as part of checking sanctions lists**, such as those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.
- **Internet or other similar network activity**, including browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
- Any other information passed on from you, your insurance broker or someone else applying on your behalf.

2.2. What sensitive personal data will we collect?

We will not collect, process or store your sensitive personal data including but not limited to biometric data. However, if you choose to use the Qualified Electronic Signature service through our third-party service provider, biometric data (facial scan) will be collected, processed, and stored by the third-party service provider as part of the identity verification process. The third-party service provider will obtain your explicit consent before collecting your biometric data.

2.3. How will we collect your personal data?

We will collect information directly from you:

- When you apply for or renew a bond;
- When we are providing you with a quotation;
- When you pay your bond;
- Visit our websites or visit our office; and/or
- When you contact us by email, telephone and through other written and verbal communications.

As well as obtaining information directly from you, we will collect information from:

- The named policyholder where you are a beneficiary or named under a bond.
- Third parties involved in the bond application process (such as our business partners and representatives, brokers or other insurers).
- Publicly available sources such as the court judgments, insolvency registers, internet search engines, news articles and social media sites.
- Other Liberty Mutual Insurance Group companies.
- Third parties who provide sanctions checking services.
- Financial crimes detection agencies.
- Credit reference agencies in relevant jurisdictions.

2.4. What will we use your personal data for?

Purpose of Processing	Legal Basis for Processing
To manage and handle your application and questions. This includes for example: • calculating your premium; • determining your eligibility for a quote; • confirming your identity and service your policy.	• It is necessary to enter into or perform your insurance contract. • We have a legitimate interest (to assess the insurance application and manage the application process).
To evaluate prospective clients, including carrying out fraud, credit and anti-money laundering checks.	• It is necessary to enter into your insurance contract. • We have a legitimate interest (to assess the bond application).
To manage any claims you make under your bond.	• It is necessary to enter into or perform your contract • We have a legitimate interest (to assess and pay your claim and manage the claims process).
Regulatory and Legal Requirements. This includes for example: • controls and access rights management; • to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Liberty's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by Liberty is among the assets transferred; • exercising and defending our legal rights and positions; • to meet Liberty contract obligations; • to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; • as otherwise permitted by law.	We need to use your information in order to comply with our legal obligations.

To prevent and investigate fraud.	• It is necessary to enter into or perform your insurance contract. • We have a legitimate interest (to prevent and detect fraud and other financial crime).
For insurance administration purposes including analysis of trends, carrying out actuarial work, planning service delivery, risk assessment and costs and charges.	• We have a legitimate interest (to develop and improve the products and services we offer).
For business and management processes and activities including analysis, review, planning, business transaction and IT hosting, support and security.	• We have a legitimate interest (to develop and improve the products and services we offer).
To provide customer service and technical support.	• We have a legitimate interest (to effectively manage our business).
To communicate with you and resolve any complaints that you might have.	• It is necessary to enter into or perform your insurance contract. • We have a legitimate interest (to send you communications, record and investigate complaints and ensure that future complaints and handled appropriately).
To improve your customer experience and our products	• We have a legitimate interest (to effectively manage our business).

2.5. Who will we share your personal data with?

We will keep your personal data confidential and we will only share it where necessary for the purposes set out above with the following parties:

- Liberty Mutual Insurance Group Inc. and its subsidiaries and affiliates (both inside and outside the European Economic Area) and their service providers;
- Distribution partners- Intermediary and tied agents, brokers, affinity/business partners and other distributors, reinsurers, administrators, financial institutions and other business partners;
- Public entities and institutions (e.g. regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitrational bodies, and fraud prevention agencies);
- Professional advisors including law firms, accountants, auditors, and tax advisors;
- Third parties who provide sanctions checking services;
- Third party suppliers, agents and contractors appointed by Liberty Mutual Surety to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers;
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention);
- Insurers, re-insurers, policy holders, and claimants; and
- As permitted by law.

3. What marketing activities do we carry out?

We will send marketing communications directly to you by post, email or telephone. In most cases, we will only send you marketing communications for which you have clearly expressed your consent and therefore interest in receiving.

On other occasions, we will process your personal data to provide you with business information based on our legitimate business interests and the relationship we have with you as a customer.

However, if you wish to opt-out of receiving further marketing communications - by opting out of our processing your personal data for this purpose or by withdrawing your initial consent - you may do so by contacting us using the details set out in section 8 Contacting Us).

4. Data Transfer

Sometimes we (or third parties acting on our behalf) will transfer personal data that we collect about you to countries outside of the United Kingdom ("UK") or the European Economic Area ("EEA").

Where a transfer occurs, we will take steps to ensure that your personal data is protected. We will do this using a number of different methods including: putting in place appropriate contracts. We will use a set of contract wording known as the "standard contractual clauses" which has been approved by the data protection authorities.

If you would like further information regarding our data transfers and the steps we take to safeguard your personal data, please contact us using the details set out in section 8.

5. Retention

We will keep your personal data for as long as reasonably necessary to fulfil the purposes set out in section 2 above and to comply with our legal and regulatory obligations.

We have a detailed data retention policy that determines how long we will retain different types of personal data. The exact period of time for which we retain your personal data will depend on your relationship with us and the type of personal information we hold, for example, we will keep your data for a longer period if legal proceedings are underway.

If you would like further information regarding the periods for which your personal data will be stored, please contact us using the details set out in section 8 (Contact us).

6. How do we protect your personal data?

Liberty Mutual Surety takes security of your information very seriously. We maintain appropriate technical, organizational, and physical safeguards designed to protect the personal data we process in accordance with client instructions and in line with our legal and regulatory obligations. The security measures in place on our website and computer systems are in place to protect the loss, misuse, or alteration of the information you provide to us. We keep your personal data only for as long as reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

The Liberty Mutual Surety has a number of Information Security Standards that apply depending on the data type and data location. These standards cover access controls, encryption, network and host security, physical security, data recovery and business continuity. Our standards change from time to time as we react to market challenges and changing regulatory requirements.

In the event that you become aware of any actual or potential misuse of any such information or for more information on IT Security please contact us using the details set out in section 8.

7. Your rights

Under data protection law you have a number of rights in relation to the personal data that we hold about you which we set out below. You can exercise your rights by contacting us at any time using the details set out in section 8. We will not usually charge you in relation to a request.

Please note that although we take your rights seriously, there may be some circumstances where we cannot comply with your request such as where complying with it would mean that we couldn't comply with our own legal or regulatory requirements. In these instances we will let you know why we cannot comply with your request.

In some circumstances, complying with your request may result in your insurance policy being cancelled or your claim being discontinued. For example, if you request erasure of your personal data, we would not have the information required to pay your claim. We will inform you of this at the time you make a request.

The right to access your personal data

You are entitled to a copy of the personal data we hold about you and certain details of how we use it.

We will usually provide your personal data to you in writing unless you request otherwise. Where your request has been made electronically (e.g. by email), a copy of your personal data will be provided to you by electronic means where possible.

The right to rectification

We take reasonable steps to ensure that the information we hold about you is accurate and where necessary up to date and complete. If you believe that there are any inaccuracies, discrepancies or gaps in the information we hold about you, you can contact us and ask us to update or amend it.

The right to restriction of processing

In certain circumstances, you are entitled to ask us to stop using your personal data, for example where you think that the personal data we hold about you may be inaccurate or where you think that we no longer need to use your personal data.

The right to withdraw your consent

Where we rely on your consent in order to process your personal data, you have the right to withdraw such consent to further use of your personal data.

Please note that for some purposes, we need your consent in order to provide your policy. If you withdraw your consent, we may need to cancel your policy or we may be unable to pay your claim. We will advise you of this at the point you seek to withdraw your consent.

The right to erasure

This is sometimes known as the 'right to be forgotten'. It entitles you, in certain circumstances, to request deletion of your personal data. For example, where we no longer need your personal data for the original purpose we collected it for or where you have exercised your right to withdrawn consent.

Whilst we will assess every request, there are other factors that will need to be taken into consideration. For example we may be unable to erase your information as you have requested because we have a regulatory obligation to keep it.

The right to object

Marketing: You have control over the extent to which we market to you and you have the right to request that we stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" button in any email that we send to you or by contacting us using the details set out in section 8.

Please note that even if you exercise this right because you do not want to receive marketing messages, we may still send you service related communications where necessary.

Processing based on our legitimate interests: Where we process your personal data based on our legitimate interests, you can object to our processing. We will consider your objection and determine whether or not our legitimate interests prejudice your privacy rights.

The right to data portability

In certain circumstances, you can request that we transfer personal data that you have provided to us to a third party.

Rights relating to automated decision-making

We do not carry out any automated decision making. If this changes in the future, we will provide you with an updated notice setting out our decision making process.

The right to make a complaint with the Regulator

You have a right to complain to your local Data Protection Regulator if you believe that we have breached data protection laws when using your personal data.

The supervisory authority of Liberty Specialty Markets Europe S.a.r.L and Liberty Mutual Insurance Europe SE is:

Commission Nationale pour la Protection des Données (CNPD)

15, Boulevard du Jazz

L-4370 Belvaux

Last Updated March 2026

Phone. +352 2610 60 1

Email: info@cnpd.lu

http://www.cnpd.lu/

8. Contacting us

If you would like further information about any of the matters in this notice or if have any other questions about how we collect, store or use your personal data, you may contact our Data Protection Officer at dataprotectionofficer@libertyglobalgroup.com or by writing to Data Protection Officer, Liberty Mutual, 20 Fenchurch Street, London, EC3M 3AW.

Please note that we are not responsible for the privacy policies or content of any websites linked to this website, (including websites of companies within the Liberty Mutual Insurance Group).

9. Updates to the privacy notice

From time to time we may need to make changes to this notice, for example, as the result of changes to law, technologies, or other developments. We will provide you with the most up-to-date notice and you can check our website here periodically to view it.

This notice was last updated in March 2026.