

**Effective Date:** *January, 2021*

Stewart Title Europe Limited is a company registered in Malta under company number C97240 with its registered office located in St. Julian's, Malta

**OUR COMMITMENT TO PROTECT YOUR PRIVACY**

Your privacy is important to us. We understand how important it is to protect and safeguard any personal information that you provide to us. We are committed to ensuring that we are open and transparent about the manner in which we collect, store, manage and use personal information that you may provide to us or we may lawfully receive when you (i) browse our websites, (ii) make inquiries about our products and services, or (iii) order a product or service from us. In Europe we abide by the *General Data Protection Regulation* and the *Data Protection Act, 2018*, (Chapter 586) and accompanying subsidiary regulations.

**CHANGES TO OUR PRIVACY POLICY**

We regularly review our Privacy Policy; when we do, the date at the top of this page will be updated and the revised policy shall be effective as of that date.

**WHAT INFORMATION WE COLLECT AND WHY**

We collect personal information when (i) you request that we provide you with our products and services, (ii) you make a general inquiry about our products and services, or (iii) you file a claim under a policy we have issued to you.

We rely upon the following lawful bases for collecting your personal information:

Lawful Basis for Collection	Description	Example
Legitimate Interest	We have a genuine and legitimate reason to collect data and we always consider and balance that right against any potential impact on your privacy rights and interests.	<i>We collect details about your identity for fraud detection and prevention purposes.</i>
Contract Performance	We collect data in order to meet our contractual obligations.	<i>We collect details regarding your property in order to properly underwrite and insure it with a policy of insurance.</i>
Legal or Statutory Obligation	We must collect data based on an existing requirement in law.	<i>We provide personal information as part of a Court proceeding or Court order.</i>
Consent	We will ask for your express, freely-given consent to collect data and you will be entitled to withdraw this consent at any time.	<i>We seek and obtain your express consent to send you updates regarding new products or services that we offer.</i>

**Personal information** relates to any information about an individual whose identity can, directly or indirectly, be reasonably determined from it. **Sensitive information** relates to data about an individual's physiological/health, genetic, mental, economic, cultural or social identity (for example, racial or ethnic origin, religious beliefs or sexual orientation).

We will never collect any unnecessary personal information from you and we do not process your information other than as specified in this Privacy Policy. We **do not collect sensitive information** for the purposes of assessing a request for, or when providing you with, our products and services.

We have outlined below the personal information we may collect as it varies depending on the nature of our interaction with you and based on local requirements.

<b>BUSINESS TO CONSUMER CLIENT</b>	
<b>Personal Information We May Collect</b>	<b>Primary Purpose</b>
<p><b>Contact and Identifying Information</b></p> <ul style="list-style-type: none"> <li>• name, address, e-mail address, phone numbers and/or other contact information</li> <li>• proof of identity such as an Identity Card, passport, citizenship or equivalent identity card</li> </ul>	<ul style="list-style-type: none"> <li>• to deal with any enquiries about policy coverage or to provide you with a quote</li> <li>• to process applications for insurance and assess risk</li> <li>• to make underwriting decisions regarding the insurability of a transaction</li> <li>• for the purpose, where required, of obtaining reinsurance</li> <li>• to meet legal and regulatory requirements</li> <li>• any third parties that we engage on your behalf or which you engage directly in connection with the services we are providing to you, including solicitors and barristers, auditors, accountants, third party experts and other consultants or advisors</li> <li>• to investigate and adjudicate claims made under our policies, including investigations by third parties hired by our company</li> <li>• to investigate and detect potentially fraudulent transactions</li> <li>• to process, investigate and respond to any complaint made by you in relation to our products and services</li> <li>• to determine which of our products meet your needs</li> </ul>

<b>BUSINESS TO BUSINESS CLIENT</b>	
<b>Personal Information We May Collect</b>	<b>Primary Purpose</b>
<p><b>Financial Information</b></p> <ul style="list-style-type: none"> <li>• bank account or other financial information</li> </ul>	<ul style="list-style-type: none"> <li>• for facilitating premium payments</li> <li>• for issuing refunds of premium if you validly cancel a policy</li> <li>• for issuing refunds for any premium overpayments</li> </ul>

	<ul style="list-style-type: none"> <li>• to facilitate payment of any fees if you are a business service provider</li> <li>• for claims processing and settlement</li> </ul>
<p><b>Policy Related Information</b></p> <ul style="list-style-type: none"> <li>• property details such as purchase price of property, street address</li> <li>• title particulars or title chain documents and insurance policy details</li> <li>• copy of your contract for sale or purchase or refinancing</li> <li>• building inspection reports and other due diligence reports which you may have carried out in relation to a property which we are being asked to insure</li> <li>• communications, including, emails, letters, faxes, between you, your solicitor, notary, or conveyancer or between the other party's solicitor, notary, or conveyancer</li> <li>• copy of the conveyancing file from the notary, law or conveyancing firm who acted for you when you purchased or financed the insured property</li> </ul>	<ul style="list-style-type: none"> <li>• to process applications for insurance and to assess risk</li> <li>• to make underwriting decisions regarding the insurability of a transaction</li> <li>• for the purpose, where required, of obtaining reinsurance</li> <li>• to determine whether to provide exclusions, exceptions or conditions on cover</li> <li>• to investigate and adjudicate claims made under our policies, including investigations by third parties hired by us</li> <li>• to determine which of our products meet your needs</li> <li>• to investigate and detect potentially fraudulent transactions</li> <li>• to assist any third parties that we engage on your behalf or which you engage directly in connection with the services we are providing to you, including solicitors &amp; barristers, auditors, accountants, third party experts and other consultants or advisors</li> <li>• to investigate and adjudicate claims made under our policies, including investigations by third parties hired by us</li> <li>• for statistical analysis</li> </ul>
<p><b>Business to Business Contact and Identifying Information</b></p> <ul style="list-style-type: none"> <li>• name, address, e-mail address, phone numbers and/or other contact information</li> <li>• bank account or payment card details</li> <li>• financial information concerning your business</li> <li>• communication preferences (e.g. email, fax) and preferences regarding direct marketing from us</li> </ul>	<ul style="list-style-type: none"> <li>• to assess any requests to provide business services to our company</li> <li>• to assess market needs in order to tailor our products and services to meet demand</li> <li>• to share updates with you about our products and services which we believe may be of interest to you</li> <li>• to provide industry insight or to invite you to events</li> </ul>

**CONSEQUENCES OF NOT PROVIDING PERSONAL INFORMATION**

You are not obligated to provide your personal information to us. However, in most cases, if you do not provide us with the required personal information, we may not be able to:

- provide our services to you or your associated company or other entity
- issue you with any premium refunds (where applicable)
- assess, investigate and finalise a claim which you may make under a policy

**SHARING AND DISCLOSING PERSONAL INFORMATION WITH OTHERS**

Access to your personal information is restricted to employees and trusted third party providers (“Data Processors”) in accordance with the lawful bases outlined in this policy. A non-exhaustive list of who we may share your personal information with includes:

- professional advisors who assist us with our legal, tax, audit and accounting obligations (e.g. accounting firms and law firms)
- real property professional advisers such as property valuers, licensed conveyancers, land surveyors, building consultants, and solicitors and/or notaries

- third party advisers who assist with investigating, assessing and settling claims
- affiliated companies that provide us with management tools and services
- companies that provide us with internal management and data sharing tools
- companies that provide us with email marketing tools to help us manage our email communications
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets with

The Data Processors we use can only process your personal information in accordance with our instructions, in compliance with data protection laws, and must demonstrate they have implemented appropriate confidentiality and security measures. You may contact our Privacy Office for a current list of the Data Processors we work with.

### WHERE WE COLLECT PERSONAL INFORMATION FROM

We may collect information in the following ways:

- directly from you by way of telephone, email, post, text or fax communication, as well as in person and at industry events
- from people acting on your behalf such as lenders, lawyers, mortgage brokers, valuers, surveyors, accountants, finance brokers, real estate agents and conveyancers (“Representatives”)
- by way of an online form or application submitted by yourself or your Representatives
- publicly and commercially available sources such as land registry offices, online conveyancing services and other similar services

### HOW WE USE ‘COOKIES’

Our websites and web-based applications (“Sites”) use cookies and similar technologies to improve the user experience and to ensure the Sites are functioning effectively and properly. A cookie is a small text file that is placed on a computer or other device and collects information about your usage of the Sites, such as time spent on a website, pages visited, and user preferences such as default language for the site.

We may use a variety of cookies on our Sites:

*Necessary Cookies:* These cookies are essential to enable you to navigate the Sites and to use their features. Without these cookies, services you have asked for cannot be provided. For example, a cookie must be used to allow you to securely log in to a restricted area of these Sites.

*Performance or Analytic Cookies:* These cookies collect information about how you use our Sites. For example, these cookies collect information such as the browsers and operating systems used, the domain name of the website previously visited, the number of visits, average duration of visit, and pages viewed. These cookies are used to gather statistical information that allows us to improve the design, user-friendliness and functionality of our Sites. They provide us with overall patterns of usage on the Sites—we don’t use this information to observe the usage of a single person.

*Preference Cookies:* These cookies allow the website to remember and maintain choices and preferences you make concerning your use of the Sites. For example, these cookies collect information such as your username or ID, language preference or multimedia player settings. These cookies can also be used to remember changes you have made to text size, fonts, and other customizable parts of web pages.

*Social Media Cookies:* These cookies collect information about your social media usage. By placing social media ‘buttons’ on our Sites, you are able to share or bookmark pages from our Sites. These third party social media sites may log information about your activities on the Internet including on our sites. You should review their usage and privacy policies to understand exactly how social media companies use your information and to find out how to opt-out, or delete, such information.

*Advertising Cookies:* these cookies track browsing habits and are used to deliver targeted promotions or advertisements or marketing material based on your interest on our Sites. They remember that you have visited a website and this information may be shared with other organizations such as advertisers.

Cookies can also be of two forms:

*Persistent:* information these cookies collect remain stored for a pre-determined length of time, even after you

close your browser.

*Session:* information these cookies collect expire and are permanently lost when you close your browser. As such, when you restart your browser and revisit the website that created the cookie, the site will not recognize you—a new session cookie will need to be generated.

On our Sites, we use necessary, performance and preference cookies. We use the information collected by these cookies for security purposes, to facilitate your navigation of our Sites, to allow you to fully utilize our Sites features and to continually improve upon your user experience of the Sites. By using our Sites, you agree that we can place cookies on your computer or device as explained in this policy.

Most web browsers automatically accept cookies but provide controls that allow you to block or delete them. If you are not comfortable with our use of cookies, you may reconfigure your browser settings to limit cookie usage and you can always change those settings at any time. However, if you decide to limit or refuse the use of cookies, certain functions and features of our Sites may not work as intended.

In most modern browsers, you can block or delete cookies by clicking Settings > Privacy > Cookies. Other browsers may provide instructions for blocking or deleting cookies within their privacy or help documentation. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## HOW WE PROTECT PERSONAL INFORMATION

We implement appropriate technical and organisational measures to protect and secure your personal information from unauthorised access, unlawful processing, accidental loss or disclosure, misuse, alteration or corruption. A non-exhaustive list of these measures include:

- secure servers
- lockable filing cabinets and restricted access to offices
- password protection/encryption of files
- password protection on all laptops and computers
- encryption of attachments for sensitive personal information sent by email

All our employees receive regular privacy awareness training which includes instruction as to the careful disposal or destruction of personal information. We also have procedures in place to deal with any suspected personal information breaches and will notify you and the appropriate data protection authority where we are legally required to do so.

## HOW LONG WE KEEP PERSONAL INFORMATION

We retain your personal information only for as long as is necessary in order to fulfil the purposes outlined in this policy or as required because of certain laws (e.g. for tax, legal or accounting purposes). Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent. When no longer required, personal information will be destroyed, erased or made anonymous in an appropriate manner. We also have retention and destruction policies in place to meet these obligations.

## INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

When you visit our websites, use our products or services, or contact us to make general inquiries, the personal information you submit is stored and transferred to our affiliated companies in Canada and the United States. We may also utilise certain products or services hosted in countries outside of the European Economic Area ("EEA"). By submitting your personal information, you are agreeing to this transfer, storage and/or processing to allow us to provide you with our products and services.

International transfers, whether to a third party or to a corporate affiliate located outside of the EEA, are for the following purposes: administrative, data back-up, claims administration, reinsurance, website hosting, email server hosting, email communications management, and the management and processing of policies. Such transfers are on the basis of a variety of legal mechanisms and we ensure (i) the necessary level of protections are in place for your personal information, (ii) strict agreements and measures set out by our company to protect your data are being complied with and (iii) relevant data protection laws are being complied with. Regulatory

authorities and enforcement agencies in these other countries may access your personal information in accordance with their laws.

### YOUR RIGHTS AND HOW TO CONTACT US

You have the right to request a copy of the personal information that we hold about you as well as to correct inaccurate or incomplete personal information. Unless there is a valid reason for not doing so (and you will be so notified), we will respond within one month of the receipt of such requests. You also have the right to request (i) erasure, (ii) portability, or (iii) restricted processing of your personal information in accordance with the data protection laws.

A request from you to exercise any of the above rights must be made in writing and to verify your identity, we will require appropriate identification (for example, a certified copy of your passport) before we will act on any request.

Please make your written request to:

By email: [PrivacyEU@stewart.com](mailto:PrivacyEU@stewart.com)

By post: Stewart Title Europe Limited  
Privacy Office  
Junction Business Centre  
1<sup>st</sup> Floor, Sqaq Lourdes,  
St Julian's SWQ 3334  
Malta

If you have any questions or concerns about your privacy and our privacy practices, it is our hope that you will contact us first to address these issues; however, if you feel we have not adequately dealt with your concerns, you may also contact your local data protection authority by visiting [www.idcp.gov.mt](http://www.idcp.gov.mt) for contact details.