

Dubai International Finance Centre (DIFC) Personal Data Privacy Statement

This policy sets out how Allied World Underwriting (DIFC), Ltd (“Allied World”, “we”, “us” or “our”) collects, uses, stores, discloses or otherwise processes personal data about you so that we can provide you with and manage insurance products and services, or employment or potential employment. This policy also provides information about your rights. At Allied World, we are committed to protecting the privacy of your personal data and complying with our obligations under applicable data protection, privacy and cybersecurity laws, including the Data Protection Law, DIFC Law No. 5 of 2020 and the Data Protection Regulations each as amended from time to time (collectively, the “DP Law”).

What Personal Data of Yours We Collect

Personal data is any information from which an individual can be directly or indirectly identified. Depending on the type of product, service or employment involved, the types of personal data we may collect or otherwise process include:

- an individual’s name, age, date or place of birth, mailing address, e-mail address, phone or other contact details, gender, marital status, location and activity data, online identifier, IP address, other personal identifier or government issued identification number (such as Emirates ID, passport, driver’s license or tax identification number);
- financial, investment, tax, credit, anti-fraud, anti-money laundering, counter-terrorism financing, sanctions, credit card, bank details, risk, policy, or previous or current claim data;
- current and past employment, education, immigration status, names and contact information of references, or other personnel records; or
- sensitive personal data, including an individual’s race, ethnicity, origin, political affiliation or opinions, religious or philosophical beliefs, union membership, physical or mental health, genetics, biometrics (including photos, surveillance video, fingerprints and facial recognition), sex life, sexual preferences or orientation, the commission or alleged commission of any crime or offense, involvement in proceedings for any crime or other offense or any criminal sentence, or any other similar sensitive information.

Why We Collect Your Personal Data

Purposes of Processing Personal Data. Allied World collects and processes personal data for the purposes noted below or as may be otherwise notified, and you should only provide the personal data needed for such purposes. Personal data relating to policyholders, policy claimants or beneficiaries, brokers or intermediaries, consultants or service providers, or employees or employment candidates may be collected or processed by Allied World (or by a third party on our behalf) for the purposes of:

- conducting our (re)insurance business, including:
 - processing your application, insurance underwriting, policy and claims administration, policy cancellation or renewal;
 - administration of broker appointments;
 - actuarial research and analysis and risk modelling;
 - marketing services;
- recruiting and employment, including:
 - hiring, immigration status for you and your family, training, performance appraisal, attendance records, compensation and employee benefits or services;
 - providing contact details and photos;
 - equal opportunities monitoring;
 - maintaining emergency contacts and taking action in the event of an emergency;
 - making travel arrangements;
 - responding to a reference request;
 - performing human resources functions;
 - employee monitoring;
 - any disciplinary or grievance related matters;
- general management, including:
 - providing or receiving products or services;
 - responding to your queries or other correspondence;
 - completing due diligence and background checks;
 - access to and monitoring of IT applications and systems;
 - building access or security;
 - transferring books of business, company reorganisations or other potential corporate transactions;
 - audits, investigations, claims or litigations, including investigating fraud, misconduct or any unlawful acts;
 - complying with regulatory or legal requirements; and/or
 - any purposes directly related or comparable to the above.

Lawful Basis to Process Personal Data. The lawful basis for the processing of your personal data is for:

- the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;
- compliance with a legal obligation to which Allied World is subject under applicable law;
- to protect the vital interests of you or of another natural person;
- for the performance of a task carried out in the public interest;

- for our or a third party's legitimate interests (for the purposes listed above), except where overridden by your interests, fundamental rights or freedoms requiring personal data protection; or
- in limited instances, your consent (note that when we or others on our behalf process sensitive personal data, your consent may be necessary to lawfully process such data unless such processing is necessary to protect the vital interests of you or another natural person where you are physically or legally incapable of giving consent; necessary in relation to obligations and rights regarding employment; such personal data has been made public by you; for the establishment, exercise or defence of a legal claim; for compliance with applicable law; for reasons of public interest on the basis of DIFC law; or for health services. Where sensitive personal data or any other personal data is processed based on consent, you may withdraw that consent at any time; however, if you withdraw consent, this may impact our ability to provide products, services, potential employment or employment benefits).

Automated Decision-Making or Direct Marketing. Allied World does not use personal data for any automated decision-making or profiling. We primarily sell products and services to commercial entities via intermediaries, and not directly to individuals. Allied World does not use personal data to send direct marketing information, except it may utilize e-mail, company physical addresses or other means to market its services or distribute information unless such recipient has advised Allied World that they do not wish to receive the information.

From Where We Collect Your Personal Data

So that we can provide products, services, employment or potential employment to you, we may need to collect your personal data from:

- you, your or our agents and representatives, including your family members, current and former employers, service providers, (re)insurance brokers or other intermediaries, employment agencies or other recruiters;
- people who are involved in a claim or who assist us in investigating or handling claims, including the claimant, third parties or beneficiaries claiming under your policy, witnesses, experts, or healthcare practitioners; or
- marketing lists, industry or other databases, monitoring hardware and software, social media or other publicly available sources.

The provision of personal data may be a statutory or contractual related requirement. If you do not provide or allow others to provide your personal data, in certain instances, we may not be able to provide you with our products and services, potential employment, or employment related benefits. If you nominate individuals to be covered by your insurance policy, you should ensure that they are aware of this policy and any other privacy information we provide to you.

To Whom We Disclose or Transfer Your Personal Data

We may disclose or transfer your personal data to other parties where necessary for the lawful bases and purposes listed above. Since Allied World operates globally, the parties that we disclose or transfer your personal data to may be located inside or outside of the DIFC. Outside of the DIFC, such locations will vary from time to time, but may include where other members of the Allied World Assurance Company Holdings, Ltd group of companies operate or where other third parties to whom we may transfer data, or their affiliates or sub-contractors, operate. In the absence of a DIFC adequacy decision, personal data would be disclosed or transferred outside of the DIFC in compliance with the DP Law, which may include appropriate standard contractual clauses or other safeguards. If you would like further details of how your personal data would be protected if transferred outside of the DIFC, please contact us as indicated below.

Third parties to whom we may disclose or transfer your personal data include other insurers; reinsurers; intermediaries; claimants; beneficiaries; market places; professional advisers, third-party service providers or agents; law enforcement and regulatory bodies; healthcare providers; data storage and data handling providers; employment benefit providers; any affiliates or allowed sub-contractors of any of the above; and/or as otherwise required or allowed by applicable law or regulation.

Retention of Your Personal Data

We retain the personal data processed by us for as long as is necessary for the purpose or related/comparable purpose for which it was collected, including as required by applicable law, regulation or contract, or for so long as there is any possibility that either you or we may wish to bring a legal claim. In the absence of legal, regulatory or contractual requirements, or a possible legal claim, our baseline retention period for records and other documentary evidence created in the provision of services is generally, depending on the type of record, at least seven years.

How You Can Exercise Your Rights Over Your Personal Data

You have certain information rights relating to your personal data held by Allied World, including, under certain circumstances and subject to applicable law, a right to ask for access to the personal data we hold about you, to seek rectification or erasure of such data, to restrict or object to our processing of such data, to complain about our handling of your personal data, to data portability to another data controller, and, where we process personal data based on consent, to withdraw consent at any time. Your information rights are subject to certain legal exemptions and limitations and it is not always possible for Allied World to comply with the request. Where we can, we aim to respond to requests, or provide a reason for delay or decline where legally permitted, within one month of receipt. Unless unreasonable or unduly burdensome, requests will be handled free of charge. Allied World will not discriminate against you for exercising any applicable rights. If you wish to exercise any of these rights or have any other inquiries or complaints in relation to your personal data, please contact us in writing at:

E-mail: dataprotection@awac.com

By post: Office 7, Level 9
Tower 1,
Al Fattan Currency House
DIFC
Dubai, UAE
Attn: Allied World Legal & Compliance Department

You also have the right to lodge a complaint regarding our use of your personal data with the DIFC Commissioner of Data Protection at:

The Commissioner of Data Protection
Dubai International Financial Centre Authority
Level 14, The Gate
P.O. Box 74777
Dubai, UAE
commissioner@dp.difc.ae
Tel: +971 4 362 2222

Changes to this Privacy Statement

Please note that we may update this policy from time to time and amend it to reflect changes in legislation or other business changes. You can review the latest version of this policy on our website.