

## **E.U. & U.K. Personal Data Privacy Policy Statement**

This policy statement sets out how Allied World Assurance Company (Europe) dac, Allied World Managing Agency Limited, AWAC Services Company (Ireland) Limited, Allied World Capital (Europe) Limited and Gravity Underwriting Limited (collectively, “Allied World”, “we”, “us” or “our”) collect, use, store, disclose or otherwise process 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 General Data Protection Regulation (“GDPR”) of the European Union (“EU”) and the United Kingdom.

### **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 data, online identifier, IP address, or government issued identification number (such as national insurance, passport, driver’s license or tax identification number);
- financial, investment, tax, credit, anti-fraud, 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 and fingerprints), 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, 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;
  - 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;
- 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;
- 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; for the establishment, exercise or defence of a legal claim; for reasons of public interest on the basis of EU, Irish or U.K. 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); or

- as otherwise allowed by the GDPR in relation to crime related data.

***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 he or she does 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, 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 European Economic Area (“EEA”). Outside of the EEA, 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 an EU adequacy decision, personal data would be disclosed or transferred outside of the EEA in compliance with the GDPR, 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 EEA, 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 such as Lloyd’s; 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, 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 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. 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:**           To the relevant Allied World entity at either:

3 Georges Quay Plaza  
Georges Quay  
Dublin 2, Ireland  
Attn: Data Privacy Officer

OR

20 Fenchurch Street, 19<sup>th</sup> Floor  
London EC3M 3BY  
England  
Attn: Data Privacy Officer

You also have the right to lodge a complaint regarding our use of your personal data with the supervisory authority in the country in which you live or work or where your complaint arose. For further information on how to contact the UK or Irish authorities, please refer to the UK Information Commissioner's Office website at <http://www.ico.org.uk/concerns> or the Irish Data Protection Commissioner's website at <https://www.dataprotection.ie/docs/Making-a-Complaint-to-the-Data-Protection-Commissioner/r/18.htm>.



## **Changes to this Policy**

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.